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**From:**  
**Sent:** Wednesday, 3 March 2021 8:44 am  
**To:**  
**Subject:** FW: late Change 1 submission - Smith & Ors, SW Rolleston  
**Attachments:** 2107.Smith&Ors C1 RPS submission with appx.pdf

**Categories:**

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**From:** Fiona Aston <[fiona@astonconsultants.co.nz](mailto:fiona@astonconsultants.co.nz)>  
**Sent:** Tuesday, 2 March 2021 2:44 PM  
**To:** Andrew Parrish <[Andrew.Parrish@ecan.govt.nz](mailto:Andrew.Parrish@ecan.govt.nz)>; Tammy Phillips <[Tammy.Phillips@ecan.govt.nz](mailto:Tammy.Phillips@ecan.govt.nz)>  
**Subject:** late Change 1 submission - Smith & Ors, SW Rolleston

Hi Andrew and Tammy

Further to my discussion with Tammy this pm, please find attached a late submission on Change 1 lodged on behalf of Smith & ors, SW Rolleston. Please can it be accepted as a late submission, We apologise for any inconvenience caused by this. As noted under 'Preliminary' in the submission we consider acceptance is appropriate for the following principal reasons:

*We do not consider that any parties will be adversely affected, as we understand there is no further opportunity for public input on Proposed Change 1. We understand there is a tight timeline for reporting to the Minister on submissions, but note that the submission is very brief, and does not raise any different matters to those raised in other submissions lodged by Aston on behalf of clients. With respect to the relief sought – inclusion of our land as an FDA area – we are immediately adjoining (to the south) of land sought to be included as an FDA area under the Carter Group submission (submission 45), so the merits of including this general west Rolleston area as an FDA will already have been considered in response to the Carter submission.*

A location plan in relation to the Carter West Rolleston land is shown on page 15 of the attached submission (which is p11 of the Proposed Selwyn DP submission attached as AppA to the Change 1 submission).

Thank you for your help with this matter.

Kind regards

**Fiona Aston**  
Principal

**Aston Consultants**

Resource Management & Planning

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CONSULTANTS

*resource management & planning*



# Submission on Proposed Change 1 to Canterbury Regional Policy Statement

2 March 2021

Environment Canterbury

## RESOURCE MANAGEMENT ACT 1991

### ENVIRONMENT CANTERBURY

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

##### **Submitter Details**

Name: Alison Smith, David Boyd, John Blanchard

Address: C/- Alison Smith, 4 Hevers Lane, Redmund Spur, Christchurch  
8025

Contact name: Fiona Aston

Contact organization: Aston Consultants Ltd Resource Management and Planning

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Christchurch 8140

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Phone Number: 03 3322618

Mobile Number: 0275 332213

##### **Preliminary:**

We note that this is a late submission, lodged after the closing date for submissions (15/2/21). We request that the submission be accepted as a late submission. We do not consider that any parties will be adversely affected, as we understand there is no further opportunity for public input on Proposed Change 1. We understand there is a tight timeline for reporting to the Minister on submissions, but note that the submission is very brief, and does not raise any different matters to those raised in other submissions lodged by Aston on behalf of clients. With respect to the relief sought – inclusion of our land as an FDA area – we are immediately adjoining (to the south) of land sought to be included as an FDA area under the Carter Group submission (submission 45), so the merits of including this general west Rolleston area as an FDA will already have been considered in response to the Carter submission.

We apologise for any inconvenience caused by lodging this submission late.

##### **Trade Competition:**

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

Aston Consultants Resource Management & Planning

**Provisions to Which this Submission Relates:**

Change 1 in its entirety.

**Position on these Provisions:**

We oppose Change 1 to the extent that amendments are necessary to give effect to intent of, and the relief sought by, this submission.

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

The Submitters jointly own 48.64 ha of land at south west Rolleston (Dunns Crossing Road/Selwyn Road corner). They have lodged a submission on the Proposed Selwyn District Plan seeking General Residential rezoning (attached as **Appendix A**).

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.

**Decision/Relief Sought**

1. Amendments to Change 1 to provide a more flexible and responsive urban growth management approach, including enabling full consideration of plan changes, including the Submitter's rezoning submission, which are outside the Map A FDAs, priority greenfield and existing urban areas, but are consistent with the NPS-UD. If Change 1 is retained in its current form, this could be by way inclusion of our land as and FDA area on Map A.
2. 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: March 2, 2021

**Appendices:**

Appendix A: Alison Smith, David Boyd, John Blanchard Submission on Selwyn Proposed District Plan



# Submission on Proposed Selwyn District Plan

Alison Smith, David Boyd, John Blanchard

10 December 2020

Selwyn District Council

## **RESOURCE MANAGEMENT ACT 1991**

### **SELWYN DISTRICT COUNCIL**

#### **SUBMISSION ON THE PROPOSED SELWYN DISTRICT PLAN**

##### **Submitter Details**

Name: Alison Smith, David Boyd, John Blanchard  
Postal address: C/- Aston Consultants Ltd  
Resource Management and Planning  
PO Box 1435  
Christchurch 8140  
Email address: fiona@astonconsultants.co.nz  
Phone Number: 03 3322618  
Mobile Number: 0275 332213  
Contact Person: Fiona Aston

##### **Trade Competition:**

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

##### **Hearing Options:**

We do wish to be heard in support of our submission. If others are making a similar submission, we may consider presenting a joint case with them at the hearing.

##### **Specific Provisions to Which this Submission Relates:**

All of the Proposed Selwyn District Plan, including but not limited to:

District Planning Maps, in particular but not limited to the Site as identified below.

Interpretation

Strategic Directions

General District Wide Matters – UG Urban Growth

Area Specific Matters – Residential Zones



## Decision we wish the Council to make:

### Preferred Relief:

1. Amend Proposed Selwyn District Plan (PDP) Planning Maps by rezoning the following land and any other neighbouring land as appropriate from General Rural Specific Control Area 1 (SCA1) Inner Plains to General Residential:

Registered Owner	Address	Appellation Title	Area (ha)
Alison Smith & Derek Tyson	Selwyn Road	RS 25807 & RS 23644	28.43ha
David Boyd	966 Selwyn Road	Lot 1 DP 74801	10.21 ha
John Blanchard	984 Selwyn Road	Pt Lot 2 DP 491231 &Pt Lot 2 DP 74801 (part)	10.00 ha
<b>TOTAL</b>			<b>48.64 ha</b>

### Alternative Relief:

2. Rezone the land identified in 1. above to Large Lot Residential SCA 1 minimum average lot size 2000m<sup>2</sup>, minimum lot size 1000m<sup>2</sup>.

### And

3. Rezone any such other neighbouring land to General Residential and/or Large Lot Residential as may be appropriate including on sound resource management grounds and as is in the interest of the Submitter.
4. Changes, additions, amendments to the Proposed Selwyn District Plan (PSDP) Urban Growth and Development provisions to ensure consistency with the NPS-UD 2020 including but not limited to Obj 6c) and Policy 8 (additions in bold and underlined, and deletions as strike out).

a) SD-UFD-O2

*There is ~~sufficient~~ plentiful feasible development capacity to meet anticipated demands for housing and business activities.*

b) UG-Overview

*The Selwyn District is a desirable place to live, work, and play, which is generating a demand for housing and business opportunities to support the needs of the growing community now and into the future. The Urban Growth chapter assists in meeting these demands by encouraging a consolidated and compact settlement pattern that optimises the use and development of resources. This chapter also assists in ensuring there is ~~enough~~ **plentiful feasible** urban development capacity available to meet the*

District's housing and business needs while assuring that high quality living and business environments continue to be developed to implement the adopted Development Plans.

Ongoing urban development capacity is provided through the identification of new urban areas that are subject to the Urban Growth Overlay and by enabling existing sites to be intensified or redeveloped **and by a responsive approach towards other rezoning proposals which are in accordance with the National Policy Statement – Urban Development 2020.** The need for zoning processes to demonstrate consistency with all of the urban growth policies and to consider relevant Development Plans will ensure that new urban growth areas do not conflict with legitimately established land use activities, compromise the quality of the environments that people value, and result in adverse environmental effects.

The Urban Growth Overlay maps the spatial locations identified in Development Plans that have been adopted by SDC. These assist in determining where new urban areas can locate around townships and delivering the outcomes that are anticipated to be achieved within these environments. ~~Any urban development or subdivision of land outside of the existing township boundaries is precluded unless the urban growth policies have been fulfilled through the zoning process under Schedule 1 of the RMA.~~

c) UG-P3

~~Avoid the zoning of land to establish any new urban areas or extensions to any township boundary in the Greater Christchurch area of the District outside the Urban Growth Overlay~~

d) UG-P4

Manage the zoning of land to establish any new urban areas or extensions to any township boundary ~~outside the Greater Christchurch area of the District outside the Urban Growth Overlay,~~ where it maintains a consolidated and compact urban form.

e) UG-P7

Any new urban areas shall deliver the following urban form and scale outcomes:

Township boundaries maintain a consolidated and compact urban form;

1. The form and scale of new urban areas support the settlements role and function within the District's Township Network;
2. The natural features, physical forms, opportunities, and constraints that characterise the context of individual locations are identified and addressed to achieve appropriate land use and subdivision outcomes, including where these considerations are identified in any relevant Development Plans; and
3. ~~The extension of township boundaries along any strategic transport network is discouraged where there are more appropriate alternative locations available.~~

f) UG-P10

Ensure the establishment of high-quality urban environments by requiring that new urban areas:

1. Maintain the amenity values and character anticipated within each township and the outcomes identified in any relevant Development Plan;
2. Recognise and protect identified Heritage Sites, Heritage Settings, and Notable Trees; and
3. ~~Preserving~~ **Have particular regard to** the rural outlook that characterises the General Rural Zone, **including** through appropriate landscape mitigation, densities, or development controls at the interface between rural and urban environments.

g) UG-P11

*When zoning land to establish any new urban area or to extend any township boundary, ~~avoid~~ **or mitigate** sensitivity effects on:*

1. *any adjoining rural, industrial, inland port, or knowledge zone; and*
2. *on the safe, efficient and cost-effective operation of important infrastructure, land transport infrastructure, and the strategic transport network*

h) UG-P13 Residential growth – Greater Christchurch area

*Any new residential growth area within the Greater Christchurch area shall only occur where:*

1. *Extensions assist in meeting the housing bottom lines (minimum housing targets) of 8,600 households over the medium-term period through to 2028;*
2. *A HDCA and FDS identify a need for additional feasible development capacity for the township and the additional residential land supports the rebuild and recovery of Greater Christchurch;*
3. *The land is subject to an Urban Growth Overlay and the area is either:*
  - a. *a ‘greenfield priority area’, or any subsequent urban growth areas or urban containment boundaries, in the CRPS where it is a residential activity; or*
  - b. *identified in an adopted Rural Residential Strategy and in accordance with CRPS Policy 6.3.9 where it is a rural residential activity.*
4. *The minimum net densities of 12hh/ha for residential activities or 1 to 5hh/ha for rural residential activities are met,; **or***
5. **The new residential growth meets 1-4 above and/or is in accordance with and will give effect to the National Policy Statement – Urban Development 2020, including by supplying significant development capacity, supporting competitive land and development markets and contributing to well-functioning urban environments.**
6. *A diversity in housing types, sizes and densities is **provided**; and*

7. *An ODP is prepared that addresses the matters listed in UG-ODP Criteria and incorporated into this Plan before any subdivision proceeds.*
5. Amend LLRZ-Policies as follows  
*LLRZ-P1*  
*Provide for a ~~very~~ low density and spacious residential character by:*
  - 1. managing the density of development; and*
  - 2. managing the height, bulk and form of development.*
6. Delete the EIB Canterbury Plains Area overlay from the Site and any Site in the District that has not had a specific site investigation to determine that there are in fact ecosystems and indigenous biodiversity present.
7. Any consequential, further or alternative amendments to the Proposed Selwyn District Plan to be consistent with and give effect to the intent of this submission and the interests of the Submitter.

## **Reasons for the Submission**

1. The reasons for our submission are outlined below. In summary:
  - a) The proposed rezoning is both appropriate and necessary to achieve sustainable growth and development of Rolleston and meet the requirements of the NPS-UD 2020.
  - b) The Site is an ideal, logical and preferred location for further urban growth of Rolleston. It will achieve a compact, and efficient, urban form with excellent connectivity by multiple transport modes, consistent with the proposals for rezoning land immediately adjoining to the north, and to the east on the opposite side of Dunn Crossing Road.
  - c) The merits of re-zoning the Site should be assessed with an eye on the bigger picture of the land that is being developed now, and the nearby land that is subject to Plan Change requests or, it is understood, will be subject to submissions on the PSDP to re-zone. The Site forms part of a bigger and logical extension to the growth of West and SW Rolleston; the decision on this Site should go hand in glove with nearby re-zone decisions so the Site is not potentially left as an isolated block of GRUZ land surrounded on most sides by GRZ land.
  - d) Adjoining the Site are

- Plan Change 64: Faringdon SW and Faringdon SE over 84 ha yielding about 1000 lots
  - Plan Change 70: covers 65 ha and yields about 800 lots
  - Plan Change 73: the Skellerup block covers 160 ha and yields 2110 lots.
- e) The rezoning of the Site will provide a further approximately 583 lots which represents the equivalent of approximately 9.3% 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.
- f) Any adverse effects on the environment arising from the rezoning will be minimal, if any, and able to be mitigated. A high amenity master planned development is proposed.
- g) Significant positive effects arise from the rezoning. It will enable the short term housing demand at Rolleston to be met, and will deliver affordable housing which is currently undersupplied.
- h) 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, or where upgrades are required, these will be developer funded.
- i) The rezoning is consistent with the Proposed Selwyn District Plan objectives and policies, except those relating to Strategic Directions Urban Form and Development and Urban Growth which are already out of step with higher order RMA statutory documents because they do not give effect to the NPS-UD 2020 (and are sought to be amended through this submission).
- j) The alternatives of retaining General Rural or Large Lot Residential are not an efficient use of this block of land located as it is immediately adjoining the intended urban area of Rolleston, and in a location accessible to the town centre by active transport modes as well as car. If zoned Large Lot Residential a higher density LLR is more appropriate, more efficient and more consistent with market demand – i.e. a minimum average lot size of 2000m<sup>2</sup>.
- k) The rezoning is consistent with and the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.
- l) There is no evidence that on the Site there are *areas of significant indigenous vegetation and significant habitats of indigenous fauna* (section 6 RMA), and certainly it seems unreasonable for the Overlay to be placed over urban areas such as

Rolleston which has and will undergo significant re-working of the land as part of urban development arising from re-zoning. The focus of section 6 is on the significance of the vegetation or significance of the habitat, not just that some vegetation or habitat is present (and that is not the case with this Site). The Overlay appears to be a “just in case” provision not a provision with an evidential basis which should be the start point for planning interventions.

## **Background**

2. The submitters, Tyson and Smith, who own the two blocks on Dunns Crossing/ Selwyn Roads corner (36 ha) submitted on the Selwyn Rural Residential Strategy 2014 seeking rural residential (av 5000m<sup>2</sup>) lots for their land, consistent with the LLRZ zoning of land adjoining to the north (known as the Skellerup block).
3. The Commissioners agreed that the land was likely to be suitable for rural residential use at some stage in the future given its location adjoining land identified for RR or future urban purposes. However, at that stage, the prospect of reticulated services extending to this part of Dunns Crossing Road was considered to be ‘some way off’ and likewise Dunns Crossing Rd was unsealed.
4. Rolleston has continued to growth at pace, much faster than was anticipated, and the circumstances are now entirely different, with the very real prospect of surrounding land to be developed in the near future for full urban purposes. In the light of the recent neighbouring plan change proposals, the submitters now favour full urban rather than rural residential zoning as the more appropriate and efficient use of the land.
5. Commissioners’ Recommendation on the Selwyn Rural Residential Strategy 2014

## **SOUTH-WEST ROLLESTON**

### **Submission 22 D&D Tyson and A Smith – Selwyn Rd and Dunns Crossing Rd,**

89. The Submission was supported on 9 April by Alison Smith and Sheila Anstiss. This 36 ha property is at the north-west corner of Selwyn Rd and Dunns Crossing Rd. It is directly to the south of a Living 3 property in Dunns Crossing Rd which was zoned for rural residential purposes as a result of Plan Change 9 to the District Plan, but deferred pending the installation of underground services in the road to service residentially-zoned land opposite. To the east over Dunns Crossing Rd is Rural zoned land which is included in the Rolleston Structure Plan for eventual urbanisation.

#### **Comment**

90. We acknowledge the proximity of the site to land that is likely to eventually be developed for full or rural residential purposes. However the key word here is eventually. At this stage there is no short or even medium term prospect of reticulated water or sewer services being available at this site, and we note that the adjoining Skellerup land, which is zoned Living 3 for rural residential purposes has recently been developed for dairy farming so is unlikely to be redeveloped in the short term.. As well, this end of Dunns Crossing Rd is unsealed. Access to publicly owned reticulation and a sealed road are both matters are included in the suitability criteria and Policy 6.3.9 of the RPS. We consider that these sites may be suitable for rural residential development at some stage in the future. However there is no prospect that these sites, if included in the RSS could be developed for a number of years until these matters are attended to, probably by the development of the other sites described above.

#### **Recommendation**

91. We think this sites should not be included in the RSS for now.
6. The above establishes that the Site has been considered appropriate for residential purposes, but the issue in 2014 was more about ‘when’ not ‘if’. In the light of the recent plan change to intensify the neighbouring LLR zoning referred to in Commissioners’ recommendation, General Residential is now the preferred zoning for the Site.

## **The Site**

7. The Site is a 56.21 ha block of land (‘the Site’) with frontage to Dunns Crossing and Selwyn Roads, both classified as arterial roads in the PDP. **(Figure 1).**
8. The Site has Large Lot Residential (LLRZ) land immediately adjoining to the northwest (the Skellerup Block (and comprising one of the two Plan Change 73 blocks) which is presently used as an irrigated farming block. Directly opposite the Site between Dunns Crossing and Goulds Road is the site of the Faringdon Far West Plan Change 70, a large General Residential (GRZ) proposal and the Faringdon SW and Faringdon SE Plan Changes **(Figure 2).** To the southwest along Selwyn Road are lifestyle blocks zoned General Rural Zone (GRUZ). The land to the southeast over Selwyn Road is farmland zoned GRUZ.
9. The Site is presently used for grazing and dryland farming purposes. There is an existing dwelling at 966 Selwyn Road.



Figure 1: The site (outlined in red)



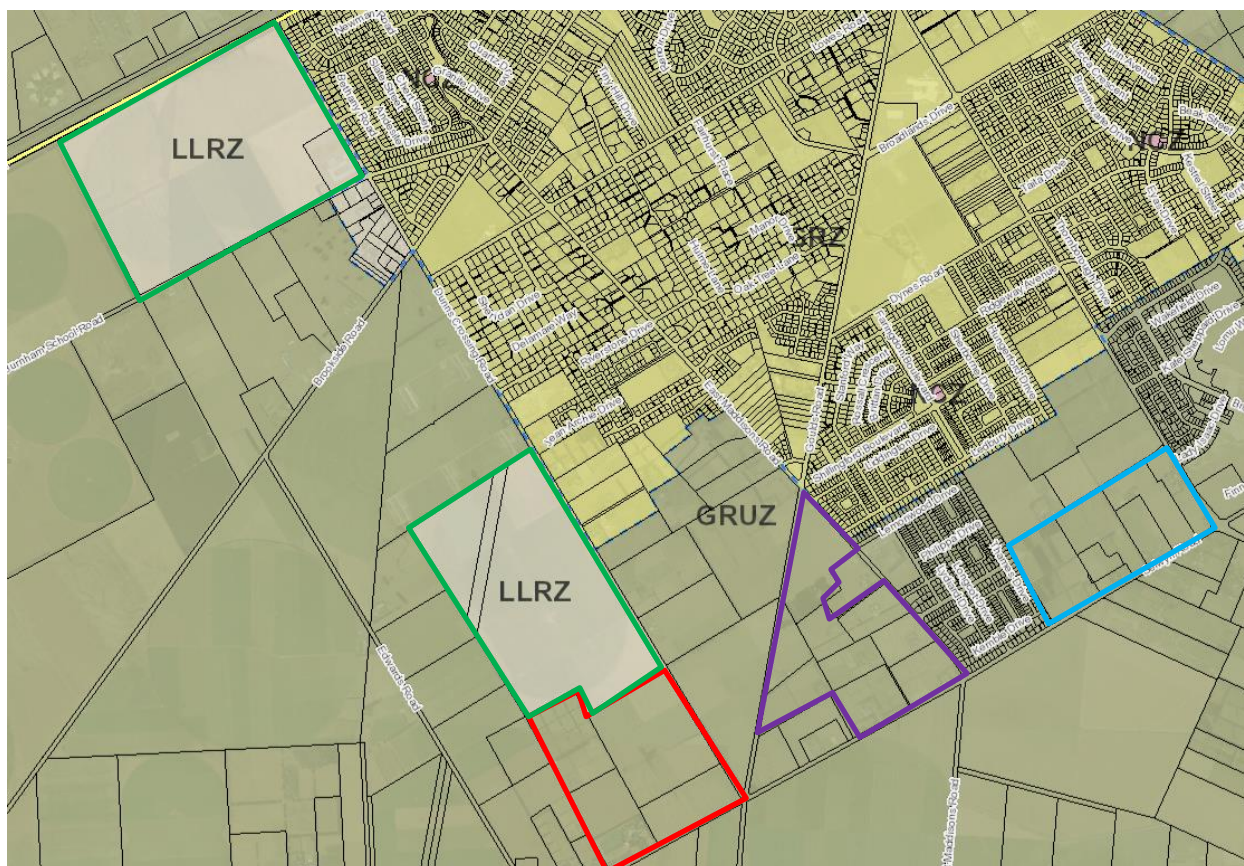


Figure 2: Nearby proposed Plan Changes PC 64 outlined in blue, PC 70 outlined in purple, PC 73 outlined in green. Site outlined in red

10. The Site sits at the southern edge of Rolleston. Rolleston presently had a population of 17,499 (2018 Census) housed in 5304 dwellings. It is rapidly growing:

2006 (count)	2013 (count)	2018 (count)
4959	9555	17499

Statistics NZ: Rolleston Central/NE/NW/SE/SW

## PLANNING STATUS OF THE SITE

### Chapter 6 of the Canterbury Regional Policy Statement ('C6'):

11. The Site is not located within a Greenfield Priority Area – Residential as indicated on Map A Greenfield Priority Areas in Chapter 6 of the Canterbury Regional Policy Statement (Figure 3).

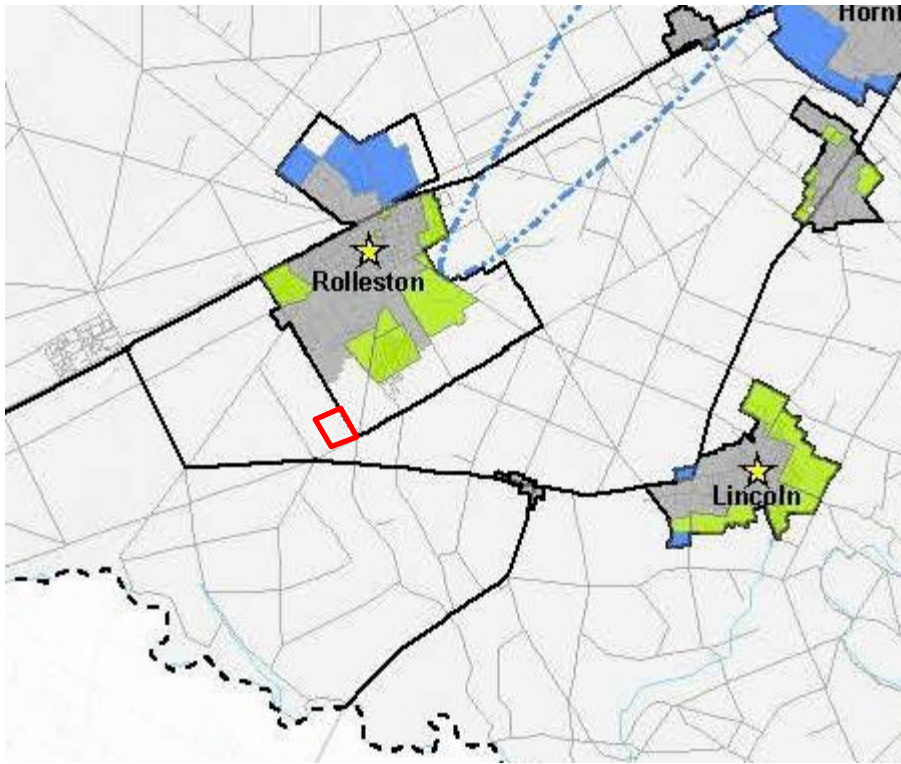


Figure 3: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas  
Site outlined in red (appx).

12. The Greenfield Priority Areas are intended to accommodate the increased demand for households resulting from the Canterbury earthquakes (along with the 'twin policy' of intensification of existing urban areas).

#### **Operative Selwyn District Plan**

13. The Site is zoned Inner Plains in the Operative Plan. The minimum lot size for subdivision and a dwelling is 4 ha.

#### **Proposed Selwyn District Plan**

14. The Site is zoned General Rural Zone East Plains Special Control Area (SCA-RD2) which has a minimum lot size of 4 ha.

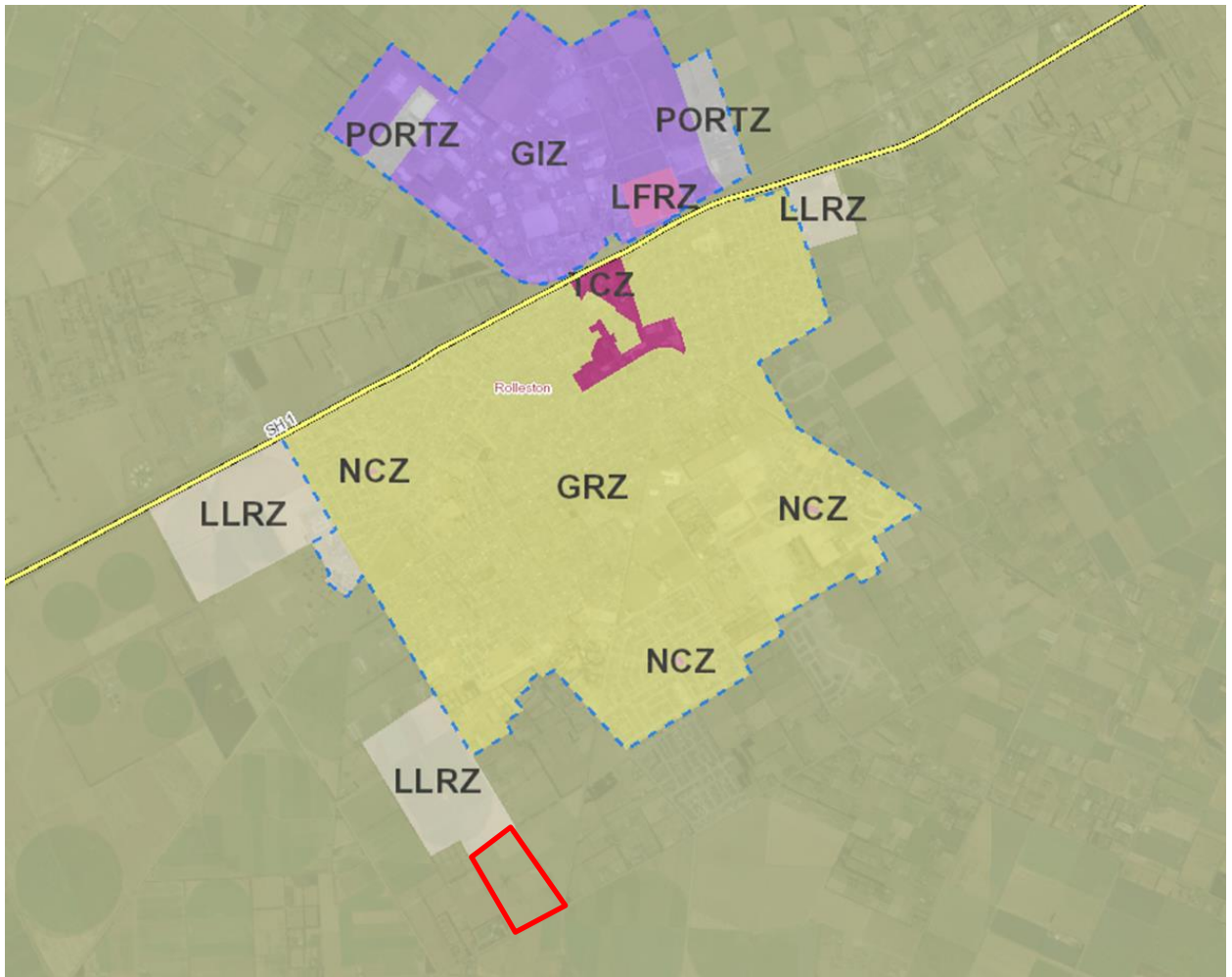


Figure 4: Proposed District Plan Zoning (Site outlined in red)

15. The Site is subject to two planning measures
  - a) The Plains Flood Management Overlay (**Figure 5**).
  - b) EIB Management Overlay: EIB Canterbury Plains Area



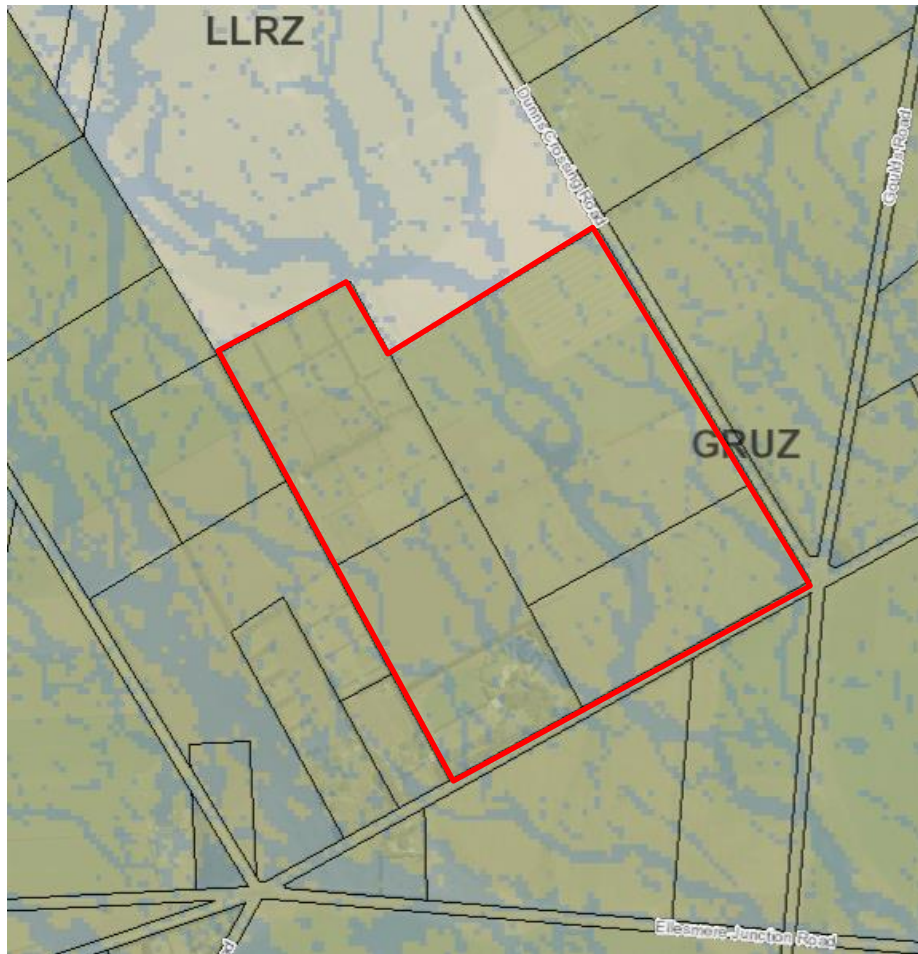


Figure 5: Plains Flood Management Overlay (Site outlined in red)

#### **SUBMISSION: DEVELOPMENT PROPOSAL AND PROPOSED ZONING**

16. The proposal is to rezone a 56.21 ha block held in two ownerships as detailed above from General Rural Zone (GRUZ) to General Residential Zone (GRZ).
17. Subdivision of the Site will create approximately 583 GRZ lots at standard GRZ lots sizes to achieve the PSDP target of 12 households/ha.
18. The development will be designed to work in with whatever plan changes applications are successful, and to the extent necessary to ensure a coherent urban form, that is integrated in to consented urban areas; to provide connectivity to the town centre, making appropriate linkages for roads, and easy and safe access to the community including by walking and cycling.
19. The future residential development will provide for sound urban design by:
  - a) A hierarchy of movement corridors.
  - b) Enabling walking and cycling.

- c) Block perimeters being kept as small as practicable to aid permeability and higher public amenity.
  - d) Providing for lifestyle choice and well-being through a range of lot sizes enabling a range of housing typologies with an area of medium density housing on the two central roads.
  - e) Achieving a minimum of 12 hh/ha.
20. The Plan Change 73 ODP has made provision for a connections in to the Site (**Figure 6**).



Figure 6: Plan Change 73 ODP

## EFFECTS ON THE ENVIRONMENT

### Township growth and urban form

- 21. The PSDP defines a Township Network. The purpose of the network is to provide the *framework for managing the scale, function and character of each township within the whole district. Each township has therefore been categorised to reflect its anticipated role in relation to surrounding townships and the district as a whole.*
- 22. Rolleston is categorized as the District Centre; it is set up to function “*as the primary population, commercial and industrial base of the district.*”
- 23. In that role there can be no cap on the size of Rolleston other than any created by planning policies or infrastructure limits. Rolleston sits on land ideally suited to urban development being flat, with a natural fall to the southeast and few site limitations.
- 24. So in terms of township growth, provided servicing, is available then all township growth options will not undermine the planned role for Rolleston.

25. The Site is surrounded by proposed residential development: Proposed Plan Changes 64, 70 and 73 take in land to the east and north of the Site to connect up with the existing built-up area of SW Rolleston. It takes in a large swathe of presently GRUZ or LLRZ land accounting for about 300 ha of land that has the potential to provide about 3600 lots **(Figure 2)**.
26. The prospect of these Plan Change being approved is significant when viewed from an urban form and urban design perspective; if approved in 2021 (and given that hearings on submissions to re-zone land in the PSDP review process are planned for 2022) then the existing and planned urban environment will be fundamentally different to that which exists at December 2012<sup>1</sup>, such is the scale and pace of change in Rolleston.
27. From that perspective the re-zoning of this Site becomes an exercise in in-fill, but whether or not granted, the Site will immediately adjoin the South Rolleston Future Development Area. . It will be a proposal to simply continue the planned outward expansion of Rolleston.
28. In terms of township growth there is significant pressure on extending the Township Boundary as population growth rates far exceed what was anticipated and planned for in strategic planning documents, and subsequently provided in the PSDP. There are no practical constraints on township growth.
29. The logic of urban form is contingent on the outcome of the Plan Changes, but of itself a 56 ha outward extension is of no consequence on the Site as it squares up land presently being developed for residential use. It would continue a pattern of compact, integrated development of new residential areas.
30. An issue of coherent urban form will arise if the Plan Changes are adopted and the Site is left zoned General Rural.
31. Figure 16 of the Our Space Report shows a Future Development Area immediately adjoining to the east on the opposite side of Dunns Crossing Road. However the merits of this proposal (and the Plan Changes) is more about timing than growth and form, and whether planning policies that have been overtaken by growth should now constrain the need to provide for that growth.

### **Neighbourhood and wider community effects**

32. The Site lies immediately adjoining GRUZ land to the east, and west of the Site. It has residential zoning proposed through plan changes for that eastern land. The land to the north is zoned LLRZ and subject to a Plan change for GRZ.

33. A key positive neighbourhood and community effect will arise from the timely provision of more choice in the land/housing market in Rolleston which presently is dominated by a limited number of big developers.
34. The Site will support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. To achieve the proposed minimum density of 12 households per ha some medium density housing will be required, as provided for under the General Residential rules (small site development and/or comprehensive development).
35. Rolleston is well-positioned to accommodate and service the needs of a fast-growing resident population that will in turn support more business activity, schools, community facilities and community organisations.
36. No other reverse sensitivity issues will be in play as the extent of residential activity edge to rural land is minimised. Adjoining rural land to the west is the same ownership as one of the owners of the Site. The Site is a building block squaring off residential development land against Selwyn Road and aligning to the extent possible with the title boundaries of the Skellerup Block and Plan Change 73. It will provide a continuity and consistency in urbanscape and the look and feel of SW Rolleston.

#### **Effects on tangata whenua values**

22. The Proposed District Plan does not identify any resources or sites of significance to tangata whenua on or in close proximity to the Site.
23. The Site is not listed as an archaeological site on the NZ Archaeological Site database.

#### **Landscape and visual effects**

37. The Site is well placed to provide the basis for an integrated, cohesive and coherent development either on its own or in combination with the Plan Change sites nearby. The proposal will lead to a change in the landscape of the Site from a predominantly dryland farming landscape with one existing dwelling to an urban environment dominated by residential building that will, in time, get the benefit of street tree and reserve plantings and landscape treatments around the houses.
38. The visual effects which will arise from a change in the number of vegetative and built elements in the landscape are significant, but not avoidable, if the Site is to contribute to the on-going growth of Rolleston. It will be just a different amenity and quality of environment, still of a high quality, and one that will be entirely consistent with and

supportive of the urban and rural residential/large lot residential development that has proceeded around the Site already.

### **Well-functioning urban environments**

39. The Site, if the Plan Changes are approved, will adjoin the existing built up urban area of Rolleston. Presently it adjoins a LLRZ which signals a change in use to the north of the Site.
40. The conversion of the Site from present rural uses to residential will continue a pattern of planned and staged outward expansion of Rolleston. Such a change has a compelling logic to it despite the Site not being within the Projected Infrastructure Boundary delineation of the outer limit of Rolleston, and not within the staged and strategic intentions provided by the identified Greenfield Priority Areas in Map A (**Figure 3**).
41. Rolleston is growing apace. It is attracting significant interest from new home buyers as people respond to the significant investment in upgraded transport links (Southern Motorway and public transport) and a growing economic base for employment in nearby industrial and commercial areas of the City and at Rolleston.
42. Rolleston has excellent connectivity to the City, both via the Southern Motorway Extension, and a cycleway link into the City. There is a very regular bus service every half hour. The standard trip takes 37 minutes, and the twice daily express service, 30 minutes.
43. It is important in planning terms to view Rolleston as part of Greater Christchurch. It is part of, and contributes to, a bigger economic and social network part of which has been in place a very long time.
44. Rolleston is close to (and made closer in travel times by the Southern Motorway) the substantial and fast growing south west Christchurch industrial area and is far closer to that than much of Christchurch as a location for jobs. It is also close to, and readily accessible to, major employers at Lincoln including the university and research institutes.
45. The Site will help provide a squaring off of the southwest edge of Rolleston, and provide continuity in the urban form of Rolleston. The Site has geographical propinquity with the town centre, and to many of the town's community facilities and amenities. Rolleston is, even at its burgeoning size, still a small town. There are not huge distances to travel to any point. This will enable easy walking and cycling access.
46. An assessment of the criteria in the NPS-UD 2020 for determining a well-functioning urban environment shows that the proposal will deliver urban, housing and residential outcomes that meet those criteria.



47. a) There will be a variety of homes that cater for standard, and medium density lots.
- b) The Site is well-positioned, building as it does on an existing township well-served by public transport and cycling options, to provide good accessibility to jobs, community services, and open spaces. The primary roads within the future Site development area will be able to accommodate a public bus service. The PC 73 blocks to the north each propose small commercial centres to provide for everyday shopping, reducing the need to travel by car for local trips.
- c) The rezoning will support the competitive operation of the land and development markets by rezoning land which is not under the control of the 'major developers' at Rolleston, who are the applicants for all the neighbouring plan change, involving very substantial areas of land. This is essential to reduce the ability of large land developers to control the release of section and houses, thus maintaining elevated market prices.
- d) The Site location mitigates climate change impacts and future natural hazards by being not near the coast and well removed from major rivers.

### **Effects on ecosystems and habitats**

48. The Site is held by two different landowners, has and is being currently used for a mix of low intensity (grazing) farming, and lifestyle purposes. Shelter belts have been established. The Site is a typical plains environment modified by farming management practices over many years.
49. The Site is within the EIB Overlay despite the Site clearly not supporting any significant ecosystems or habitats.
50. No indigenous vegetation values or sites have been identified in the Proposed Selwyn District Plan.

### **Effects on natural and physical resources**

51. None of the Site contains Land Use Classification 1-3 soils. The Site contains Lismore stony and shallow silt loam soils. These soils have limited ability to retain moisture and are considered to have severe limitation for food production even with irrigation.
52. There will be a degree of site disturbance as part of creating the roading network, and reserves, and as part of curtilage development on each lot.
53. The proposed use for residential activity inevitably leads to loss of some rural productive potential as built forms and hard surfaces become dominant.

### **Discharges of contaminants into the environment**

54. There will be no discharges of contaminants into the environment. Wastewater will discharge to the Council's reticulated system and stormwater discharges will be to ground as is the standard approach in Rolleston.

### **Risks from natural hazards or hazardous installations**

55. Parts of the Site are within the Plains Flood Management Area (shown blue **Figure 5**). The Site is outlined in red. This comprises land that is subject to flooding in a 1:200 year event.
56. Proposed Selwyn District Plan Rule NHR2 requires a minimum building finished floor level 300mm above a 200 year Average Recurrence Interval (ARI) flood hazard event. All future dwellings within the proposed GR and LLR zones will meet this requirement.
57. There will be no hazardous installations.

### **Geotechnical assessment:**

58. Either a separate geotechnical investigation will be required at subdivision (or before), or the investigations undertaken for adjoining plan change sites could be adopted for this Site. The Site is within a low risk geotech area (brown hatched), as shown on the plan McCahon map below (on SDC website). The Site is outlined in red (appx).



### **Contaminated land:**

59. A Preliminary Site Investigation can be carried out at subdivision stage but the Site's long use for dryland farming purposes would suggest the risk of land contamination from a HAIL activity is low, or any potential areas of contamination will be associated with farm sheds and vehicle servicing areas.

### **Economic effects**

60. The site will yield approximately 588+ new residential lots. As such it is a medium-large scale development and will significantly contribute to the economic well-being of Rolleston and the trades and services that support residential development and subdivision according to that scale.
61. The development will generate local benefits to Rolleston, albeit some of these benefits will merely be a transfer from other locations in the Region or Selwyn itself. At a regional level much of the economic value generated by the development may not be net additional or new. This is because if the Site was not zoned for development then that demand for housing would presumably be satisfied in another location within the region.
62. The economic activity associated with the development of the Site includes economic activity supported during land development, construction of services and houses, and expenditure by residents once development is completed. There are also flow-on effects from residential development with builders, developers and new residents purchasing goods and services from other local business.
63. Rezoning the Site Residential will create increased competition and choice in residential housing markets, in a manner that is strongly and directly consistent with the NPS-UD. Plan Changes 64 and 70 for southwest Rolleston are very big developments by two developers over about 150 ha yielding about 1800 lots. PC 73 is for a further 2000 lots, in the control of a single developer. This has the potential to restrict and dictate the choices for the land/housing market in SW Rolleston if other options for land development are not adopted.

### **Climate Change effects**

64. A well-functioning urban area that is designed and serviced in an integrated manner, applying sound urban design principles, will enable a reduction in greenhouse gas emissions compared to unplanned, ad hoc development that does not create compact urban forms located where the services and benefits of existing, established urban areas are not readily accessible.
65. There is a triangle of planning influence that can be brought to bear on reducing greenhouse gas emissions
  - a) Compact urban form minimising distances between homes and work/play options;
  - b) Proximity of homes to community facilities, services and amenities and business/work areas; and

- c) Design and provision of movement corridors and linkages that create opportunities other than for vehicles for getting around.
- 66. The Site of this proposal
  - a) Helps in building a compact urban form to Rolleston; it squares up the township if the Plan Changes are approved and is adjoining the FDA boundary regardless.
  - b) Is located within about 3.5 km of the town centre and is convenient to Foster Park.
  - c) Is close to a public transport route and a cycleway.
- 67. The ODP for Plan Change 73 has provided linkages to the Site.
- 68. Rolleston has excellent connectivity to the City, both via the Southern Motorway Extension, a cycleway link into the City and a very regular bus service (every half hour – the standard trip takes 37 minutes and the twice daily express service, 30 minutes).

### **Positive effects**

- 69. The proposal will provide for the continued growth of Rolleston. The proposal will yield significantly more lots as GRZ than LLRZ and provide a supply buffer to on-going high level demand for lots in Rolleston and provide competition in the land market for SW Rolleston. The proposal is anticipating in 2020 a form of development that is a much more efficient use of a prime site supporting a well-functioning urban area. It is a positive endorsement of Rolleston as a growth node in the District.
- 70. There are positive economic effects accruing to land development.
- 71. From a community well-being perspective, the provision of additional land for residential growth will continue to support the Council's investment in community infrastructure by maintaining and facilitating growth rates, increasing the rating base and attracting development contributions.

### **SERVICING FOR PROPOSAL**

- 72. The development is able to be serviced sewer, water, stormwater, electricity and telecommunications. Some upgrading, for example of electricity infrastructure and road access in to the Site to Proposed District Plan standards may be required at the developer's expense. Upgrades and new services or connections can be determined when a preferred zone is adopted, and a detailed proposal for site development or subdivision is developed.
- 73. Specific servicing requirements can be determined at subdivision when the Zone is known and concept/development plans prepared.

74. Importantly, no impediments are known to exist that would prevent the servicing of the Site, and any related upgrades or new services connections that may be required in the future.
75. ECAN discharge consents including stormwater resource consents will be required for the roading network.
76. The submitters are cognizant of the need for a specific integrated Traffic Assessment to assess network capacity issues, safety matters and intersection design at the intersection of Dunns Crossing and Selwyn Roads which is marked as Key Gateway in the Rolleston Structure Plan 2009.

## **DEVELOPMENT CAPACITY**

77. Under the NPS-UD 2020 it is mandatory for every tier 1 and tier 2 local authority to prepare and make publicly available a Housing and Business Capacity Assessment (HBA) for its tier 1 and 2 urban environments every 3 years, in time to form the relevant authority's next long term plan.
78. An HBA was undertaken for the Our Space Greater Christchurch Settlement Update (2019) and it is understood that a revised HBA for Greater Christchurch is due in July 2021.
79. PC64 includes an assessment of housing land capacity. Key findings are:
  - a) 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 households compared to the PC64 estimate of 1372 households. 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 (including the Helpet sewerage plan and treatment area and the CRETs Road).
  - b) The 2028 HBA is now out of date (by two years), and there has been very high growth in the last 2 years which has met, and likely exceeded anticipated levels. Since 2010

growth has accelerated at over 5.4% per annum in Selwyn. This means that shortages projected for Selwyn in the longer term, will now occur in the medium term.

c) HBAs need to recognise that there is a 'lag time' between land being zoned for residential sections, and the delivery of housing. Once zoned, this can be in the order of 3 – 8+ years, depending on the size of the greenfield development block. It includes time for

- Land development: the process required to subdivide land, which includes earthworks, roads, infrastructure, subdivision, etc (approx. 2 or more years),
- Building development: the process of building a house, which includes design, building consent, construction, code of compliance, etc (more than a year).
- Staging: developments are generally spread over a number of stages, which minimises the costs of development and ensures that supply is released according to market demands (5 or more years)

80. PC64 proposes rezoning enough land for a further 930 households at south Rolleston. This is stated as helping meet a shortfall of a further 1710 households over and above the projected shortfall of 5475 households in the long term or 2018-2048 (as stated in Our Space Table 3 shown at para 97 (under 'Canterbury Regional Policy Statement').

81. The shortage in housing capacity in Rolleston exists now, not in a few years' time.

82. Objective 2 of the NPS-UD 2020 is

*Planning decisions improve housing affordability by supporting competitive land and development markets.*

It is imperative that land rezoned at Rolleston is held by a mix of developers. Otherwise Objective 2 will not be met. This proposal for rezoning this Site will contribute to ensuring some competition in the Rolleston market.

83. The NPS-UD definition of 'urban environment'

Means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) Is, or is intended to be, predominantly urban in character; and
- (b) Is, or is intended to be, part of a housing and labour market of at least 10, 1000 people.

84. The Greater Christchurch Area is an urban environment for the purposes of the NPS-UD, as is the Rolleston locality. LLR is a part of that urban environment.

85. The alternative relief (LLR) whether minimum average 2000m<sup>2</sup> or 5000m<sup>2</sup> lots will provide additional significant capacity given that there is currently no reasonably available LLR land

at Rolleston, and only 39 possible lots in the whole of the Greater Christchurch area (see details re supply below under 'Alternative Relief').

## **ALTERNATIVE RELIEF – LARGE LOT RESIDENTIAL**

86. LLR is a possible alternative zoning option for the Site, consistent the Commissioners' view on the 2014 RRS that this would be a suitable use 'for the future'. That future has now well and truly arrived, with residential development right down to Selwyn Road, and Dunns Crossing Road now sealed.

87. The PDP LLR zone is for a minimum average of 5000m<sup>2</sup> sites. Experience with other rural residential sites at Rolleston, including Cole Fields in north east Rolleston, is that the smallest sites are the most popular and generally sell first. This is a matter of price and also maintainability. 5000m<sup>2</sup> sites are too large, with surplus land which is difficult to maintain. Typical purchasers are looking for a large garden, potentially with a tennis court and/or outdoor pool, but do not want to undertake any form of farming.

88. Whilst LLR as a lower density form of residential development is more difficult to service with public transport, it is important that some provision is made to provide residential lifestyle choice and meet demand, consistent with the NPS-UD requirement to have or enable a variety of homes that meet the needs, in terms of type, price, and location of different households (Policy 1(a)).

89. LLR with minimum average 2000m<sup>2</sup> sites is consistent with the purpose National Planning Standard intent/purpose for the LLR as below. It is not intended to be for any form of primary production.

**Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.**

The constraint in this case, would be the peri-urban location at the rural/urban interface where a low density residential transition to rural land would be appropriate.

90. LLR here is also consistent with the PDP intent for the LLR:

### **LLRZ-Overview**

The Large Lot Residential Zone is located within township areas in Coalgate, Darfield, Dunsandel, Kirwee, Leeston, Lincoln, Prebbleton, Rolleston, Southbridge, Springfield, Tai Tapu, and West Melton.

The Large Lot Residential Zone provides an opportunity for people to enjoy a spacious living environment while being close to an urban centre. The Large Lot Residential Zone is typically located on the fringe of townships and provides a transition to the surrounding rural area.

#### LLRZ-Objectives

##### LLRZ-O1

The Large Lot Residential Zone provides for residential activity on large sites, in a manner compatible with the retention of an open and spacious peri-urban character at the rural interface.

#### LLRZ-Policies

##### LLRZ-P1

Provide for a very low density and spacious residential character by:

1. managing the density of development; and
  2. managing the height, bulk and form of development.
91. There is currently no zoning offering LLR sections in the size range proposed i.e. minimum average 2000m<sup>2</sup> lots. This is a far more desirable size than larger rural residential lots in the ½-1 ha size range and a more efficient use of land. In the context of no existing supply at all, zoning all or part of the Site LLR will add significant additional capacity.
92. There is also very limited supply of large lots in the ½ - 1 ha size range and any further supply will be significant. The Selwyn Rural Residential Strategy 2014 identifies two preferred rural residential sites at Rolleston.



A detailed map of the Rolleston 2 Def L2A area. The map shows a network of streets including:
 

- Top Left:** Oshins Road, 12, Tempson Street.
- Central Left:** Overbury Crescent, Rolleston Drive, Dryden Avenue, Beaton Drive, Martell Lane, Childe Place, Navy Loop, Straus Drive, Rolleston Drive.
- Top Right:** Area 1 (orange), Levi Road, Braemar Lane, Glenbogle Drive, Woodson Road, 1P.
- Center:** Rolleston 2 Def (pink), Branthwaite Drive, Lincoln Rolleston Road.
- Bottom Left:** L2A (green), Dunes Road, Springton Rolleston Road, Stanford Way, Ridgeway Avenue, Hopcroft Road, Shillingford Boulevard.
- Bottom Right:** Area 2 (orange), Selwyn Road.
- Other Labels:** Bronte Way, Durrell Way, Lowes Road, Goulds Road, - Drive.

Figure 7: Selwyn Rural Residential Strategy 2014 – preferred rural residential sites Rolleston

Area 1 is now fully developed and Area 2 has since become a Housing Accord Area and is in the last stages of the Acland urban residential subdivision.

The existing LLR sites at West Rolleston are now proposed for GRZ (PC73) i.e. there is no LLR zoning at Rolleston.

For the eastern Selwyn area as a whole, the RRS identifies a total of 16 preferred sites, capable of delivering 655 rural residential lots. However, all of these, except for the 3 Lincoln preferred rural residential sites (able to deliver up to 39 lots), are either fully developed or subject to plan change applications for urban residential zoning.

**Figure 25: Rural residential locations**

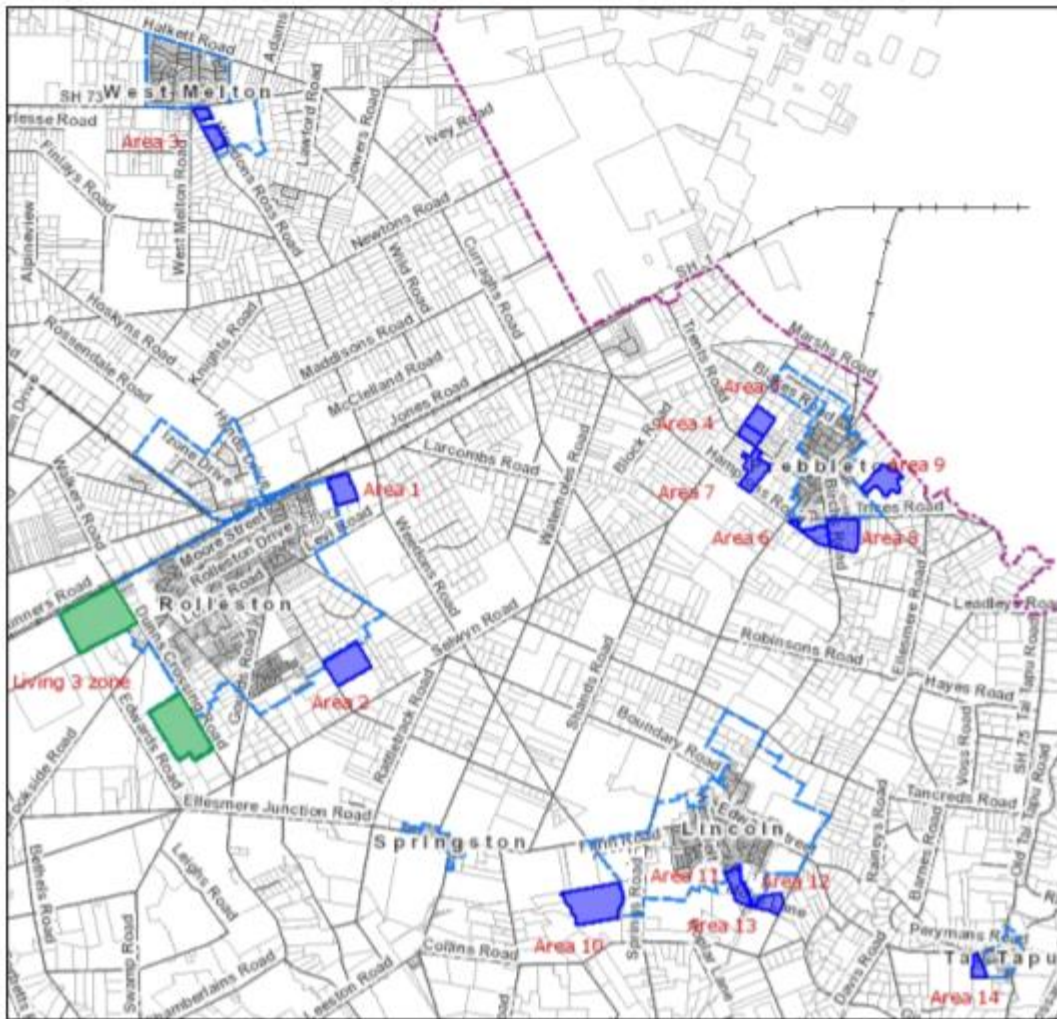


Figure 8: Rural Residential Strategy 2014 Preferred Rural Residential sites

## STATUTORY PLANNING ASSESSMENT

96. Submissions must be assessed under the provisions of the Resource Management Act 1991, including Part 2 and Section 32 (Requirements for Preparing Evaluation Reports).

## National Policy Statements

### National Policy Statement on Urban Development Capacity (NPS-UD)

97. The NPS-UD 2020 does apply to this proposal as it is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Selwyn District as part of the

Christchurch urban environment that is defined in Table 1 of the NPS, and additionally defined as

*any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.*

98. The NPS-UD 2020 recognises the national significance of:
- a) Having 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
  - b) Providing sufficient development capacity to meet the different needs of people and communities.
99. This outcome is to be achieved through these objectives
- a) Planning decisions improving housing affordability by supporting competitive land and development markets.
  - b) Regional policy statements and district plans enabling more people to live in areas of urban environments near centres or areas with employment opportunities, area well serviced by public transport or a high demand for housing in the area.
  - c) Urban environments developing and changing over time in response to diverse and changing needs of people, communities and future generations.
  - d) Local authority decisions on urban development being integrated with infrastructure planning and are strategic over the medium term and long term.
  - e) Local authority decisions on urban development are responsive particularly for proposals supplying significant development capacity.
100. The key method to achieve these objectives is by development of a Future Development Strategy (FDS). This will set out how the Councils will provide for sufficient development capacity over the next 30 years to meet expected demand. There is no FDS for the greater Christchurch Urban Area that meets the requirements of the NPS-UD 2020.
98. However, there has been work on development capacity completed for the NPS -UDC 2016 by the Greater Christchurch Partnership. This took the form of an Update of the existing Urban Development Strategy (UDS) – Our Space. This work confirmed what feasible development capacity was available to support future housing and business growth for the medium (next 10 years) and long term (10 to 30 years) periods but it is now out of date as it does not address the requirements of the NPS-UD 2020. It directed

all new growth in Selwyn District to Future Development Areas in south Rolleston  
notwithstanding that there is very little remaining development capacity at Rolleston.

NPS-UD Objective	Assessment
Objective 1: well-functioning urban environments	See 'Well functioning urban environments' above
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	<p>The Rolleston housing development market is dominated by a limited number of big companies. PC 64 is for 1000 lots &amp; Plan Change 70 is for 800 lots (both promulgated by Hughes Developments Ltd) and PC 73 is for 2000 lots.</p> <p>Additional development opportunities provides competition in the land and development markets and avoid a monopoly situation.</p> <p>There is a risk that the GRZ land supply is controlled by a limited number of large developers, who will act out of self-interest in either land-banking or staging release of land to maximise returns. Allowing smaller proposals than those identified in Plan Change 64, 70 and 73 will provide a supply of serviceable land, and provide competition to the housing/land supply market. That is giving effect to an element of the NPS-UD 2020.</p>
Objective 6: Local authority decisions on urban development that affect urban environments are integrated with servicing, strategic and responsive	The proposal will be a full urban development so engagement and agreement with the Council over services will happen; the Council has a duty to be responsive to new proposals to provide additional capacity.
NPS-UD Policy	Assessment
Policy 1 – Planning decisions for well-functioning urban environments	The development will contribute to Rolleston continuing to be a well-functioning urban environment
<p>Policy 2 - Sufficient development capacity</p> <p>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>	<p>The proposed rezoning is anticipated to provide for approximately 583 lots/houses. This represents about 9.3% of the housing stock of Rolleston in 2018 and as such represents significant additional capacity.</p> <p>A report to the 9 December Council meeting confirmed a shortfall in capacity for Selwyn in the medium term 2020-2030 of 1464 houses.</p> <p>This will mean sections will be available for the short term (up to 3 years) and into the medium term (3-10 years) if adopting a more conservative outlook.</p>

	The locational and amenity advantages of Rolleston also favour strong ongoing demand.
<p>Policy 8 – Responsiveness to plan changes</p> <p>Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-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>Proposed Change 6 to the RPS has not been notified and without an operative development capacity FDS and specific capacity bottom lines by areas this submission falls to be considered as “unanticipated” by RMA documents and “out of sequence” as the RPS does not currently provide for future urban growth consistent with NPS-UD 2020.</p> <p>The proposal on its own and in combination the neighbouring plan changes adds significantly to development capacity in Rolleston:  2018 Census: Rolleston 2018 Census 17 532 or 6261 dwellings/lots based on 2.8persons per dwelling.  Submission proposal: 583 lots/dwellings. This represents about 9.3% of the housing stock of Rolleston in 2018 and as such represents significant additional capacity</p> <p>The proposed development qualifies for consideration under this policy:</p> <ul style="list-style-type: none"> <li>• it provides significant capacity to serve expected demand for housing in Rolleston, including considerable affordable housing which is currently undersupplied</li> <li>• it as an “out-of-sequence” release of land</li> <li>• contributes to a well-functioning urban area</li> <li>• is well-connected to public transport and alternative mode routes</li> </ul>

101. This assessment confirms this re-zone proposal, to the extent proportionate to its scale, achieves those policy outcomes.
102. The absence of operative criteria in the RPS for determining what constitutes “adding significantly to development capacity” is not a bar to considering this submission on its merits. The Council can and must apply Policy 8 as from the date the NPS-UD came into effect on the basis that the purpose of Policy 8 is to facilitate rezoning to meet known housing needs.
103. Adopting the submission to re-zone the land, and enable the proposed development, at Dunns Crossing/Selwyn Roads will satisfy the objectives of the NPS-UD.

## **Proposed National Policy Statement for Highly Productive Land (NPS-HPL)**

104. The Government proposed in 2019 a NPS-HPL to prevent the loss of productive land and promote its sustainable management. The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to:
- a) Recognise the full range of values and benefits associated with its use for primary production
  - b) Maintain its availability for primary production for future generations
  - c) Protect it from inappropriate subdivision, use, and development.
105. The NPS-HPL is still a proposal and not intended to take effect until after Gazettal anticipated mid-2021. At the time this Proposed District Plan was notified, October 2020, the NPS had no effect and no assessment of it is required for the purposes of this submission.
106. The Proposed NPS-HPL interim definition of HPL is land defined as Land Use Capability Class 1-3 soils. The Site does not contain Class1-3 soils so the NPS-HPL does not apply.

## **National Planning Standards**

107. The National Planning standards prescribe various matters under the RMA so that there is consistency among planning documents most relevantly here in terms of appellations for zones, and the standards applying to these zones.
108. The proposal here needs to adopt a standard zone appellation, in this case General Residential and Large Lot Residential.
109. The Proposed Plan set out plan standards for minimum and average lot sizes for the respective zones. These can be adopted for this proposal.

## **Canterbury Regional Policy Statement (RPS)**

Relevant Objectives and Policies:

110. Chapter 6 of the RPS “*provides a resource management framework for the recovery of Greater Christchurch, to enable and support recovery and rebuilding, including restoration and enhancement, for the area through to 2028. Recovery in Greater Christchurch is also supported by the provisions in Chapter 5 notated as ‘Entire Region’.* The provisions in the

*remainder of the RPS also apply.<sup>1</sup> “*

111. Chapter 6 was amended in 2019 with the insertion of housing capacity targets for the period 2018-2048 (Table 6.1 below).

**6.2.1a Targets for sufficient, feasible development capacity for housing [Inserted in accordance with sections 55(2) and 55(A) of the Resource Management Act 1991, from the National Policy Statement on Urban Development Capacity 2016]**

For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.

Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048

	Development capacity to be enabled (number of dwellings)		
	Medium Term <sup>1</sup> (2018-2028)	Long Term <sup>2</sup> (2028-2048)	Total 30 Year Period (2018-2048)
Christchurch City	17,400	38,550	55,950
Selwyn	8,600	8,690	17,290
Waimakariri	6,300	7,060	13,360
Greater Christchurch	32,300	54,300	86,600

<sup>1</sup>NPS-UDC, Policy PA1: Development capacity must be feasible, zoned and either serviced with development infrastructure, or the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002 (NPS-UDC, PA1).

<sup>2</sup>NPS-UDC, Policy PA1: Development capacity must be feasible, identified in relevant plans and strategies, and the development infrastructure required to service it must be identified in the relevant Infrastructure Strategy required under the Local Government Act 2002 (NPS-UDC, PA1).

112. The Table 6.1 targets were required under the National Policy Statement – Urban Development Capacity 2016 (NPS-UDC). Minimum targets for sufficient feasible development capacity for housing for the medium term (3-10 years) and long term (10-30 years) must be set by regional councils and included in their RPS (Policy PC5). Development capacity must be sufficient to meet housing demand which reflects needs for different types and locations of development and feasible ie commercially viable. It is based on the zoning and other applicable plan provisions, and there must be adequate infrastructure to support development.
113. The Table 6.1 targets were based on work undertaken for Our Space (see discussion above). Our Space identified existing housing development capacity in Selwyn District of 9725 households, and a shortage of capacity in the long term of 5475 households (see Table 3 below).

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<sup>1</sup> RPS Introduction  
2107 Dunns Crossing Road Submission



Table 3: Sufficiency of housing development capacity in Greater Christchurch against Housing Targets, 2018 - 2048

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity	
			Medium Term (2018–2028)	Medium and Long Term (2018–2048)
Christchurch City	59,950*	55,950	+ 38,875	+ 4,000
Selwyn	9,725**	17,290	+ 1,825***	- 5,475***
Waimakariri	4,200**	13,360	- 1,600***	- 7,675***
<b>Greater Christchurch</b>	<b>73,875</b>	<b>86,600</b>	<b>+ 39,100***</b>	<b>- 9,150***</b>

Note: Capacity figures included in the table represent number of dwellings (numbers have been rounded to the nearest 25).

In the medium term, capacity for around 3,500 dwellings in Christchurch is constrained by the provision of necessary infrastructure.

Sufficiency of housing development capacity will be reviewed and published as further feasibility modelling and investigation is completed.

These housing targets include the additional capacity margins required by the NPS-UDC as shown in Table 1.

\* Alternative modelled scenarios documented in the Capacity Assessment, which are based on less favourable assumptions, identified development capacity for approximately 52,675 or 36,400 dwellings.

\*\* These capacity figures are derived from a qualitative assessment of greenfield land only. An alternative modelled scenario, including existing zoned land and incorporating changes in prices and costs over time, identified development capacity for the long term of approximately 9,200 dwellings in Selwyn and 6,100 dwellings in Waimakariri.

\*\*\* These sufficiency figures have been adjusted to discount the demand over the medium and long term likely to be met through uptake of development in rural zoned areas (averaging 70 dwellings/year for Selwyn and 50 dwellings/year for Waimakariri). Demand met through capacity in rural areas will be reviewed following the review of rural zoning as part of respective District Plan Reviews in Selwyn and Waimakariri.

114. The NPS-UDC targets were intended to be ‘minimums’ not ‘maximums’. They were added under s55 of the RMA without any opportunity for challenge through the normal RMA submissions, hearing and appeals process. The overall intent of the NPS-UDC was to ensure planning decisions actively enabled urban development in a way that maximized wellbeing now and in the future. This included by providing plenty of opportunities for development, and thus contributing to a competitive land and development market and lower house prices<sup>2</sup>.
115. Our Space recognizes that the greenfield priority areas on RPS Map A are not adequate to supply housing capacity requirements in the long term for Selwyn District, (and medium and long term in Waimakariri District). It recommends Future Development Areas (marked orange on Our Space Fig 16) (**Figure 9**). The only FDA in Selwyn District is at Rolleston. However, importantly, the FDAs are indicative only, and intended to “provide some direction to future RMA processes.”

<sup>2</sup> NPS-UDC Introduction  
2107 Dunns Crossing Road Submission



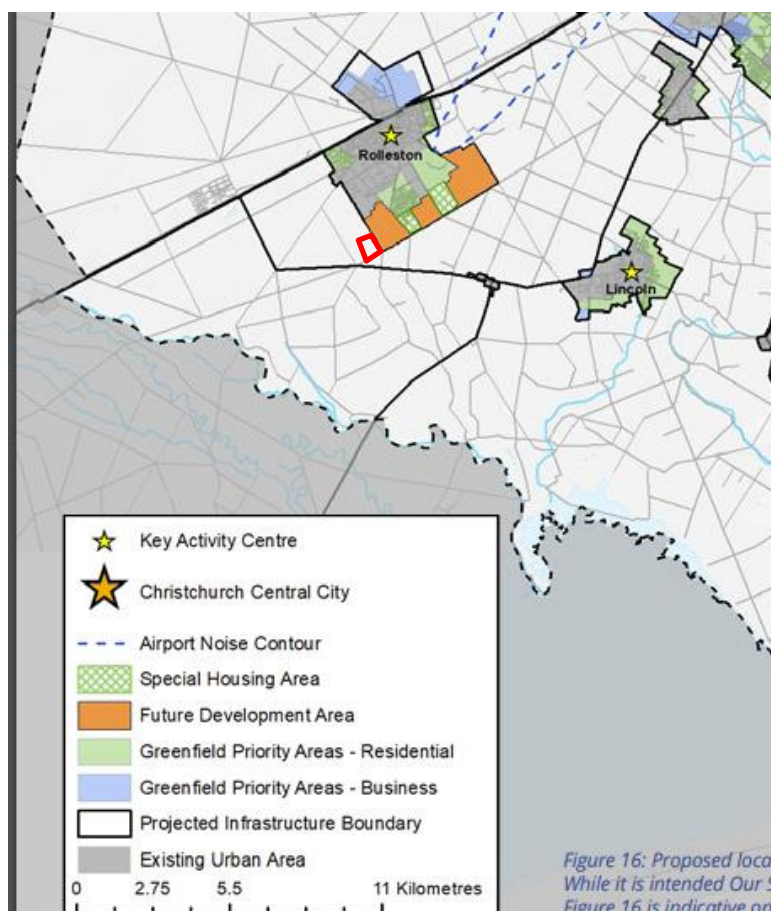


Figure 16: Proposed local  
While it is intended Our S  
Figure 16 is indicative on

Figure 9: Our Space Figure 16 Proposed Development Areas. Site outlined in red (appx location)

116. Our Space anticipated a change to the RPS in 2019 which *“would ensure that land can be rezoned to meet medium term capacity needs, and the longer term will be considered as part of the comprehensive review of the CRPS scheduled for 2022.”*<sup>3</sup>
117. A draft RPS plan change was prepared but has not proceeded because the NPS-UDC has been replaced by the NPS-UD (Gazetted August 2020), and this changes the policy framework for any RPS change.
118. Given all of the above, the current RPS is not consistent with the NPS-UDC or its replacement, the NPS-UD 2020. It retains a ‘hard and fast’ urban/rural boundary line which predates both NPSs and there is no ability to rezone land outside the Map A greenfield priority or existing urban areas.<sup>4</sup> Even if parts of the FDA areas are added to meet minimum targets for medium term needs, this does not enable Councils to consider proposals which

<sup>3</sup> CRPS, Chapter 6 Section 5.3

<sup>4</sup> CRPS Policy 6.3.1.4 is *“ensure urban activities only occur within existing urban areas or identified greenfield priority areas on Map A, unless they are otherwise expressly provided for in the CRPS.”*

contribute further capacity above those 'minimums'.

119. One of the key changes in the NPS-UD 2020 is that local authority decisions on urban development that affects urban environments are responsive, particularly to proposals that would supply significant additional capacity.<sup>5</sup> It also amends the required methodology for housing and business capacity assessments.
120. The current RPS does not meet the new NPS-UD 2020 requirement in relation to proposals for significant additional capacity. Regional councils are required to include criteria in the RPS to determine what plan changes will be treated for the purposes of Policy 8 as adding significantly to development capacity<sup>6</sup> as soon as practicable.<sup>7</sup> ECAN has yet to respond to this requirement.
121. The NPS-UD 2020 has immediate effect, so in the meantime, proposals (such as this submission) must interpret 'significant development capacity' in the context of the overall intent and purpose of the NPS-UD 2020 as articulated in the NPS-UD 2020 objectives and policies. This includes that NZ has well-functioning environments; provides sufficient development capacity to meet the different needs of people and communities; planning decisions improve housing affordability to contributing to competitive house and land markets; and RMA plans enable more people to live near major employment areas, where there is existing or planned public transport, and where there is high demand for housing.
122. The NPS-UD 2020 is the higher order document and its requirements override those of lower order documents where there is a conflict, including regional and district RMA plans.
123. An assessment of this proposal against the relevant RPS Objectives and Policies is set out in **Appendix 1**. This should be read in the context of the above assessment of the current 'weight' to be afforded to the RPS.
124. That assessment shows that
  - a) The development proposal achieves the objectives for the location, design and function of new developments
  - b) The traffic effects of the proposal need further investigation and an ITA can be supplied. The capacity of the local road network including intersections is addressed in PC73.
  - c) There is a fundamental inconsistency with Map A of Chapter 6 but is consistent with the approach of the NPS-UD 2020 for significant development capacity.

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<sup>5</sup> NPS-UD Objective 6c) and Policy 8

<sup>6</sup> NPS-UD Clause 3.8(3)

<sup>7</sup> NPS-UD Clause 4.1(4)

- d) The environmental effects assessment included with the PSDP submission establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11 (subject to comments above regarding strategic roading). These matters are:

#### **6.2.1 Recovery framework**

*Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:*

- 1. identifies priority areas for urban development within Greater Christchurch;*
- 2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;*
- 3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS*
- 4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;*
- 5. protects and enhances indigenous biodiversity and public space;*
- 6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;*
- 7. maintains the character and amenity of rural areas and settlements;*
- 8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;*
- 9. integrates strategic and other infrastructure and services with land use development;*
- 10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;*
- 11. optimises use of existing infrastructure; and*
- 12. N/A*

- e) The proposal achieves policies relating to
- Urban form and settlement patterns
  - Sustainability
  - Integration of transport infrastructure and land use
  - Development within Greater Christchurch
  - Urban design
  - Residential location and yield
  - Biodiversity, natural hazards, landscape, soils, contaminated land.

#### **Land and Water Regional Plan**

125. An assessment of this proposal against the relevant Regional Plan Objectives and Policies is set out in **Appendix 2**.
126. That assessment shows that the proposal is entirely consistent with the relevant objectives and policies.

127. The proposal achieves objectives relating to land uses responding to socio-economic and community demand (in this case for more housing), sustainability of ground water resources, minimising contamination of soils, and protecting the region's fresh water resources.
128. The proposal is consistent with policies seeking:
- a) No direct discharges to water; stormwater is to ground.
  - b) Sewage will be collected and managed in a reticulated system built to Council specifications.
  - c) The site will be developed subject to subdivision consent(s) that will impose necessary conditions about earthworks during construction including sediment control plans.
  - d) A geotechnical assessment at subdivision will confirm that the Site is suitable for intended residential use.
129. The Policy requirement for a stormwater management plan can be addressed at subdivision stage.

### **Selwyn Proposed District Plan**

130. An assessment of this proposal against the relevant Proposed District Plan Objectives and Policies as notified on 5 October 2020 is set out in **Appendix 3**.
131. That assessment shows that the proposal is entirely consistent with the relevant objectives and policies noting that the proposal is inconsistent with UG-P3 but only because higher order planning documents have not been updated in line with NPS-UD 2020. With respect to urban growth, the proposal is not consistent with UG-P3 because the Site is not within an Urban Growth Overlay.
132. The proposal achieves policies relating to
- a) Strategic directions with respect to
    - Compact and sustainable towns
    - Urban growth and development
    - Integration of land use and infrastructure.
  - b) Contaminated land and natural hazards.
  - c) Subdivision outcomes.
  - d) Urban growth with respect to
    - Achieving attractive, pleasant, high quality, and resilient urban environments
    - Consolidated and compact urban forms

- Sufficiency of feasible housing capacity
  - e) Development being supported by a development plan (to be supplied).
  - f) Urban form and scale outcomes.
  - g) Integration with existing urban environments, and optimise the efficient and cost-effective provision of infrastructure.
133. Importantly the proposal meets the objectives of UG-01 relating to the qualities and characteristics of urban growth identified in clauses 1 – 8:
- Urban growth is provided for in a strategic manner that:*
1. *Achieves attractive, pleasant, high quality, and resilient urban environments;*
  2. *Maintains and enhances the amenity values and character anticipated within each residential, kainga nohoanga, or business area;*
  3. *Recognises and protect identified Heritage Sites, Heritage Settings, and Notable Trees;*
  4. *Protects the health and well-being of water bodies, freshwater ecosystems, and receiving environments;*
  5. *Provides for the intensification and redevelopment of existing urban sites;*
  6. *Integrates with existing residential neighbourhoods, commercial centres, industrial hubs, inland ports, or knowledge areas;*
  7. *Is coordinated with available infrastructure and utilities, including land transport infrastructure; and*
  8. *Enables people and communities, now and future, to provide for their wellbeing, and their health and safety.*
134. The assessment concludes that with respect to development capacity (UG-P13) the current RPS is not consistent with the NPS-UDC or its replacement, the NPS-UD 2020. It retains a 'hard and fast' urban/rural boundary line which predates both NPS's. The NPS-UD 2020 has immediate effect, so proposals (such as this submission) must interpret 'significant development capacity' in the context of the overall intent and purpose of the NPS-UD 2020 as articulated in the NPS-UD objectives and policies rather than the out of step/out of date RPS provisions. That said, the proposed development is consistent with all the matters listed in RPS Policy 6.2.1 clauses 4. to 11. as set out at para 116.
135. This submission seeks a change to Policy UG-P13 to bring it 'in line' with the requirements of the NPS-UD 2020.

## **ASSESSMENT AGAINST OTHER PLANNING DOCUMENTS**

### **Our Space 2018-2048 Greater Christchurch Settlement Update (2019)**

136. Our Space is a non-statutory document prepared under the Local Government Act. It

*“responds to the new Government Policy Statement on Land Transport, which has increased funding for mass public transit schemes, and meets the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 to prepare a*

*future development strategy.... Specifically, it:*

- *sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;*
- *identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;...*
- *promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.<sup>8</sup>.*

*..Underpinning this settlement pattern approach is the vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle.*

137. Our Space acknowledges that this will require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services. To date, there has been no successful business case for improved public transportation, including not as a Covid 19 fast track infrastructure project.
138. The Our Space housing capacity targets (Table 3) and Future Development Areas are reproduced above (under 'Canterbury Regional Policy Statement').
139. Our Space, like the RPS (and Operative District Plan) are now out of date, as they do not reflect or give effect to the new requirements of the NPS-UD 2020.

### **Rolleston Structure Plan 2009**

129. A Structure Plan was adopted by the Council in 2009.

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<sup>8</sup> Our Space Executive Summary  
2107 Dunns Crossing Road Submission



Figure 5.2: Rolleston Structure Plan



Figure 10: Rolleston Structure Plan 2009. Site outlined in red.

130. The Structure Plan was a planning product for its time. It has provided a comprehensive and integrated proposal for coordinating rapid growth. A decade on it clearly needs review if it is to remain relevant and to take Rolleston in to the next decade or longer. The pace of change and development in Rolleston has meant that the “long view” has largely been delivered in 2020.
131. The Census data shows that Rolleston is almost doubling its population every five years.

<b>2006 (count)</b>	<b>2013 (count)</b>	<b>2018 (count)</b>
4959	9555	17,499

Statistics NZ: Rolleston Central/NE/NW/SE/SW

132. The Structure Plan was based on assumptions that its 7000 population in 2009 would grow to 20,000 over 35 years (Background). That 35 year assumption has largely been delivered by 2020.
133. The effect of this unparalleled growth is that
  - a) The Plan usefully speaks to developments within the Structure Plan boundary but provides no commentary or direction about growth beyond those boundaries
  - b) The Plan no longer provides adequate planning lead-in time to facilitate on-going urban development if growth continues apace.
  - c) The regional planning strategy is also well out of step with this growth and can no longer help shape responses to proposals for growth.
134. The Rolleston Structure Plan should not be a hurdle for new private proposals as it does not deliver NPS-UD outcomes, and is the antithesis now of providing flexible planning responses to “out-of-sequence” proposals that add significant development capacity.

### **Mahaanui Iwi Management Plan**

140. The Mahaanui Iwi Management Plan (MIMP) 2013 was released on 1 March 2013. It was prepared by the six Papatipu Rūnanga of the takiwā that extends from the from the Hurunui River in the north, to the Hakatere/Ashburton River in the south, inland to Kā Tiritiri o Te Moana (the Southern Alps), and including Te Pātaka o Rākaihautū (Banks Peninsula), and the coast.
141. The MIMP is a tool for tangata whenua to express their identity as manawhenua and their objectives as kaitiaki, to protect their taonga and resources, and their relationships with these. The MIMP seeks to ensure that these taonga and resources are recognised and protected in the decision-making of agencies with statutory responsibilities to tangata whenua. Importantly it is also a tool that assists Papatipu Rūnanga representatives to articulate their values, issues and policy into statutory processes.



142. The MIMP includes both general objectives and policies about the management of land, air, and water, and also includes region specific objectives and policies. Under section 74(2A) of the RMA, the Council must take into account any such plan to the extent that it has a bearing on the resource management issues of the District.
143. With respect to general objectives and policies the proposal and application site will not affect landscapes, or sites of cultural heritage or significance (Chapter 5.8). The Site does not contain any areas of significant biodiversity, and the proposal seeks to include landscaping within the reserves, and in road corridors adding to the overall biodiversity of the Canterbury Plains consistent with Chapter 5.5 of the MIMP.
144. The proposal provides for full urban reticulation of the three waters and is consistent with the objectives and policies contained in Chapters 5.3 and 5.4 of the MIMP. The proposal does not preclude individual land owners from installing rainwater collection and use from roof areas at the time of building development.
145. Chapter 6.11 is the area specific section for the Te Waihora area and has a key theme of Ki Uta Ki Tai (from the mountains to the sea) with respect to effects on Te Waihora/ Lake Ellesmere. The proposal has been designed taking into consideration the potential effect of resultant subdivision and development on the rivers and streams that flow into Te Waihora/Lake Ellesmere.
146. There are no identified sites of significance within the Site, nor are there any known areas of mahinga kai. The Site has a long history of use for lifestyle, and grazing purposes.
147. Overall it is considered that the proposal will not have adverse impact on the cultural values of iwi as set out within the MIMP.

## **SECTION 32 ASSESSMENT**

148. A full Section 32 assessment is contained in **Appendix 4**.
149. In summary, the PDSP zoning and associated rules (General Rural Zone with a minimum lot size for subdivision and a dwelling 4ha) do not reflect the present farming use on the Site.
150. The Proposed District Plan does not provide for new development areas shown in Figure 16 Our Space by zoning the land for GRZ; it shows those blocks as subject to Urban Growth Overlays.
151. Neither General Rural nor Large Lot Residential is an efficient use of this block of land located as it is close to the urban area of Rolleston, and in a location highly accessible to

the town centre by active transport modes as well as car (it is within easy walking and cycling distance). The Submitters note, too the Selwyn Council staff view of not supporting LLRZ for land in this area, preferring full residential zoning.

152. If this Site is not zoned for General Residential use to enable residential development then it will drive pressure to re-zone elsewhere, and potentially without the significant benefits to Rolleston long term in relation to enabling a well-functioning urban environment that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Additionally re-zoning to General Residential (56 ha) contributes to providing additional development capacity to meet the different needs of people and communities in a planned manner and consistent with the NPS-UD.
153. The Site can readily be developed to reflect the principles of the Urban Design Protocol with values of character, context, and connectivity. It has the scale and shape to facilitate that approach.
154. The Section 32 assessment concludes that the proposal to re-zone the Site from Rural Zone to Residential General Zone is the most appropriate method for achieving the objectives of the proposal, than the other alternatives considered.
155. Option 2 is consistent with a range of District Plan policies notwithstanding that it does not sit square with the strategic intention signalled in Rolleston Structure Plan 2010.
156. Option 2 to re-zone the site for two different residential densities is the most appropriate given:
  - a) The proposals adopt the proposed District Plan zone, and development and activity standards. This ensures continuity of District Plan anticipated environmental outcomes and urban amenity for Rolleston and adjoining residential areas;
  - b) Will be consistent with and give effect to the relevant Proposed District Plan objectives and policies;
  - c) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere in the General Rural Inner Plains Zone;
  - d) There is no additional cost to the Council in re-zoning the Site land in this proposal as there is capacity in the public utilities and the existing road network, including planned upgrades, will accommodate the traffic effects of about 583 households.
157. The inclusion of the Residential Zones in the proposal is considered to be appropriate to achieve the long term sustainable growth and development of Rolleston.

158. The economic, social and environmental benefits of the proposal outweigh any potential costs.
159. The overall efficiency and effectiveness of the proposal is high, in comparison the alternative options which are low (Options One and Four) or low to moderate (Option Three).
160. The proposal is considered to be the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.

## **CONCLUSION**

161. The submission seeks to rezone 56 ha of land adjoining Rolleston from Inner Plains Zone to General Residential.
162. The Site has a history of dryland farming use and is not restricted by potential natural hazards, sites of significance to iwi, there are no water bodies or rivers. The Site is close to the urban area of Rolleston, and is well located to join in to Council utility services. It is well suited for conversion to residential use.
163. The Site is in a location that achieves compact town growth if the nearby Plan Changes are approved, offering ease of access to business services, community facilities, reserves and the primary road network. Even if not approved, it is a logical growth direction for Rolleston, adjoining FDA land and onto low productivity low value soils. In this case, it would be an ideal location for LLR development, of which there is currently no remaining provision at Rolleston.
164. The proposal provides the potential for a connected and high amenity residential living environment while avoiding and/or mitigating any potential adverse effects on the environment. It will provide for continuing high demand for a variety of residential sections at the District Centre, which offers a wide range of community and commercial services and facilities. It will broaden the range of housing available.
165. The use of this Site for residential purposes has been demonstrated through this submission to be a sustainable and efficient use of land and infrastructure. The rezoning better provides for the social, economic, environmental well-being of the Rolleston community than continuation of the current low intensity lifestyle land use, or any form of large lot/low density residential use.
166. The potential adverse effects of the implementation of the proposed zoning have been described in this submission.

167. Rezoning of the site to General Residential Zone is consistent with the policies and objectives of the PSDP and the CRPS, except those relating to urban growth which are out of line with the NPS-UD 2020, in particular a restrictive urban growth approach based on meeting but not exceeding minimum anticipated housing land capacity targets and an 'immovable' urban/rural boundary line.
168. As the proposal helps achieve the purpose of the RMA, and has been shown to be consistent with the relevant provisions of the NPS-UD 2020, and the relevant regional and district policies and plans, it can be adopted by Selwyn District Council.

A handwritten signature in black ink, appearing to be 'T. D. A. A.', is written on a white rectangular background.

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

Date: December 10, 2020

**Appendices:**

- Appendix 1: Assessment of Canterbury Regional Policy Statement Objectives and Policies
- Appendix 2: Assessment of Land and Water Plan Objectives and Policies
- Appendix 3: Assessment of Selwyn Proposed District Plan Objectives and Policies
- Appendix 4: Section 32 Assessment

**Figures:**

- Figure 1: The site (outlined in red)
- Figure 2: Proposed Plan Change 70 Site
- Figure 3: Map A Chapter 6 Regional Policy Statement Greenfield Priority areas
- Figure 4: Proposed District Plan Zoning
- Figure 5: Plains Flood Management Overlay
- Figure 6: PC 73 Outline Development Plan
- Figure 7: Selwyn Rural Residential Strategy Preferred Rural Residential Sites: Rolleston
- Figure 8: Selwyn Rural Residential Strategy Preferred Rural Residential Sites
- Figure 9: Our Space Figure 16 Proposed Development Areas
- Figure 10: Rolleston Structure Plan

## Appendix 1: Assessment of Regional Policy Statement Objectives and Policies

### Dunns Crossing Road Re-zone Submission

**Note:** Chapters not relevant

Chapter 7 - Fresh Water

Chapter 8 - The Coastal Environment

Chapter 10 - Beds of Rivers and Lakes and their Riparian Zones

Chapter 13 - Historic Heritage

Chapter 14 - Air Quality


Chapter 16 - Energy

Chapter 18 - Hazardous Substances

Chapter 19 - Waste Minimisation and Management

Objective/Policy	Assessment
<p><b>CHAPTER 5- LAND-USE AND INFRASTRUCTURE</b></p> <p><b>5.2 OBJECTIVES</b></p> <p><b>5.2.1 Location, design and function of development (Entire Region)</b></p> <p>Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"><li>1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and</li><li>2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:<ol style="list-style-type: none"><li>a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;</li><li>b. provides sufficient housing choice to meet the region's housing needs;</li><li>c. encourages sustainable economic development by enabling business activities in appropriate locations;</li><li>d. minimises energy use and/or improves energy efficiency;</li><li>e. enables rural activities that support the rural environment including primary production;</li></ol></li></ol>	<p>The Site is on the southwestern edge of Rolleston, and close by the proposed Plan Change 64, 70 and 73 sites. It will achieve consolidated, well designed and sustainable growth in and around the existing Rolleston urban area either as a stand-alone development, or in combination with those Plan Changes.</p> <p>It is a logical extension of a well-established township that has undergone significant planned and managed recent growth that is well designed and connected with the existing urban areas creating sustainable suburban communities.</p> <p>This proposed rezoning and associated provisions will continue that approach.</p> <p>The proposal will enable the Greater Christchurch community to provide for their social, economic and cultural wellbeing through provision of additional housing as part of an established town. The development will serve a current demand and need, i.e. a short to medium term need that, once established, will form part of the housing stock and supply for the benefit of future generations.</p> <p>With respect to clause 2:</p> <ol style="list-style-type: none"><li>1. There are no areas within the land to be rezoned which have particular or significant natural values, nor is there any significant regional infrastructure.</li><li>2. The area being rezoned has as its primary purpose the provision of housing choice for people and communities.</li><li>3. The rezoned land is conveniently located to the centre of Rolleston (3 km away) and local facilities and amenities.</li><li>4. The land being rezoned is currently used for limited primary production and dryland farming purposes.</li></ol>

<p>f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;</p> <p>g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;</p> <p>h. facilitates the establishment of papakāinga and marae; and</p> <p>i. avoids conflicts between incompatible activities</p>	<p>5. There is no prospect of conflicts between incompatible uses as the Site adjoins urban land used residentially potentially on two sides.</p>
<p><b>5.3.7 Strategic land transport network and arterial roads (Entire Region)</b></p> <p>In relation to strategic land transport network and arterial roads, the avoidance of development which:</p> <ol style="list-style-type: none"> <li>1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and</li> <li>2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements</li> </ol>	<p>An Integrated Traffic Assessment will be required at subdivision to evaluate the effects of the proposed residential development on the existing roading network.</p> <p>The road environment and frontages adjoining the Site will be changed from rural to urban with wider carriageways and urban formation including kerbs and footpaths. Speed limits will be reduced to urban speeds to maintain consistency for road users. The footpaths will provide for walking and cycling infrastructure will also serve these areas, providing safe routes to schools and other facilities.</p> <p>The traffic effect of the proposed development is considered to be likely less than minor and is not of a scale with regional significance.</p> <p>The rezoning will be consistent with Objective 5.3.7.</p>
<p><b>RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH</b></p> <p><b>6.2 OBJECTIVES</b></p> <p><b>6.2.1 Recovery framework</b></p> <p><i>Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</i></p> <ol style="list-style-type: none"> <li>1. identifies priority areas for urban development within Greater Christchurch;</li> <li>2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;</li> <li>3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;</li> <li>4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;</li> </ol>	<p>This Objective is largely given effect to by Map A of Chapter 6 RPS and Policy 6.3.1.</p> <p>However this Objective is focussed on setting up a recovery framework after the Christchurch earthquakes on the basis of the anticipated demand primarily created by the recovery and rebuilding process immediately following the Canterbury earthquakes. That process is largely complete and the planning issue now is on creating the opportunity to reconsider future needs associated with natural growth in the population and their housing needs.</p> <p>While the proposed rezoning is for a site not consistent with this policy in regard to Map A, and it is not included in Figure 16 of Our Space as a FDA (below), it is still a tenable proposition for re-zoning when the RPS is reviewed to reflect the new urban growth planning drivers of the NPS-UD 2020 (Objective 6c) and Policy 8).</p>

<ol style="list-style-type: none"> <li>5. <i>protects and enhances indigenous biodiversity and public space;</i></li> <li>6. <i>maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;</i></li> <li>7. <i>maintains the character and amenity of rural areas and settlements;</i></li> <li>8. <i>protects people from unacceptable risk from natural hazards and the effects of sea-level rise;</i></li> <li>9. <i>integrates strategic and other infrastructure and services with land use development;</i></li> <li>10. <i>achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;</i></li> <li>11. <i>optimises use of existing infrastructure; and</i></li> <li>12. <i>N/A</i></li> </ol>	 <p>The environmental effects assessment included with the PSDP submission establish that the proposed development is consistent and will not give rise to any concerns with respect to all the matters listed in 4. to 11.</p>
<p><b>6.2.2 Urban form and settlement pattern</b>  <i>The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:</i></p> <ol style="list-style-type: none"> <li>1. <i>aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:</i> <ol style="list-style-type: none"> <li>a. <i>35% averaged over the period between 2013 and 2016</i></li> <li>b. <i>45% averaged over the period between 2016 to 2021</i></li> <li>c. <i>55% averaged over the period between 2022 and 2028;</i></li> </ol> </li> <li>2. <i>providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas and brownfield sites;</i></li> </ol>	<p>The Site forms a logical extension to Rolleston and will provide a compact and consolidated urban form for the town, linking with the PC 64, 70 and 73 proposals to extend the existing urban area.</p> <p>The Proposed Selwyn District Plan identifies Future Development Areas as subject to Urban Growth Overlays to cater for known and future urban growth (these are FDAs in Figure 16 Our Space ) so to that extent the Site is unplanned but is consistent with the Policy intent of the NPS-UD 2020 Policy 8 where Councils are expected to be responsive to plan change requests that would contribute to well-functioning urban environments and supply significant additional capacity.</p> <p>Additional capacity to match the needs for housing over the 10 year life of the District Plan will provide a necessary foundation to enable future growth. The Dunns Crossing/Selwyn Roads proposal will better enable the intent of subclause 5 of the Policy in encouraging sustainable and self-sufficient growth of Rolleston.</p> <p>The Site will meet a minimum density of 12 households per ha which is higher than the existing dwelling density at Rolleston (10 hh/ha for LZ areas and less for other existing urban areas). Development will include medium density lots and will contribute to a greater range of housing types at Rolleston.</p>



<ol style="list-style-type: none"> <li>3. <i>reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;</i></li> <li>4. <i>providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;</i></li> <li>5. <i>encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;</i></li> <li>6. <i>N/A Rural Residential</i></li> <li>7. <i>N/A Maori Reserves</i></li> </ol>	<p>Infrastructure capacity to service the proposal at urban residential standards is anticipated given it is close to the Projected Infrastructure Boundary.</p>
<p><b>6.2.3 Sustainability</b>  <i>Recovery and rebuilding is undertaken in Greater Christchurch that:</i></p> <ol style="list-style-type: none"> <li>1. <i>provides for quality living environments incorporating good urban design;</i></li> <li>2. <i>retains identified areas of special amenity and historic heritage value;</i></li> <li>3. <i>retains values of importance to Tāngata Whenua;</i></li> <li>4. <i>provides a range of densities and uses; and</i></li> <li>5. <i>is healthy, environmentally sustainable, functionally efficient, and prosperous.</i></li> </ol>	<p>The Assessment of Environmental Effects addresses the matters of good urban design, densities and uses and the adoption of sustainable infrastructure services consistent with this objective. The proposal will create quality living environments that will be functionally efficient with linkage and road access in to the existing and possible future urban fabric of Rolleston.</p>
<p><b>6.2.4 Integration of transport infrastructure and land use</b>  <i>Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:</i></p> <ol style="list-style-type: none"> <li>1. <i>managing network congestion;</i></li> <li>2. <i>reducing dependency on private motor vehicles;</i></li> </ol>	<p>The Integrated Traffic Assessment to be provided at subdivision stage (or before) will demonstrate that the Site has been designed to satisfy the requirements of this Policy. It offers a benefit to PC73 proposed development, in that provides for a link through to Selwyn Road, rather than all access being onto Dunns Crossing Road.</p>


<ol style="list-style-type: none"> <li>3. <i>reducing emission of contaminants to air and energy use;</i></li> <li>4. <i>promoting the use of active and public transport modes;</i></li> <li>5. <i>optimising use of existing capacity within the network; and</i></li> <li>6. <i>enhancing transport safety.</i></li> </ol>	
<p><b>6.3 POLICIES</b></p> <p><b>6.3.1 Development within the Greater Christchurch area</b></p> <p><i>In relation to recovery and rebuilding for Greater Christchurch:</i></p> <ol style="list-style-type: none"> <li>1. <i>give effect to the urban form identified in <a href="#">Map A</a>, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;</i></li> <li>2. <i>give effect to the urban form identified in <a href="#">Map A</a> (page 6-27) by identifying the location and extent of the indicated Key Activity Centres;</i></li> <li>3. <i>enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;</i></li> <li>4. <i>ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on <a href="#">Map A</a>, unless they are otherwise expressly provided for in the CRPS;</i></li> <li>5. <i>N/A educational facilities in rural areas</i></li> <li>6. <i>N/A metropolitan recreation facility and</i></li> <li>7. <i>avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.</i></li> </ol>	<p>Map A was prepared to provide a focus for priority development as part of the earthquake recovery phase. That is now past.</p> <p>The lack of consistency of the requested Submission with the current version of Map A is a function of timing.</p> <p>It is quite moot as to the priority areas needed to meet present and foreseeable future housing demand in general in Greater Christchurch, and in Rolleston. A Change to the RPS is anticipated to include Future Development Areas (indicative only, but only providing for additional growth at Rolleston) as proposed in Our Space, but also to address the new NPS-UD 2020 which may require a revisit of the FDAs. A full review is scheduled for 2023.</p> <p>However, decisions are required now and should not be fettered by a planning control that has served its purpose but is not addressing the urban growth needs of Greater Christchurch for the period 2020-2030 (the statutory life of the District Plan). Whilst the RPS greenfield priority areas are for the period up to 2028, and the housing targets for the period 2018-2048, they are clearly inadequate to meet housing demand at Rolleston.</p> <p>The Site is not in a random, remote greenfields location that would challenge the integrity and consistency of the present RPS policy of favouring outward growth around existing urban areas. The growth enabled by the proposal contributes to compact and consolidated urban forms, and where appropriate connectivity to existing areas can be developed.</p> <p>The proposal can be seen as implementing Policy 8 NPS-UD 2020 and is now a live proposition to avoid a delay in meeting housing demand at Rolleston. Not moving now in to the statutory re-zone process will create a delay of a minimum of two years from when the District Plan is made operative. If that happens then there will be a severe shortage of development land at Rolleston, which will in turn exacerbate housing pressure including on price of land and houses.</p>
<p><b>6.3.2 Development form and urban design</b></p> <p><i>Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and</i></p>	<p>The development will be managed through a development plan.</p> <p>The assessment of environmental effects concludes that the Site to be rezoned will achieve a high level of amenity and efficiency for residents and for the neighbourhood.</p>

<p><i>those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:</i></p> <ol style="list-style-type: none"> <li><i>1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.</i></li> <li><i>2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.</i></li> <li><i>3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of</i></li> <li><i>4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.</i></li> <li><i>5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.</i></li> <li><i>6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.</i></li> <li><i>7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of</i></li> </ol>	<p>The submission is consistent with, and will give effect to, the outcomes sought by this Policy.</p>
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<p><i>new urban areas in the Christchurch region.</i></p>	
<p><b>6.3.3 Development in accordance with Outline Development Plans</b>  <i>Development in greenfield priority areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will: (list of specific matters)</i></p>	<p>The development will be managed through a development plan.</p> <p>The proposal is consistent with, and will give effect to, the outcomes sought by this Policy.</p>
<p><b>6.3.4 Transport effectiveness</b>  <i>Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:</i></p> <ol style="list-style-type: none"> <li>1. <i>avoiding development that will overload strategic freight routes;</i></li> <li>2. <i>providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;</i></li> <li>3. <i>providing opportunities for travel demand management;</i></li> <li>4. <i>requiring integrated transport assessment for substantial developments; and</i></li> <li>5. <i>improving road user safety.</i></li> </ol>	<p>Plan Change 73 provides for a linkage to the Site and a future ODP will show how the Site will knit in to the existing arterial and local roading network and the possible future growth to the north and east of the Site.</p> <p>Goulds Road provides direct connection to the town centre where connections to the public bus services are possible.</p> <p>The proposed rezoning is consistent with, and will give effect to, the outcomes sought by this Policy.</p>
<p><b>6.3.5 Integration of land use and infrastructure</b>  <i>Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:</i></p> <ol style="list-style-type: none"> <li>1. <i>Identifying priority areas for development to enable reliable forward planning for infrastructure development and delivery;</i></li> <li>2. <i>Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation</i></li> </ol>	<p>The factors and outcomes sought in Policy 6.3.5 have formed the basis for identification of growth areas with Greater Christchurch as reflected in Map A and the setting of the infrastructure boundary.</p> <p>Consultation with Selwyn Utilities staff did not flag any major concerns with this proposal from a servicing perspective.</p> <p>The proposal gives effect to this Policy.</p>

<p><i>of transport and other infrastructure in order to:</i></p> <ol style="list-style-type: none"> <li><i>a. optimise the efficient and affordable provision of both the development and the infrastructure;</i></li> <li><i>b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;</i></li> <li><i>c. protect investment in existing and planned infrastructure; and</i></li> <li><i>d. ensure new development does not occur until provision for appropriate infrastructure is in place;</i></li> </ol> <p><i>3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;</i></p> <p><i>4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in <a href="#">Map A</a> (page 6-28); and</i></p> <p><i>5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.</i></p>	
<p><b>6.3.7 Residential location, yield and intensification</b></p> <ol style="list-style-type: none"> <li><i>1. In relation to residential development opportunities in Greater Christchurch:</i></li> <li><i>2. Subject to <a href="#">Policy 5.3.4</a>, residential greenfield priority area development shall occur in accordance with <a href="#">Map A</a>. These areas are sufficient for both growth and residential relocation through to 2028.</i></li> <li><i>3. Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres</i></li> </ol>	<p>See assessment for Policy 6.3.1.</p> <p>Greenfield areas identified on Map A were developed on the primary basis of anticipated demand created by the recovery and rebuilding process following the Canterbury earthquakes. While these were stated to apply through to 2028, recent analysis of population growth and take-up of land for new housing has shown that the growth requirements were underestimated and land availability overestimated.</p> <p>This has been addressed in the update to the Urban Development Strategy which is contained in the report “Our Space 2018-2018 – Greater Christchurch Settlement Pattern Update”. The Update provides for residential development</p>

<p><i>commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land.</i></p> <ol style="list-style-type: none"> <li>4. <i>Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):</i></li> <li>5. <i>10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;</i></li> <li>6. <i>15 household units per hectare in greenfield areas in Christchurch City;</i></li> <li>7. <i>Intensification development within Christchurch City to achieve an average of:</i></li> <li>8. <i>50 household units per hectare for intensification development within the Central City;</i></li> <li>9. <i>30 household units per hectare for intensification development elsewhere.</i></li> <li>10. <i>Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.</i></li> <li>11. <i>Housing affordability is to be addressed by providing sufficient intensification and greenfield priority area land to meet housing demand during the recovery period, enabling brownfield development and providing for a range of lot sizes, densities and appropriate development controls that support more intensive developments such as mixed use developments, apartments, townhouses and terraced housing.</i></li> </ol>	<p>out to the Projected Infrastructure Boundary identified in Map A contained in Chapter 6 of the CRPS. Even that update has not kept pace with recent housing and urban land demand.</p> <p>The objectives and policies of Chapter 6 RPS do not recognise that housing needs of Greater Christchurch have moved on from responding to the impacts of the earthquakes. In particular there is a demand for residential land for housing created primarily now by natural growth in the population, particularly for those people buying their first home or seeking to re-settle in Greater Christchurch generally. Planning instruments have not responded in a timely way to this demand in an efficient manner and there is evidence that that situation is causing the price of land and new housing to increase beyond historical levels.</p> <p>Planning for this demand can be by way of changes to, and review of, the RPS and District Plans or legitimately by way of Private Plan changes and submissions on the Proposed District Plan. Private initiatives provide opportunities for planning responses to provide timely planning interventions to help meet the changed circumstances driving demand for urban and housing.</p> <p>Private requests are generally a much faster and therefore more responsive process. The PSDP does not add any additional housing areas to those provided on Map A, so seriously 'underzones' for what is required to meet housing needs over the life of the SPD. The approach appears to be to rely on submissions to address the shortfall.</p> <p>The yield of about 12hh/ha satisfies the criteria of Policy 6.3.7.</p>
<p><b>CHAPTER 9- ECOSYSTEMS AND INDIGENOUS BIODIVERSITY</b>  <b>9.2 Objectives</b>  <b>9.2.1 Halting the decline of Canterbury's ecosystems and indigenous biodiversity</b>  The decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life supporting capacity and mauri safeguarded</p>	<p>There is no indigenous biodiversity of any particular value on the Site proposed to be rezoned notwithstanding the EIB overlay on the Site..</p>
<p><b>CHAPTER 11- NATURAL HAZARDS</b>  <b>1.2 Objectives</b></p>	<p>Parts of the Site (potential flood channels) are within the PSDP Plains Flood Management Area. All dwellings will have an appropriate floor level above the 200 year Average Return</p>

<p><b>11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards</b></p> <p>New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.</p>	<p>Interval (ARI) design flood level, as required by the SPRDP rules.</p> <p>A geotechnical assessment at subdivision (or before) will show if there are any issues with liquefaction and foundation stability. The Site is within a low geotechnical risk area as shown on the Ian McCahon map below (on the SDC website) – site outlined in red.</p> 
<p><b>CHAPTER 12- LANDSCAPE</b></p> <p><b>2.2 OBJECTIVES</b></p> <p><b>12.2.1 Identification and protection of outstanding natural features and landscapes</b></p> <p>Outstanding natural features and landscapes within the Canterbury region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development.</p> <p><b>12.2.2 Identification and management of other landscapes</b></p> <p>The identification and management of other important landscapes that are not outstanding natural landscapes. Other important landscapes may include:</p> <ol style="list-style-type: none"> <li>1. natural character</li> <li>2. amenity</li> <li>3. historic and cultural heritage</li> </ol>	<p>There are no outstanding natural landscapes or features or other amenity landscapes that could be impacted by development of the Site.</p>
<p><b>CHAPTER 15-</b></p> <p><b>SOILS 15.2</b></p> <p><b>OBJECTIVES 15.2.1 Maintenance of soil quality</b> Maintenance and improvement of the quality of Canterbury's soil to safeguard their mauri, their life supporting capacity, their health and their productive capacity.</p> <p><b>15.3 POLICIES</b></p> <p><b>15.3.1 Avoid remedy or mitigate soil degradation</b></p> <p>In relation to soil:</p> <ol style="list-style-type: none"> <li>1. to ensure that land-uses and land management practices avoid significant long-term adverse effects on soil quality, and to remedy or mitigate significant soil</li> </ol>	<p>This objective and its policies relate to the quality of soil and potential impacts on this quality by land management practices associated with activities such as intensive farming.</p> <p>It is not therefore relevant to the proposed rezoning for urban and residential purposes.</p> <p>The Site does not contain Class 1-3 soils.</p>

<p>degradation where it has occurred, or is occurring; and</p> <p>2. to promote land-use practices that maintain and improve soil quality.</p> <p><b>15.3.2 Avoid and remedy significant induced soil erosion</b></p> <p>To avoid significant new induced soil erosion resulting from the use of land and as far as practicable remedy or mitigate significant induced soil erosion where it has occurred. Particular focus is to be given to the desirability of maintaining vegetative cover on non-arable land.</p>	
<p><b>CHAPTER 17- CONTAMINATED LAND</b></p> <p><b>17.2 OBJECTIVES</b></p> <p><b>17.2.1 Protection from adverse effects of contaminated land</b></p> <p>Protection of people and the environment from both on-site and off-site adverse effects of contaminated land.</p> <p><b>7.3 POLICIES</b></p> <p><b>17.3.1 Identify potentially contaminated land</b></p> <p>To seek to identify all land in the region that was historically, or is presently, being used for an activity that has, or could have, resulted in the contamination of that land, and where appropriate, verify the existence and nature of contamination.</p> <p><b>17.3.2 Development of, or discharge from contaminated land</b></p> <p>In relation to actually or potentially contaminated land, where new subdivision, use or development is proposed on that land, or where there is a discharge of the contaminant from that land:</p> <p>1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and</p> <p>2. if it is found that the land is contaminated, except as provided for in Policy 17.3.3, the actual or potential adverse effects of that contamination, or discharges from the contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.</p>	<p>A Preliminary Site Investigation will be required at subdivision to identify previous HAIL activities on Site, and if any DSI is required.</p> <p>Any minor level of contamination can be simply managed and removed at the time of development.</p> <p>The proposal therefore satisfies this objective and policies.</p>



## Appendix 3: Assessment of Proposed Selwyn District Plan Objectives and Policies

### Dunns Crossing Road Re-zone Submission

Objective/Policy	Assessment
<b>Strategic Directions</b> <b>Compact and Sustainable Township Network</b> SD-UFD-O1 Urban growth is located only in or around existing townships and in a compact and sustainable form that aligns with its anticipated role in the Township Network, while responding to the community's needs, natural landforms, cultural values, and physical features.	<p>The Site is on the south western edge of Rolleston, and provides a compact form to the town and responds to the on-going demand for houses and building lots in Rolleston.</p> <p>Rolleston's role as the District centre will continue as it is planned to be several scales larger in size and function than Prebbleton and Lincoln.</p> <p>The proposal is consistent with the Objective.</p>
<b>Urban Growth and Development</b> SD-UFD-O2 There is sufficient feasible development capacity to meet anticipated demands for housing and business activities.	<p>PC 64 confirms that there is an imminent shortfall in suitable land for housing in Rolleston.</p> <p>The development will provide about 588 lots to add to Rolleston's housing stock.</p> <p>The proposal helps achieve the Objective.</p>
<b>Integration of Land Use and Infrastructure</b> SD-UFD-O3 Urban growth and development: <ol style="list-style-type: none"> <li>1. is well-integrated with the efficient provision, including the timing and funding, of infrastructure; and</li> <li>2. has the ability to manage or respond to the effects of climate change.</li> </ol>	<p>Servicing will be determined at subdivision stage (or before).</p> <p>This inland site is free of sea level rise and is remote from major river systems from a flooding perspective.</p> <p>The design of the development and its location with ready accessibility to the town centre and the public bus route will provide the basis for minimising effects of climate change.</p> <p>The proposal achieves the Objective.</p>
<b>Energy and Infrastructure</b> EI-O1 Important infrastructure is: <ol style="list-style-type: none"> <li>1. efficient, effective, and resilient, and</li> <li>2. provides and distributes essential and secure services as part of local, regional, or national networks, including in emergencies; and</li> <li>3. integrates with urban development and land uses throughout the district; and</li> <li>4. enables people and communities to provide for their wellbeing.</li> </ol>	<p><b>IMPORTANT INFRASTRUCTURE:</b>  <i>Those necessary facilities, services, and installations which are critical or of significance to either New Zealand, Canterbury, or Selwyn.</i></p> <p>The Site will be developed, in time, to full urban density serviced by Council reticulated services.</p> <p>This enables the Rolleston community to continue to provide for its well-being.</p>
<b>Transport</b>	To be assessed at subdivision stage or prior in an Integrated Traffic assessment.
<b>Contaminated land</b> CL-O1 Human health and the environment are not compromised by the use of contaminated land. CL-P1	A PSI at subdivision (or before) will confirm if there are areas of potential contamination across the Site.

<p>Require any proposal for subdivision, development, or use of contaminated land or potentially contaminated land to apply a best practice approach to investigate the risks, and either remediate the contamination or manage activities on contaminated land to protect people and the environment.</p> <p><b>CL-P2</b> Use and development of remediated contaminated land does not damage or destroy any containment works, unless comparable or better containment is provided.</p>	<p>This will ensure that human health and the environment are protected from harm.</p> <p>The proposal is consistent with the Policy.</p>
<p><b>Natural Hazards</b> <b>NH-O1</b> New subdivision, use, and development, other than new important infrastructure and land transport infrastructure:</p> <ol style="list-style-type: none"> <li>1. is avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</li> <li>2. in all other areas, is undertaken in a manner that ensures that the risks of natural hazards to people, property and infrastructure are appropriately mitigated.</li> </ol> <p><b>NH-O3</b> Methods to mitigate natural hazards do not create or exacerbate adverse effects on other people, property, infrastructure, or the environment.</p> <p><b>NH-O4</b> The effects of climate change, and its influence on sea levels and the frequency and severity of natural hazards, are recognised and provided for.</p> <p><b>NH-P1</b> Avoid new subdivision, use, or development of land in high hazard areas...</p> <p><b>NH-P2</b> Avoid the development or use of land, buildings or structures in high hazard areas for any important infrastructure or land transport infrastructure...</p> <p><b>NH-P3</b> Restrict new subdivision, use or development of land in areas outside high hazard areas but known to be vulnerable to a natural hazard, unless any potential risk of loss of life or damage to property is adequately mitigated.</p>	<p>The Site is mapped as part of the Plains Flood Management Area, but there are no areas of high flood hazard in the Site. Usual subdivision designs are to construct preferential flood flow paths through the Site based on the road network with detailed design at the subdivision stage.</p> <p>The risks of natural hazards to people, property and infrastructure are appropriately mitigated by compliance with PSDP rules about floor heights.</p> <p>Climate Change effects are unlikely at an inland site that is remote from the coast and major rivers.</p> <p>The proposal is consistent with the Policy.</p>
<p><b>Flood Hazards</b> <b>NH-P10</b> In areas within the Plains Flood Management Overlay that are not a high hazard area, provide for any new subdivision, use, and development (other than important infrastructure and land transport infrastructure) only where every new residential unit or principal building has an appropriate floor level above the 200 year Average Return Interval (ARI) design flood level.</p> <p><b>NH-P12</b> Manage earthworks undertaken in the Waimakariri Flood Management Overlay and the Plains Flood Management Overlay to ensure that they do not exacerbate flooding on any other property by</p>	<p>The development will adopt the floor level standard as a key mechanism to manage flood risks.</p> <p>The proposal is consistent with the Policy.</p>

displacing or diverting floodwater on surrounding land.	
<b>Geotechnical Hazards</b> <b>NH-P13</b> Provide for subdivision on flat land where the liquefaction risk has been appropriately identified and assessed, and can be adequately remedied or mitigated.	A geotechnical investigation can be supplied. The Site is within a low risk geotech area.
<b>Ecosystems and Indigenous biodiversity</b> <b>EIB-01</b> Indigenous biodiversity within the district is managed through the exercise of kaitiakitanga and stewardship,	There are no ecosystems or indigenous biodiversity mapped in the PSDP, nor evident on the Site despite the EIB Overlay.
<b>Natural Features and Landscapes</b> <b>NFL-01</b> The outstanding natural features and landscapes of Selwyn are protected from inappropriate subdivision, use, and development. <b>NFL-02</b> The values of the visual amenity landscapes of Selwyn are maintained and, where possible, enhanced.	There are no natural features or landscapes mapped in the PSDP, nor evident on the Site.
<b>Subdivision</b> <b>SUB-01</b> Subdivision design and layout maintains or enhances the amenity values of the zone. <b>SUB-02</b> Every site created by subdivision has the characteristics, infrastructure, and facilities appropriate for the intended use of the land. <b>SUB-03</b> Site sizes reflect the anticipated development outcomes of the zone. <b>SUB-P1</b> Avoid the creation of any site that cannot contain a residential unit as a permitted or controlled activity... <b>SUB-P2</b> Ensure that every site created by subdivision has safe and efficient access for motorists, pedestrians, and cyclists, consistent with that required for the intended use of the site. <b>SUB-P3</b> Other than infrastructure sites or reserve sites, ensure that every site created by subdivision on which a building may be erected has all of the following features... <b>SUB-P4</b> Provide for a variety of site sizes within a subdivision, while achieving an average net site size no smaller than that specified for the zone. <b>SUB-P6</b> Require the subdivision layout to respond to and follow natural and physical features such as the underlying landscape, topography, and established vegetation.	<p>The proposal is to create a high amenity residential area with amenity within streets, and in the reserve reflecting the amenity and landscape character of land to the east and north of the Site.</p> <p>A range of lots sizes are enabled to create visual variety, housing choice and different price points avoiding a standardised urban form and outlook.</p> <p>A design check will confirm all lots can be built on to PSDP standards.</p> <p>A DEV/ODP plan will provide for the needs for safe and efficient access for motorists, pedestrians, and cyclists and linkages to the town centre, schools and community facilities.</p> <p>The sites will be checked and will deliver the policy outcomes of SUB-P3.</p> <p>The proposal is consistent with the Policy.</p>

<b>SUB-P7</b> Manage the form of land to be taken for reserves, including having regard to the...	
<b>NOISE-O1</b> The health and wellbeing of people and communities and their amenity values are protected from significant levels of noise. <b>NOISE-O2</b> Important infrastructure which generates noise is protected from reverse sensitivity effects.	<p>The proposal is for a GRZ development which has no noise generating activities within the Site, nor close by.</p> <p>There is no important infrastructure nearby that requires protection.</p>
<b>NOISE-P3</b> Protect Christchurch International Airport....	N/A
<b>District Wide Matter: Urban Growth</b> <b>UG-O1</b> Urban growth is provided for in a strategic manner that: <ol style="list-style-type: none"> <li>1. Achieves attractive, pleasant, high quality, and resilient urban environments;</li> <li>2. Maintains and enhances the amenity values and character anticipated within each residential, kainga nohoanga, or business area;</li> <li>3. Recognises and protect identified Heritage Sites, Heritage Settings, and Notable Trees;</li> <li>4. Protects the health and well-being of water bodies, freshwater ecosystems, and receiving environments;</li> <li>5. Provides for the intensification and redevelopment of existing urban sites;</li> <li>6. Integrates with existing residential neighbourhoods, commercial centres, industrial hubs, inland ports, or knowledge areas;</li> <li>7. Is coordinated with available infrastructure and utilities, including land transport infrastructure; and</li> <li>8. Enables people and communities, now and future, to provide for their wellbeing, and their health and safety.</li> </ol>	<p>The development will be controlled by an Outline Development which will be based on core concepts to achieve attractive, pleasant, high quality, and resilient urban environments that maintain and enhance the amenity values and character anticipated.</p> <p>There are no on-site water bodies.</p> <p>The development will integrate into the existing built up area of Rolleston to the north and east.</p> <p>Good linkage with and integration with land transport infrastructure (Bus, walk, cycle) will be provided.</p> <p>The proposal will provide a future option to ensure that the Rolleston community can provide for its wellbeing, and their health and safety for housing choice, transport movement, and recreation needs.</p> <p>The proposal is consistent with the Policy.</p>
<b>UG-O2</b> Townships maintain a consolidated and compact urban form to support: <ol style="list-style-type: none"> <li>1. Accessible, sustainable and resilient residential neighbourhoods, commercial centres, industrial hubs, inland ports, or knowledge areas;</li> <li>2. The role and function of each urban area within the District's Township Network and the economic and social prosperity of the District's commercial centres; and</li> <li>3. The efficient servicing of townships and integration with existing and planned infrastructure.</li> </ol> <b>UG-O3</b> There is sufficient feasible housing and sufficient business development capacity within Greater Christchurch to ensure: <ol style="list-style-type: none"> <li>1. The housing bottom lines are met;</li> <li>2. A wide range of housing types, sizes, and densities are available to satisfy social and</li> </ol>	<p>The Site is on the south western boundary of Rolleston near to existing residential development (Faringdon). It ensures a consolidated and compact urban form.</p> <p>The development within itself, and in its linkages to existing and future urban areas, provides an accessible, sustainable and resilient residential neighbourhood that seamlessly knits in to the exiting township supporting its role in the district's Township Network.</p> <p>The proposed rezoning will enable Rolleston to better meet its role as the District Centre, including providing additional local residents to support local services and facilities. PC73 for land adjoining to the north proposed two local business centres. This rezoning proposal will provide additional catchment for those centres.</p>

<p>affordability needs and respond to demographic change; and</p> <p>3. Commercial and industrial growth is supported by a range of working environments and places to locate and operate businesses consistent with the District's Activity Centre Network.</p>	<p>Providing an additional 588 General Residential lots will contribute to ensuring that there is sufficient feasible housing capacity to meet the needs of the next immediate period (3-5 years). Provision for medium density housing in the development enables a wide range of housing types, sizes, and densities to be available to satisfy social and affordability needs and respond to demographic change.</p> <p>The proposal is consistent with the Policy.</p>
<p><b>Urban Growth</b></p> <p><b>UG-P1</b> Spatially identify new urban growth areas supported by a Development Plan.</p> <p><b>UG-P3</b> Avoid the zoning of land to establish any new urban areas or extensions to any township boundary in the Greater Christchurch area of the District outside the Urban Growth Overlay.</p> <p><b>Urban Form</b></p> <p><b>UG-P7</b> Any new urban areas shall deliver the following urban form and scale outcomes:</p> <ol style="list-style-type: none"> <li>1. Township boundaries maintain a consolidated and compact urban form;</li> <li>2. The form and scale of new urban areas support the settlements role and function within the District's Township Network;</li> <li>3. The natural features, physical forms, opportunities, and constraints that characterise the context of individual locations are identified and addressed to achieve appropriate land use and subdivision outcomes, including where these considerations are identified in any relevant Development Plans; and</li> <li>4. The extension of township boundaries along any strategic transport network is discouraged where there are more appropriate alternative locations available.</li> </ol>	<p>The Site is not within the Our Space Fig 16 identified FDAs.</p> <p>The proposal is consistent with Policy UG-P7 on all fronts. The rezoning will better enable Rolleston to achieve its role as the District Centre including by providing for additional local residents to support local services and facilities.</p>
<p><b>UG-P8</b> Avoid the following locations and areas when zoning land to extend township boundaries to establish new urban areas:</p> <ol style="list-style-type: none"> <li>1. Sites and Areas of Significance to Māori;</li> <li>2. Significant Natural Areas;</li> <li>3. Outstanding Natural Landscapes and Visual Amenity Landscapes; and</li> <li>4. High Hazard Areas.</li> </ol>	<p>None of the Matters in UG-P8 apply to the Site.</p>
<p><b>UG-P9</b> Recognise and provide for the finite nature of the versatile soil resource when zoning land to extend township boundaries to establish new urban areas.</p>	<p>The Site has no Class 1-3 soils ie no versatile soils.</p>
<p><b>UG-P10</b> Ensure the establishment of high-quality urban environments by requiring that new urban areas:</p>	<p>The proposal is consistent with UG-P10.</p>

<ol style="list-style-type: none"> <li>1. Maintain the amenity values and character anticipated within each township and the outcomes identified in any relevant Development Plan;</li> <li>2. Recognise and protect identified Heritage Sites, Heritage Settings, and Notable Trees; and</li> <li>3. Preserving the rural outlook that characterises the General Rural Zone through appropriate landscape mitigation, densities, or development controls at the interface between rural and urban environments.</li> </ol>	<p>The development respects and builds on the amenity values and character of Rolleston.</p>
<p><b>UG-P11</b> When zoning land to establish any new urban area or to extend any township boundary, avoid reverse sensitivity effects on:</p> <ol style="list-style-type: none"> <li>1. any adjoining rural, industrial, inland port, or knowledge zone; and</li> <li>2. on the safe, efficient and cost-effective operation of important infrastructure, land transport infrastructure, and the strategic transport network.</li> </ol>	<p>The proposal will give rise to no reverse sensitivity effects. It is not expected that the proposal will create issues on the safe, efficient and cost-effective operation of the land transport infrastructure, and the strategic transport network (an ITA can be supplied).</p>
<p><b>UG-P12</b> Ensure the zoning of land to extend township boundaries to establish new urban areas demonstrates how it will integrate with existing urban environments, optimise the efficient and cost-effective provision of infrastructure, and protect natural and physical resources, by:</p>	<p>The proposal is consistent with this policy.</p>
<p><b>Development Capacity</b>  <b>UG-P13 Residential growth – Greater Christchurch area</b>  Any new residential growth area within the Greater Christchurch area shall only occur where:</p> <ol style="list-style-type: none"> <li>1. Extensions assist in meeting the housing bottom lines (minimum housing targets) of 8,600 households over the medium-term period through to 2028.</li> <li>2. A HDCA and FDS identify a need for additional feasible development capacity for the township and the additional residential land supports the rebuild and recovery of Greater Christchurch;</li> <li>3. The land is subject to an Urban Growth Overlay and the area is either: <ol style="list-style-type: none"> <li>a. a 'greenfield priority area', or any subsequent urban growth areas or urban containment boundaries, in the CRPS where it is a residential activity; or</li> <li>b. identified in an adopted Rural Residential Strategy and in accordance with CRPS Policy 6.3.9 where it is a rural residential activity.</li> <li>c. The minimum net densities of 12hh/ha for residential activities or 1 to 2hh/ha for rural residential activities are met;</li> </ol> </li> <li>4. A diversity in housing types, sizes and densities is demonstrated to respond to the demographic changes and social and affordability needs identified in a HDCA, FDS or outcomes identified in any relevant Development Plan; and</li> </ol>	<p>The Site is not within an FDA identified in Our Space.</p> <p>The submission has an extensive discussion on Chapter 6 CRPS, on the issues around future development capacity, the status of the various District Council strategy documents, and Our Space which represents the Greater Christchurch Councils' goals (now out of step and out of date) for providing future development capacity.</p> <p>That discussion notes <i>the current CRPS is not consistent with the NPS-UDC or its replacement, the NPS-UD. It retains a 'hard and fast' urban/rural boundary line which predates both NPSs and there is no ability to rezone land outside the Map A greenfield priority or existing urban areas.</i></p> <p>The point is made that the <i>NPS-UD 2020 has immediate effect, so in the meantime, proposals (such as this submission) must interpret 'significant development capacity' in the context of the overall intent and purpose of the NPS-UD as articulated in the NPS-UD objectives and policies.</i></p> <p>An assessment of the proposal against the NPS-UD 2020 concludes that the rezoning proposal is a fundamental inconsistency with Map A of Chapter 6 but is consistent with the approach of the NPS-UD 2020 for significant development capacity, with or</p>

<p>5. An ODP is prepared that addresses the matters listed in UG-ODP Criteria and incorporated into this Plan before any subdivision proceeds.</p>	<p>without being added to the adjoining Plan Changes 64, 70 and 73.</p> <p>The proposed development is consistent with and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11 (traffic effects to be assessed in an ITA).</p> <p>The proposed rezoning will achieve a minimum 12 hh/ha and provide a greater diversity of housing choices, including more smaller more affordable medium density housing than existing housing available in Rolleston. An ODP/DEV will be supplied, which will meet the UG-ODP criteria.</p>
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## Appendix 4: Section 32 RMA Assessment for Proposed District Plan Submission

### Dunns Crossing

#### Introduction and RMA requirements

1. The submitters are lodging a submission on the Proposed Selwyn District Plan to change the zoning of the application site from General Rural Zone (Specific Control Area 1 Inner Plains) to General Residential (56.21 ha) Zone.
2. The submission has outlined the background to and reasons for the requested submission.
3. The amendments to the Proposed Plan are outlined in the submission. No adverse environmental effects are anticipated by the change of zoning, however the potential environmental effects of implementation of the submission have been described in the relevant sections of the submission.
4. Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management Act. Selwyn District Council has also required submitters for re-zoning submissions to prepare a section 32 assessment in support of the submission.
5. Section 32 states:

#### *Requirements for preparing and publishing evaluation reports*

*(1) An evaluation report required under this Act must—*

*(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*

*(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*

*(i) identifying other reasonably practicable options for achieving the objectives; and*

*(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*

*(iii) summarising the reasons for deciding on the provisions; and*

*(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

*(2) An assessment under subsection (1)(b)(ii) must—*

*(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*



(i) economic growth that are anticipated to be provided or reduced; and  
(ii) employment that are anticipated to be provided or reduced; and  
(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—
  - (i) are relevant to the objectives of the amending proposal; and
  - (ii) would remain if the amending proposal were to take effect.

5. The Guidance Note on section 32 analysis on the Quality Planning website makes the following statement:

*Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the effectiveness and efficiency of the option should be considered:*

- *Effectiveness - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.*
- *Efficiency - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).*

6. In this case it is the appropriateness of rezoning General Rural land to General Residential that needs to be examined.

### **Objective of the Submission to the Proposed District Plan**

6. The objective of the submission is to change the zoning of the application site in the Proposed District Plan from General Rural Inner Plains to General Residential Zone by adopting, as far as possible, proposed planning zones and subdivision, activity and development standards.
7. Accepting the submission will:
- a) Provide for short term additional housing and residential land choice in Rolleston at General Residential standards that achieve the target of 12 households/ha. Such densities will complement the nearby residential land without compromising the character or amenity of that land, acknowledging that the land adjoining to the north is zoned LLRZ but is subject to a Plan Change to re-zone as GRZ.
  - b) Provide for urban development that will square off the southwestern edge of the existing township in a manner that enables efficient use of existing and future

infrastructure and current land resources and that provides depth by straddling Dunns Crossing Road across from Plan Changes 64 and 70.

### **Environmental Outcomes – District Plan Objectives and Policies**

8. The Proposed Selwyn District Plan (PSDP) objectives give effect to the purpose of the Resource Management Act and the PSDP policies in turn give effect to the PSDP objectives. The objectives are the end goals or end states (including environmental outcomes) to be strived for and the policies are the broad strategies to achieve the objectives.<sup>1</sup>
9. The proposed residential rezoning has been assessed against the relevant District Plan objectives and policies. It concludes that the requested rezoning is entirely consistent with and meets the outcomes sought by the objectives and policies, but not for urban/township growth and new residential areas. The Site is not identified on the PSDP planning maps with a Future Growth Overlay; it is not identified within a FDA in Figure 16 of Our Space and is not within the Projected Infrastructure Boundary.
10. The most efficient use of the Site is for full urban development, given the high demand but lack of land for housing at Rolleston, and the Site's location within a logical urban growth path for Rolleston as shown in Figure 16 Our Space which has all FDAs in south Rolleston.

### **Identification of options**

11. In determining the most appropriate means to achieve the objectives of the submission, a number of alternative planning options are assessed below.
12. These options are:
  - a) Option 1: status quo/do nothing: Do not rezone the Site.
  - b) Option 2: submission to rezone the whole site for urban residential use.
  - c) Option 3: submission to rezone the whole site as Large Lot Residential (PSDP).
  - d) Option 4: resource consent: ad hoc land use and subdivision consent for subdivision through non-complying subdivision and land use consents for residential use.

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<sup>1</sup> See PSDP Part 1, HPW Plan Structure

<b>S32 Matter</b>	<b>Option 1: Do nothing: Rural Zone</b>	<b>Option 2: General Residential Zone (56 ha)</b>	<b>Option 3: Large lot Residential</b>	<b>Option 4: Consents</b>
Cost	<p>None for submitters.</p> <p>On-going costs for landowners with rural activities managing effects of adjoining residential land uses especially the immediately adjoining LRRZ zone to the north.</p>	<p>Time and money cost to submitter submission processes and technical reports.</p> <p>Different servicing costs for respective development densities.</p> <p>Development contributions for Council services</p> <p>Contributes some potential commuter traffic to Greater Christchurch from a portion of the anticipated appx. 588 additional households. (but site is very accessible to public transport services)</p>	<p>Time and money cost to submitter for submission processes and technical reports.</p> <p>Large lot densities are a less efficient use of the scarce resource of land so close to an existing, growing urban centre i.e. this is now a key urban growth path for Rolleston filling in to the logical southern township boundary.</p> <p>Additional consenting and servicing cost for any future relevant densities, if further zoning approved (development can be 'future proofed' for future urban densities).</p> <p>Contributes some traffic potential commuter traffic to Greater Christchurch from a portion of the households (but site is readily accessible to public transport services)</p>	<p>Time and money cost to Applicant to seek one-off noncomplying land use and subdivision consents. Consents unlikely to be approved as exceed the permitted Rural zone dwelling density standards &amp; policy requires higher densities to be 'avoided'.</p> <p>Community cost and uncertainty in responding to ad hoc applications and not seeing the full scale of possible development at any time.</p>
<b>S32 Matter</b>	<b>Option 1: Do nothing: Rural Zone</b>	<b>Option 2: General Residential Zone (49 ha)</b>	<b>Option 3: Large lot Residential</b>	<b>Option 4: Consents</b>
Benefit	<p>Ongoing low output rural production on the Site.</p> <p>Retains existing rural character and amenity</p>	<p>Additional housing stock with greater choice in typology than currently available, contributing to the growth of Rolleston. Contributes additional supply of housing to market where there is</p>	<p>Lesser volume of housing stock contributing to the growth of Rolleston.</p> <p>A ODP/DEV plan will provide an overall plan of integrated</p>	<p>No rezoning required.</p> <p>Benefit to individuals that succeed (but successful applications unlikely)</p>

		<p>very strong demand and no remaining supply.</p> <p>Adds competition to the land/housing market in Rolleston.</p> <p>An ODP/DEV at subdivision will provide overall plan of integrated land development.</p> <p>Implements NPS-UD.</p> <p>Provides more households to support township services/amenities and facilities.</p>	<p>land development for the site.</p> <p>Can be future proofed for urban rezoning.</p> <p>Provides more households to support township services/amenities and facilities.</p>	
<b>S32 Matter</b>	<b>Option 1: Do nothing: Rural Zone</b>	<b>Option 2: General Residential Zone (49 ha)</b>	<b>Option 3: Large lot Residential</b>	<b>Option 4: Consents</b>
Efficiency/ Effectiveness	<p>Application site remains low productivity rural lifestyle land bounded by urban land use.</p> <p>Rolleston's housing needs may not be met.</p> <p>Consistent with Rolleston Structure Plan 2010 and Our Space (which are not consistent with the NPS-UD).</p>	<p>Utility services can be most efficiently provided by the Council.</p> <p>Effective as it utilises low productivity rural land in a location undergoing rapid urbanisation.</p> <p>Effective in providing for the needs and well-being of landowners according to respective aspirations.</p> <p>Comprehensively provides for extension of the township as planned for.</p> <p>Effective in meeting Rolleston housing needs in an appropriate location, and implements the NPS-UD</p>	<p>Utility services can be most efficiently provided by the Council.</p> <p>Less effective and efficient than Option 2 because cannot achieve the same residential yield to meet Rolleston's housing needs, and if 'future proofed' for future urban development, the yield will be less because there will be more 'interim' larger lots containing dwellings approved under the Large Lot Residential zoning.</p>	<p>Least effective and efficient as outcomes from consent processes are uncertain, and potentially un-coordinated and lack proper planned integration with the township utilities.</p>

## **Risks of Acting or Not Acting**

13. The Council's strategic intentions for Rolleston are contained in the Rolleston Structure Plan 2009. However, the staging and implementation proposals in this document is now out of date, and does not reflect the reality of a current under-supply of housing at Rolleston in the face of continuing very strong demand.
14. Zoning under the Proposed District Plan has to be robust enough to last the statutory life of the Plan (10 years), and the NPS-UD 2020 also requires that at the end of 10 years the Council is assured that there will be a sufficient supply of appropriately zoned land beyond that point. The risk of not acting in 2020 to re-zone sufficient urban zoned land, and to provide security of land supply over that timeframe, is that, Rolleston will continue to experience the present day issues of uncatered for demand, undersupply of serviced land and a lurch in land and house prices.
15. The risk is that if necessary decisions are not taken today then the sustainable growth and development of Rolleston over the foreseeable planning period is uncertain. Not re-zoning sufficient land that can support appropriate housing typologies to meet the needs of a range of household needs is not meeting the purpose of the Act, nor meeting the Council's obligations to sustainably manage the natural and physical resources of the Selwyn District for present and future generations, or the requirements of the NPS-UD 2020.
16. There is a risk that the GRZ land supply is controlled by a limited number of large developers, who will act out of self-interest in either land-banking or staging release of land to maximise returns. Allowing smaller proposals than those identified in Plan Change 64, 70 and 73 will provide a supply of serviceable land, and provide competition to the housing/land supply market. That is giving effect to an element of the NPS-UD 2020.
17. The submitters will commission a number of reports in support of subdivision: soil contamination, geotechnical, and servicing reports to inform and shape the development proposal.
18. There is no risk that a decision will be made in an absence of expert advice and appropriate technical solutions for servicing and design and there is the subdivision and detailed design stage to be passed.
19. All these inputs to the proposal mean there is little, if any, uncertain or missing information in relation to this proposal.
20. It is therefore considered that there are no significant risks of acting to adopt the Plan Change or accept the submission.

## Summary of s32 evaluation

S32 Evaluation	Option 1: Do nothing: Rural Zone	Option 2: General Residential Zone (49 ha)	Option 3: Large lot Residential	Option 4: Consents
Objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act	±	+	±	×
Whether the provisions in the proposal are the most appropriate way to achieve the objectives	×	+	±	×
Benefits	+	+	+	×
Costs	×	++	++	±
Risks	+	×	×	++

×: does not achieve the matter, negative effect

+: does achieve the matter; positive effect

++: significant effect

±: neutral in relation to the matter

## Overall Assessment

21. Based on the above assessment, it is concluded that the submission to re-zone the Site from Rural Zone to General Residential is the most appropriate method for achieving the objectives of the proposal, than the other alternatives also considered above.
22. Option 2 is consistent with a range of District Plan policies notwithstanding that it does not sit square with the implementation staging signalled in Rolleston Structure Plan 2009 (which does not take account of the new NPS-UD 2020 and the significant shortage of housing land at Rolleston in the face of very strong demand).
23. Option 2 to re-zone the site for GRZ is the most appropriate given:
  - a) The proposals adopt a Proposed District Plan zone, and development and activity standards. This ensures continuity of District Plan anticipated environmental outcomes and urban amenity for Rolleston;

- b) Will be consistent with and give effect to the relevant proposed District Plan objectives and policies;
  - c) It is a logical extension to the developed and developing residential land adjoining and near to the Site while achieving a compact, efficient urban form that removes pressure on isolated rural land elsewhere in the General Rural Inner Plains Zone;
  - d) There is no additional cost to the Council in re-zoning the land in this proposal as there is capacity in the public utilities and the existing road network, including planned upgrades, will accommodate the traffic effects of about 675 households;
  - e) ODP/DEV plan will provide certainty at subdivision of the final form and disposition of the re-zoned area including its proposals for reserves, roading, future linkages for pedestrian and vehicular traffic.
24. The proposal is considered to be appropriate to achieve the long term sustainable growth and development of Rolleston.
  25. The economic, social and environmental benefits of the proposal outweigh the potential costs.
  26. The overall efficiency and effectiveness of the proposal is high, in comparison the alternative options which are low (Options One and Four) or low to moderate (Option Three).
  27. The proposal is considered to be the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.