



Submission on Greater Christchurch Settlement Update – Our Space 2018-2048

Elliss Darusette Ltd

November 2018

Greater Christchurch Partnership

Submitter Details

Name: Elliss Darusette

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

Hearings:

I wish speak at the hearings.

Preferred location: Selwyn District.

Contact number: C/- Aston Consultants Ltd. Contact details as above.

Background:

Ellis Darusette Ltd owns 606 Selwyn Road, Rolleston ('the Site'), a 1.207 ha block which immediately adjoins the Geddes South Rolleston Special Housing Area ('SHA') known as Chelsea Green (See Figure 1 below). Chelsea Green and the Site are both currently zoned Rural Inner Plains but are within the Projected Infrastructure Boundary on Map A of the Canterbury Regional Policy Statement (CRPS) and within the Rolleston Structure Plan long term urban boundary (see Rolleston Structure Plan map below). The exclusion of the Site from the SHA is an anomaly and in effect creates a small 'tooth like' intrusion of rural land into the otherwise logical SHA boundary, and resulting in the Site having urban development on two sides.

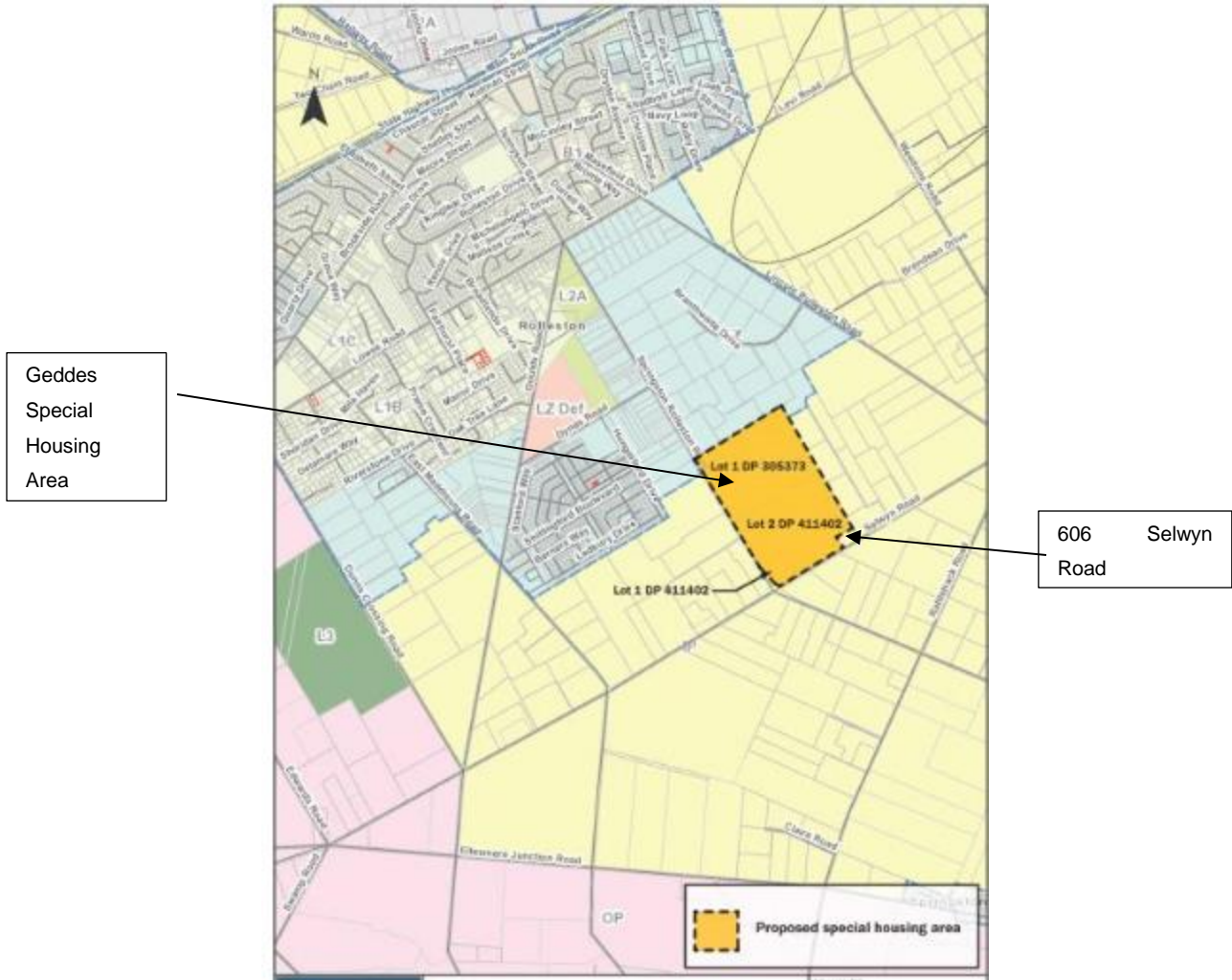


Figure 1 – Location

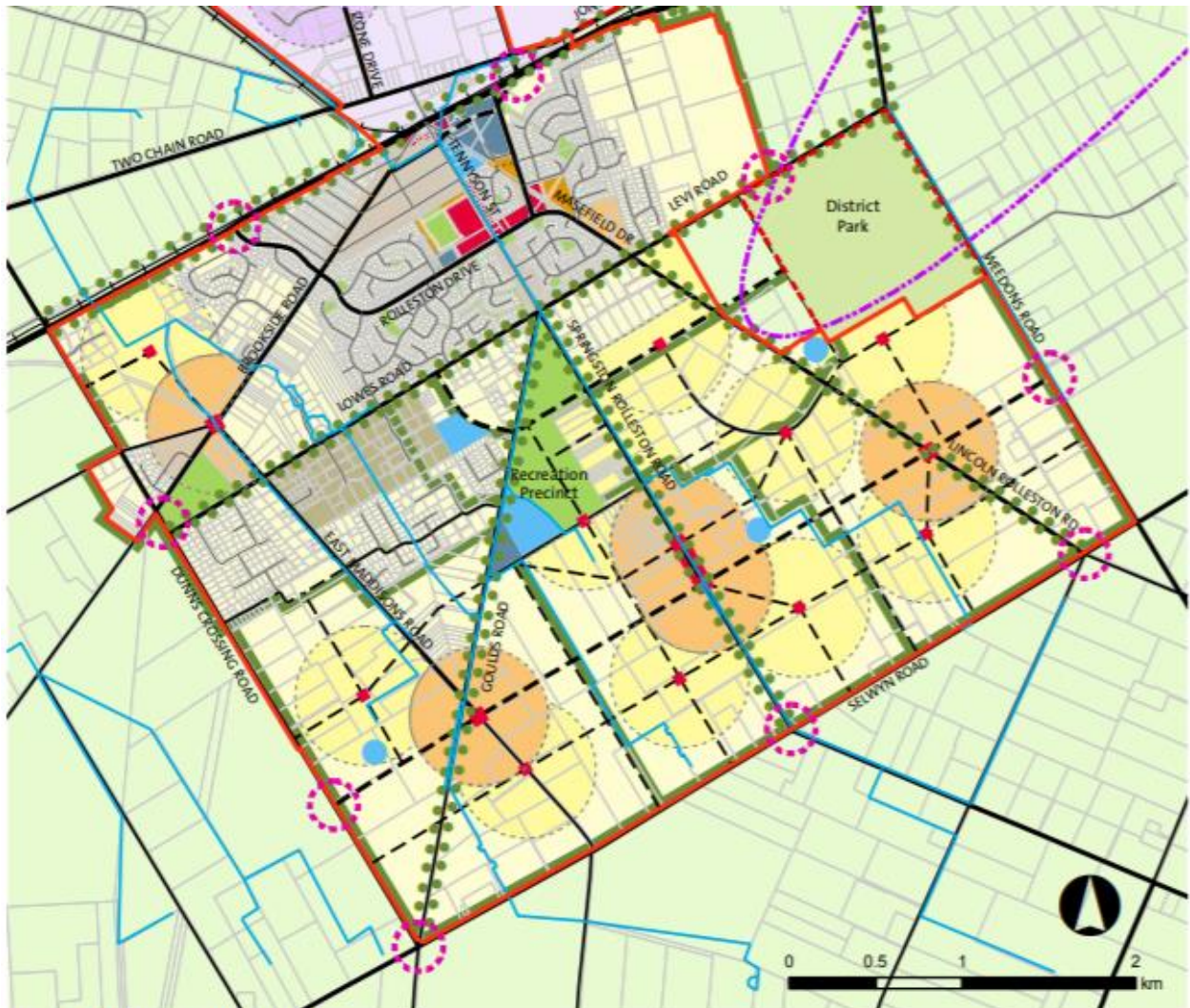


Figure 5.2: Rolleston Structure Plan



Resource consents RC165454, 165455, 165508 and 165509 were granted consent on 22 December 2016 under the Housing Accords and Special Housing Areas Act 2013 (“HASHAA”) to subdivide the Geddes South Rolleston HASHAA, a 72.1973ha site, into 743 residential lots and construct up to 888 dwellings on those lots; develop a small neighbourhood centre and create associated open space areas. The proposed development is known as Chelsea Green (see approved subdivision plan

attached as **Appendix A**).

In considering the Chelsea Green site for inclusion under the HASHAA, Ellis Darussettes' land was excluded. Ellis Darussette was not approached by the Geddes family (then owners of the Chelsea Green SHA) or Selwyn District Council regarding possible inclusion of the Site within the SHA.

Development of the Chelsea Green subdivision is currently underway with Stages 10, 11 and 12 being the first phases of development, with the respective stages developing in a northward direction from Selwyn Road. The inclusion of 606 Selwyn Road will be compatible with the timing of the relevant stages. It is also sound planning practice to ensure that urban boundary extensions to accommodate new greenfield areas have logical, defensible boundaries.

The Submitter lodged a submission on the Selwyn District Plan Review seeking that:

- Selwyn District Council make a formal request and/or submission on the Greater Christchurch Settlement Review seeking that 606 Selwyn Road and the Rolleston Special Housing Areas be included in the GC Settlement Review and on Map A of the Canterbury Regional Policy Statement (Chapter 6) as a Priority Greenfield Area – Residential;
- That 606 Selwyn Road and the Rolleston Special Housing Areas be rezoned Living Z in the Selwyn District Plan Review.

Figure 16 - Greater Christchurch Settlement Pattern Update: 2018 – 2048

Figure 16 of the Greater Christchurch Settlement Pattern Update: 2018 – 2048 (GCSU) identifies the South Rolleston SHAs in the legend and on Fig 16 as 'Special Housing Areas'. SHAs are subject to streamlined legislation so are not subject to the CRPS objectives and policies for Greenfield Priority Areas. It appears from the scale of Fig 16 that 606 Selwyn Road is included with the SHA, whereas this is not the case. Fig 16 should be amended to correct this anomaly, by amending Fig 16 and the legend for 'Greenfield Priority Areas – Residential' to include the Site.

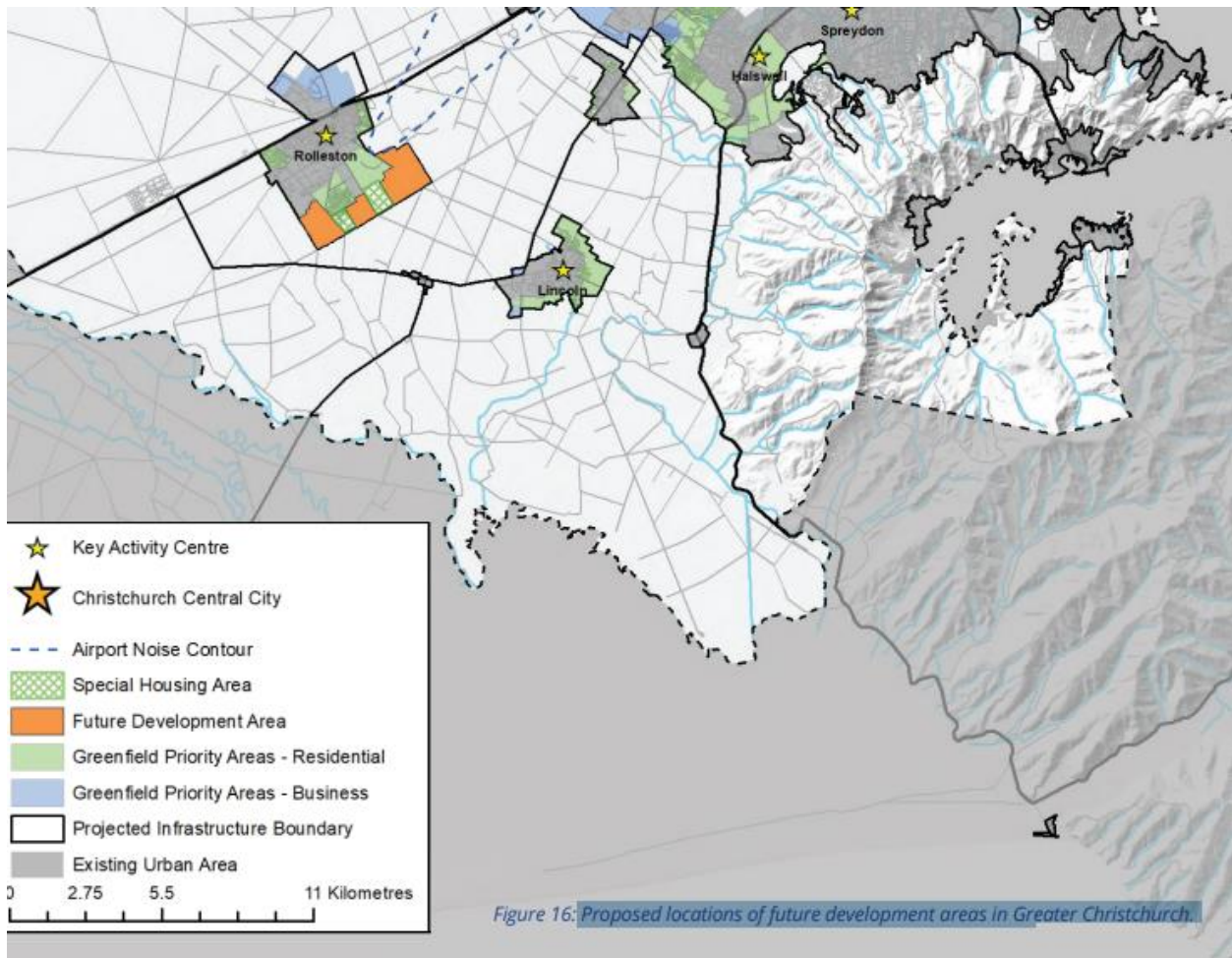


Figure 2 – Proposed locations of future development area in Greater Christchurch

Future Development Areas – Rolleston

Land within the Projected Infrastructure at South Rolleston is shown as Future Development Area. Table 3 of Our Space indicates that there is sufficiency of housing development capacity in Selwyn for the medium term (2018-2028). Schedule of Future Work No. 8 (page 34) is to prepare an amendment to the Canterbury Regional Policy Statement in 2019 that addresses any need for additional housing development capacity over the medium term. This means that because **Our Space** considers that the Selwyn Future Development Area will only required post 2028, it will not be identified as Greenfield Priority Area in the proposed 2019 change to the CRPS.

Our Space acknowledges that the housing capacity assessments which provide the basis for the housing targets are uncertain and the commercial feasibility testing and modelling in particular is problematic, with a wide range of results depending on the adopted assumptions and inputs. It notes that given the wide range of reported feasibility, capacity in both Selwyn and Waimakariri


may not be sufficient over the medium as well as the long term (page 13). The housing targets required under the National Policy Statement – Urban Development Capacity (NPS – UDC) are minimums not maximums. Given the high level of uncertainties, it is appropriate that additional Priority Greenfield areas are provided in both Selwyn as well as Waimakariri for the medium term. The 2019 CRPS change should provide for both.

Minor developments outside and minor changes to Rural/Urban Boundary

An unfortunate consequence of a fixed uncontested rural/urban boundary line in the CRPS and an associated objective and policy framework which requires ‘avoidance’ of urban activities outside that line, is there is in effect, no flexibility to respond to minor anomalies, or small scale meritorious boundary changes which are not of regional significance. Suggest policy wording is included in the Relief Sought below to address this issue.

Relief Sought:

Additions are shown in bold and underlined and deletions as strike through.

1. Amend Fig 16: Proposed locations of future development areas in Greater Christchurch by as follows:-
 - Amend legend for Greenfield Priority Areas – Residential to:-
 **& 606 Selwyn Road, legally described as Pt RS 5192** - Greenfield Priority Areas – Residential
 - Change status of all or part of the Rolleston Future Development Areas to Greenfield Priority Areas – Residential, including 606 Selwyn Road, legal described as Pt RS 5192

2. **6.2 Schedule of future work**
Amend 8 (page 34) as follows:-

Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:-

- address any need for additional housing development capacity over the short and medium term including at Rolleston including by amending Map A to be consistent with the other relief sought in this submission (including 1. above and 3. below); and

- provide flexibility to accommodate meritorious proposals for urban development and zoning and to facilitate a responsive planning approach by amending and adding to the objectives and policies as follows (insertions in bold and underlined):-

Add new Policy 6.3.1A as below:-

Policy 6.3.1 A

(a) Enable urban development or zoning outside the Greenfield Priority, Special Housing Areas and Existing Urban Areas shown on Map A provided the following conditions are met:-

(i) Any additional land is contiguous with a Greenfield Priority Area, Special Housing area, or Existing Urban Area; and

(ii) Any additional land will integrate with the provision of infrastructure; and

(iii) Any additional land is a logical addition to the urban area and will contribute to a consolidated urban form; and

(iv) The beneficial planning outcomes for the urban development or extension outweigh any disbenefits arising from increasing the land available for urban development; and

(v) All of the criteria in Policy 6.3.11 (5)(a) to (g) inclusive are met.

Explanation:

This policy confirms the requirement for urban development to be contained within Greenfield Priority, Special Housing and Existing Urban Areas but provides some flexibility to accommodate meritorious proposals and to facilitate a responsive planning approach given the uncertainties associated with the housing and business land capacity assessments which have informed Map A, and the primary drivers and influencers of urban development in Greater Christchurch.

6.2.1 Recovery framework

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

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS **or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;**

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS **or which has minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;**

6.3.7 Residential location, yield and intensification

In relation to residential development opportunities in Greater Christchurch:

7. Subject to Policy 5.3.4, residential greenfield priority area development shall occur **generally** in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.
3. Specify in **Our Space** that Fig 16 be included in District Plans rather than the Canterbury Regional Policy, thus facilitating the ability for private plan requests for changes to the same, with appropriate criteria for assessment being included in the CRPS and/or District Plans; or as a less preferred alternative, other methods to retain flexibility and 'future proofing' to respond to meritorious housing and business development proposals which give effect to the NPS-UDC but are not recognized or provided for in **Our Space** and supporting documents.
4. Consider other amendments to the CRPS and other documents and other actions which are appropriate to facilitate a responsive planning approach to urban growth management for Greater Christchurch.
5. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitters' land and potentially other meritorious rural/urban boundary changes, and associated policy wording. Do not use streamlined processes for implementation of the overall **Our Space** strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.
6. Such other consequential, additional or other amendments to Chapter 6 of the CRPS and other documents, and any other actions, to be consistent with and give effect to the intent

of this submission including amendment to the Selwyn District Plan to rezone the Site (606 Selwyn Road) and the South Rolleston Special Housing Areas Living Z.

Reasons for Relief Sought:-

1. For the reasons set out above under and under the responses to the Submission Form questions below.
2. The housing and business development capacity targets, urban form outcomes, and Schedule of Future Work measures (including change to the CRPS) contained in **Our Space** will have a profound and defining effect on the Greater Christchurch settlement pattern for the next 30 years. There will be significant flow on effects for the local, regional and potentially national economies. There is an acknowledged high level of uncertainty with the housing and business development capacity targets; and the adopted approach is aspirational and untested with its focus being redevelopment and intensification of existing urban areas, underpinned by an as yet unfunded “*vision for transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle*”.¹ Despite all of this, there is no s32 assessment accompanying **Our Space**.
3. The amendments sought will enable the owners of 606 Selwyn Road to use the Site in the most appropriate, effective and efficient way which will achieve the purpose of the Resource Management Act 1991 (the Act).
4. **Our Space** as notified proposes an urban growth management approach, in particular as it affects 606 Selwyn Road, which is inconsistent with and does not give effect to the Act, including Part 2 and Section 32, and other relevant statutory and non statutory matters.
5. The **Our Space** development capacity targets are uncertain and likely to be inaccurate and are based on a flawed methodology.
6. **Our Space** considers a responsive planning approach is necessary but does not facilitate this, including the recommended further work and implementation, whereas the relief sought in this submission will facilitate this.
7. **Our Space** as notified is contrary to and does not give effect to the National Policy Statement – Urban Development Capacity (NPS – UDC) in particular Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points.

¹ Open Space p 19

8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by **Our Space** is unlikely to facilitate the urban form sought by **Our Space** including for the following reasons:-
- Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a very negative effect on housing affordability;
 - A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than “land bank” (because there is excessive capital gain due to scarcity of land supply);
 - Containment and higher land values does not facilitate intensification;
 - If the Central City and the Key Activity Centres are attractive the market will locate there by people’s choice. Generally carrots are better than sticks to achieve desired planning outcomes.
 - A contestable urban/rural boundary is not ‘laissez-faire’ and ad hoc and will not result in uncontained urban sprawl. The proposed amendments to Our Space and other planning documents require strategic planning including with respect to infrastructure, and an evidence base in support of any amendments to the boundary;
 - A policy of both “up and out” that ensures there are a range of development opportunities and housing choices is appropriate.

Housing Growth:

Question 1:

Our Space highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi.

Do you agree with this approach and why?

Response:

Agree with identifying additional greenfield land at south Rolleston as shown on Fig 16. Some if not all of the Rolleston Future Development Area, including 606 Selwyn Road should be identified on Fig 16 and on Map of the CRPS as Greenfield Priority – Residential now, not after 2028. The exclusion of 606 Selwyn Road from the adjoining Special Housing Area is an anomaly which has created a small ‘tooth like’ intrusion of rural land into the otherwise logical SHA boundary. 606

should be identified as Greenfield Priority Area now, and/or other amendments to the relevant planning documents made to enable its development for urban residential purposes.

See also comments above.

Question 2:

Our Space adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri.

Do you agree with this approach and why?

Response:

No comment.

Question 3:

Our Space proposes to develop an action plan to increase the supply of social and affordable housing across Greater Christchurch and investigate with housing providers the different models to make it easier for people to buy their own home.

What elements should be included in this action plan?

Response:

No comment.

Business Growth

Question 4:

Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their flexibility and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri.

Do you agree with this approach and why? What further measures would support such development?

Response:

No comment.

Question 5:

The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified suitable capacity for new industrial businesses.

Do you agree or disagree this is sufficient and in the right location and why?

Response:

No comment.

Growth needs

Question 6:

The proposals in **Our Space** are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy, including through business sector trends and impacts from technological change.

Do you agree or disagree with this evidence base and why?

Response:

No – see comments above under ‘Rolleston Future Development Areas’.

Transport and other infrastructure

Question 7:

Our Space promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and in intention to deliver rapid transit along the northern and south-west transport corridors.

Do you agree or disagree with this approach and why?

Response:

No response.

Question 8:

Our Space aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities.

Do you agree or disagree with this approach and why? What more could be done to integrate infrastructure planning?

Response:

No response.

Other

What other points do you wish to make to inform the final **Our Space 2018-2048 Greater Christchurch Settlement Update?**

Response:

No further comments other than as noted above.

Appendices

Appendix A: Chelsea Green approved subdivision plan

Appendix A

Chelsea Green approved subdivision plan



Application for Subdivision Consent

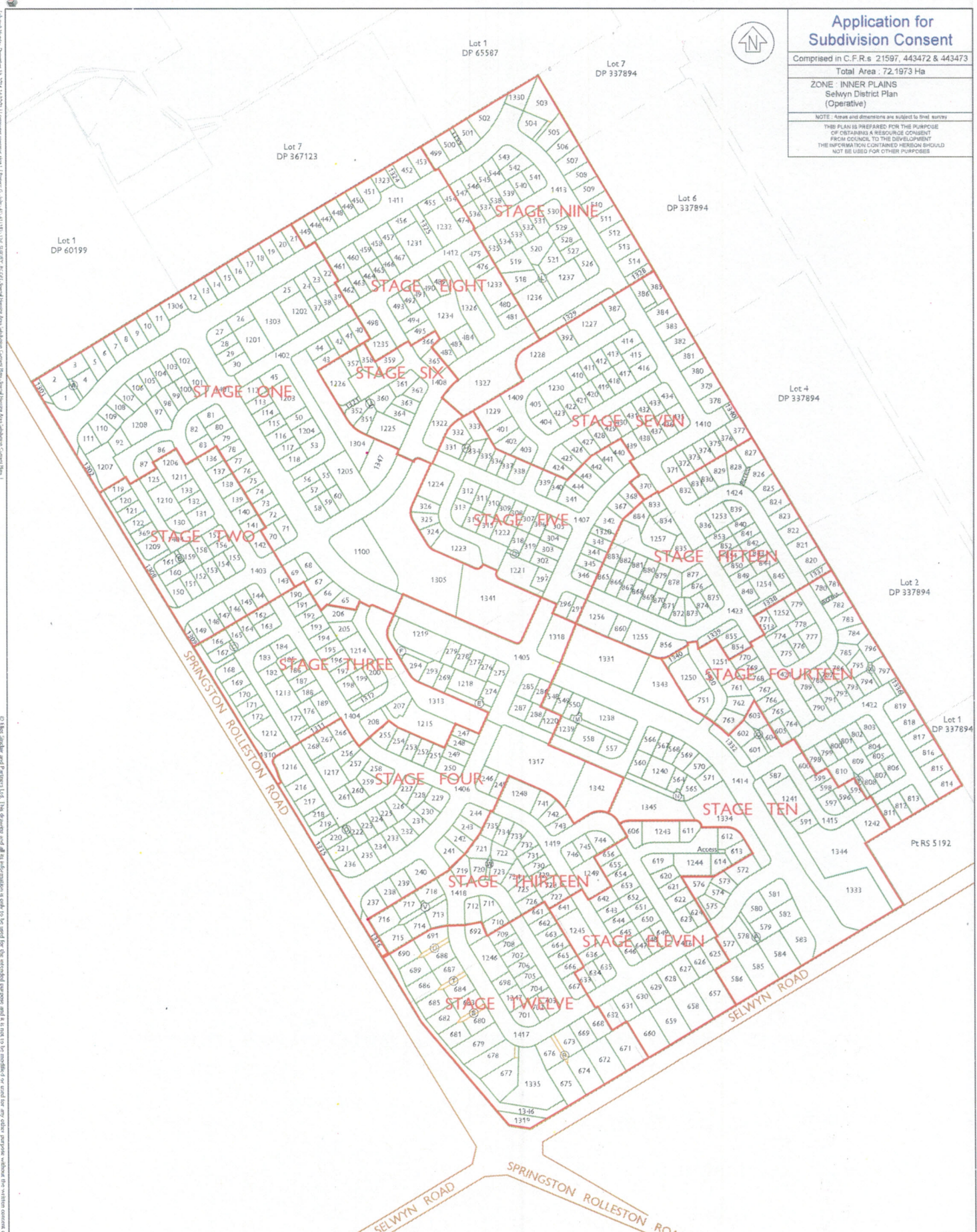
Comprised in C.F.R.s 21597, 443472 & 443473

Total Area: 72.1973 Ha

ZONE: INNER PLAINS
Selwyn District Plan
(Operative)

NOTE: Areas and dimensions are subject to final survey

THIS PLAN IS PREPARED FOR THE PURPOSE OF OBTAINING A RESOURCE CONSENT FROM COUNCIL TO THE DEVELOPMENT OF THE INFORMATION CONTAINED HEREIN SHOULD NOT BE USED FOR OTHER PURPOSES



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FINAL

no.	amendment	initial	date	designed	Jade McFarlane	surveyed	origin of levels	Projection NZGD 2000	Scale: 1:2000 (A1) 1:4000 (A3) Date: 31/7/2016	Drawing Set 411183 C1	Sheet 02
				manager	Mark Allan	stuv date	B82	Circuit Mt Pleasant 2000			
				drawn	Bob Greening		Stations: Steel Pins in Conc Jumper Road, Rolleston RL 55.934 (LINZ Dec 2013)				
				checked			datum Lyttelton 1937				

Chelsea Green Special Housing Area
Overall Staging Plan of Subdivision of Lot 1 DP 305373 and Lots 1 and 2 DP 411402
Springston Rolleston Road and Selwyn Road, Rolleston
for D.L.Geddes and B.M.Geddes and J.G.I.Cooke

Eliot Sinclair
surveyors | engineers | planners