



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

Sharon Jones

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Greater Christchurch Partnership

Submitter Details

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Hearings:

We wish to speak at the hearings.

Preferred location: Selwyn District



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

Background and Site

The Submitter ('the Submitter') owns an existing 4 ha property at 274 Lincoln Rolleston Road ('the Site'), legally described as Lot 2 DP 67190 BLK III. The Site is opposite the Branthwaite Drive residential subdivision, currently under development (see location plan below).



Fig.1 Location Plan

-  Submitters Land – Sharon Jones
-  Neighbouring land

The Site includes an existing dwelling and horse arena. The Submitter proposes to relocate to another rural property more suitably located for horse related activities, as the Site is now next to the Rolleston urban boundary and its rural amenity character has been significantly diminished due to surrounding residential subdivision and urban development at Rolleston which is proceeding at pace – and which is visible from the property, along with other urban elements including urban street lights. The adjoining roads are much busier than prior to recent urban development and not safe for horses.

The Site (and an adjoining 4 ha lot adjoining to the north, and the Purdon block (with frontage to Levi Road and extending behind the Site), referred to hereafter to as ‘the Neighbouring Land’) is within the Christchurch International Airport Noise contour as shown on the Rolleston Structure Plan below.

For this reason, it retains its current Rural Inner Plains zoning despite its proximity to the Rolleston urban area. The Rolleston Structure Plan shows a proposed '100 ha District Park' for the balance of the land within the 50 dBA contour south of Levi Road and west of Weedons Ross Road large block to the east, extending to Weedons Road (zoned Rural Inner Plains).

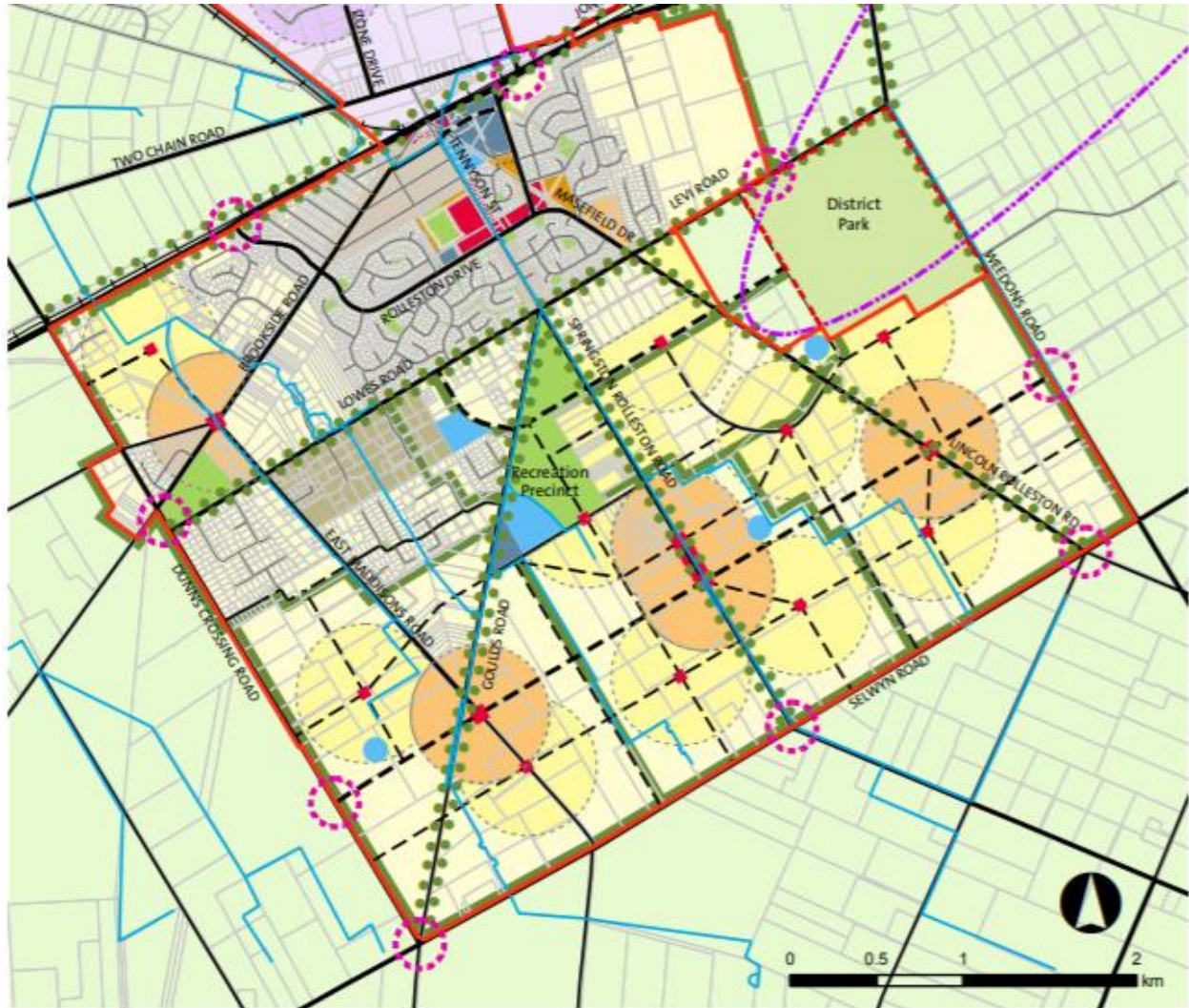


Figure 5.2: Rolleston Structure Plan



Possible district-scaled uses noted in the Structure Plan¹ for the District Plan include:

- *community gardens*
- *equestrian*
- *rowing*
- *cycling (mountain biking or road riding)*
- *local energy generation*
- *ecological areas*
- *cemetery/ crematorium*

It is envisaged that this park would be a district-wide facility that caters for recreational/community activities that may not be in more urban open spaces such as the 'Rolleston Recreation Precinct'. To date the park remains undeveloped is leased for farming purposes.

The Site and Neighbouring Land as noted above is located outside the Canterbury Regional Policy Statement (CRPS) Projected Long Term Infrastructure Boundary for Rolleston shown on Map A – the boundary otherwise extends further west to Weedons Ross Road but excludes this area because it is within the 50 dBA noise contour. For the same reason it is outside the Rolleston Future Development Area shown on Fig 16 of **Our Space**.

Amendments to Airport Noise Contours

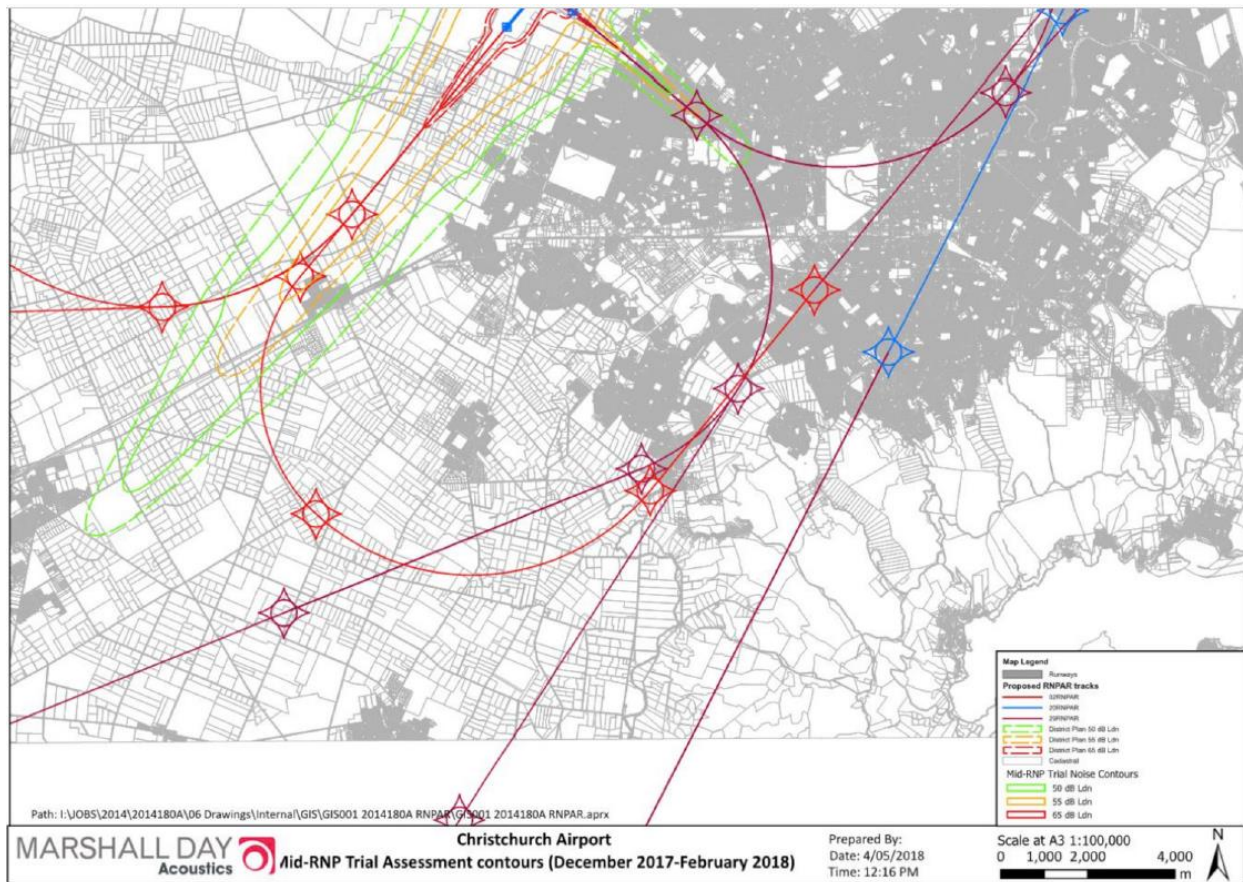
Christchurch International Airport (CIAL) are currently trialling alternative flight paths which will result in the southern extent of the flight path contracting as shown on the plan below – see copy of Interim Report attached as **Appendix A**. The interim report notes that the alternative flight paths have multiple benefits including fuel saving, reduced travel time and less noise impact on residential areas – *“The initial findings of the trial confirm aircraft are flying at a higher altitude over the city and concentrated populous areas, which results in reduced audible noise. There are also fewer flights over the suburbs of Wigram, Hornby, Prebbleton and Rolleston, and the trial flight paths avoid direct overflight of Templeton and West Melton settlements.”*²

The report does note that non PBN approach flights may still be used in fine weather, for air traffic control reasons for training purposes (PBN is a global air navigation standard, being introduced in accordance with international guidance and New Zealand government policy)

¹ Rolleston Structure Plan Section 7

² PBN Flight Paths Trial 2017-2018: Interim Report p
Aston Consultants Resource Management & Planning

The above work indicates that amendments to the CIAL airport noise contours are highly likely in the short term. **Our Space** has a 30 year timeframe (till 2048) so clearly needs to be updated to recognise the above imminent changes to the airport noise contours. There will no longer be any planning constraints to the Submitter's land and Neighbouring Land being included in the intended urban development area for Rolleston (currently shown as Future Development Area on **Our Space** Fig 16.). Inclusion of this land will consolidate the Rolleston urban form, creating a continuous and logical eastern boundary line along the length of Weedons Ross Road south of Levi Road to Selwyn Road.



Future Development Area – Rolleston

The Submitter supports identification of Future Development Area ('FDA') at Rolleston in **Our Space**, but with the inclusion of the Submitter's land and the Neighbouring Land. However, she considers the FDA, as amended to include the additional land as above, should be identified as Priority Greenfield Residential now, and rezoned Living Z to enable residential development to proceed.

Suitability of Land for Development

The Site and Neighbouring Land is adjoining and can be readily serviced from the existing Living Z areas, in particular the Branthwaite Drive subdivision on the opposite side of Springston Rolleston Road. There are no natural hazard issues which would preclude rezoning. The Site is not subject to liquefaction or other natural hazard risks such as flooding or ponding. The Site is a logical location for further urban development at Rolleston, especially given its relative proximity to the town centre.

Housing Development Capacity Assessments

Our Space acknowledges that its housing capacity work is uncertain, in particular assessment of the commercial feasibility of development, and that work is required to improve the modelling tools used. It recognizes that given the range of reported feasibility, capacity may not be sufficient to meet demand over the medium term in Waimakariri and Selwyn. Notwithstanding no provision is made for further capacity in the medium term anywhere in Selwyn, and only at Rolleston in the long term. **Our Space** also recognizes that a responsive planning approach is required given the many uncertainties associated with the primary drivers and influencers of urban development in Greater Christchurch.

The consequences of an 'undersupply' of housing are more significant than the consequences of oversupply i.e. land scarcity which generally leads to higher land prices and greater incentive to land bank and achieve 'easier' return on capital (at no risk) by capitalizing on increasing land values rather than by undertaking development.

Relief Sought:

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

1. Amend **Our Space** Fig 16: Proposed locations of future development areas in Greater Christchurch as follows:-
 - Identify Submitter's land and Neighbouring Land south of Levi Road and west of Weedons Ross Road, Rolleston as shown on Fig 1 Location Plan above as Greenfield Priority Residential and include with the Rolleston Projected Infrastructure Boundary;
 - Change the status of Rolleston Future Development Area to Greenfield Priority Areas – Residential

2. **Our Space** 6.2 Schedule of future work

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 adding an additional policy as follows:-

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.

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 **Our Space's** proposed responsive planning approach to urban growth management for Greater Christchurch³.
5. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitters' land and which provide flexibility to provide for meritorious zoning and urban development, including associated policy wording. Do not use streamlined processes for implementation of the overall **Our Space** strategy and approach as notified 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 directing consequential amendment to the Selwyn District Plan to zone the Submitter's land and the Neighbouring Land 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 very significant flow on effects for the local, regional and potentially national economies. There is no s32 assessment accompanying **Our Space** despite its defining role in 'dictating' the urban growth approach for Greater Christchurch for the next 30 years.
3. The amendments sought will enable the owners of the Site and the Neighbouring Land to use their land in the most appropriate, effective and efficient way which will achieve the purpose of the Resource Management Act 1991 (the Act).

³ Open Space, 6.1 Responsive Planning
Aston Consultants Resource Management & Planning

4. **Our Space** as notified proposes an urban growth management approach, in particular as it affects the Site and the Neighbouring Land, 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 the proposed implementation methods will not facilitate this, whereas the relief sought in this submission will.
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 but not limited to Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points.
8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by **Our Space** is unlikely to facilitate the urban form outcomes 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:

The Submitter's land and Neighbouring Land should be included in the Rolleston Future Development Area shown in Fig 16, but the Rolleston Future Development Area should be identified as Greenfield Priority Area and zoned Living Z now. See above for further background and reasons.

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:

See comments above re Capacity Assessment.

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 comment, other than it is noted that Rolleston will be connected by rapid transit under the **Our Space** proposals. However, no business case has been established for these proposals to date and they are highly uncertain. Further greenfield development at Rolleston should not be contingent on such facilities being in place first. The 4 laning of SH1 and the Southern Motorway extension will increase the ready accessibility to Christchurch City. Rolleston also has a significant and growing local employment area at Izone and the inland port.

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 comment, other than it is noted that there are no infrastructure constraints affecting the Submitter's land and the Neighbouring Land.

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: Amendments to Airport Noise Contours – Interim Report

Appendix A
Amendments to Airport Noise Contours – Interim Report



Christchurch PBN Flight Paths Trial

Interim Report

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Christchurch PBN Flight Paths Trial

Interim Report

PBN trial partners have prepared the following summary outlining progress of the PBN flight paths trial. A full report is to be issued on completion of the 12 month trial at the end of 2018. Airways New Zealand, the Board of Airline Representatives New Zealand (BARNZ), Christchurch Airport and New Southern Sky (NSS) approved this interim review and recommendations of the PBN flight paths trial.

Interim Review of 2017-2018 Christchurch PBN Flight Paths Trial

On 9 November 2017 Airways New Zealand, BARNZ, Christchurch Airport and NSS began a trial of Performance Based Navigation (PBN) flight paths in Christchurch. PBN is a global air navigation standard, being introduced in accordance with international guidance and New Zealand government policy. The 12-month flight paths trial is for arrivals to Christchurch only and is part of NSS, a 10-year programme led by NZ Civil Aviation Authority that is introducing major changes to New Zealand's aviation system in order to make air travel smarter, quicker, safer and more sustainable.

Christchurch PBN Approach Flight Paths

The PBN approach paths selected for the trial were the product of consultation between Airways New Zealand, BARNZ, Christchurch Airport and NSS. The philosophy adopted when selecting any flight path is to achieve a level of consensus by balancing the technical and operational needs of the trial, with an aim to moderate the overall noise effects on communities. The initial findings of the trial confirm aircraft are flying at a higher altitude over the city and concentrated populous areas, which results in reduced audible noise. There are also fewer flights over the suburbs of Wigram, Hornby, Prebbleton and Rolleston, and the trial flight paths avoid direct overflight of Templeton and West Melton settlements. The trial continues to receive valuable feedback from communities and individuals, and the four trial partners will continue to assess these as the trial progresses.

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Participating Aircraft

Most domestic and trans-Tasman jet aircraft are capable of flying the trial approaches and, later in 2018, some propeller aircraft will also become capable. However it is anticipated that many of these aircraft will still fly a non-PBN trial approach in fine weather (including north-westerly conditions using Runway 29), or for training, or for air traffic control reasons.

Flight Path Trial

The trial enables the collection of data (such as noise monitoring, number of flights) and community feedback, and helps to achieve the best balance of safety, airspace management and environmental benefits - such as noise reduction for communities, fuel and carbon emission savings.

Operational Data

For the period 9 November 2017 to 9 May 2018, Christchurch PBN trial flight paths were utilised by 2,607 aircraft. These aircraft flew 19,100 fewer kilometers, when compared to the shortest alternative instrument approach, and provided a number of additional benefits.

Christchurch Runway	Total trial flights 09 Nov 17-09 May 18	Maximum trial flights/day	Maximum trial traffic %/day
02	2108	28	30%
20	240	7 ¹	7%
29	259	31	31%

¹Trial flightpaths were not provided 'Straight-in' as existing approaches are already very efficient. Hence there is a low % of trial flightpath usage relating to Runway 20 - because the majority of arrival flights to Christchurch are inbound from the north (i.e. straight in for Runway 20).

Calculated benefits for the first six months:

Distance saved	19,100 km
Flight time reduction	1,500 minutes
Fuel saving	57,000 kgs
CO ₂ emissions	182,000 kgs
Passengers	379,000 ¹

¹Number of passengers who received reduced flight times and other benefits from PBN vertically guided approaches.

Noise Data

The mid-trial calculation of noise contours (included in figure 4) identified that noise generated during the first six months of trial fits within the District Plan compliance contours. In addition to the calculated noise contours, noise measurement data on aircraft noise levels was gathered from six noise measurement terminals installed under the trial flight paths. In general, noise levels measured during the trial are comparable with pre-trial noise levels. Noise experts are completing a detailed analysis of the data for inclusion in the final trial report.

Community Feedback

Feedback from the community was actively sought during the first six months of the trial, through announcements in the news media as well as via a dedicated website (www.christchurchflightpathstrial.co.nz) which featured information about the trial and provided a feedback form.

In total, 118 flight path feedback messages were received from the community, though some were found not to be PBN related. This leaves us with 76 complaints from 46 separate complainants, as well as 15 neutral/undecided and 18 positive responses at the six month point. Refer to Figure 2 for a graphic indication of geographical responses.

All enquiries were responded to by Christchurch Airport, with specific and individualised information provided by the partners. This feedback has been incorporated into the interim recommendations.

Interim Recommendations

The following interim recommendations have been made by the trial partners as a result of the 2017-2018 Christchurch PBN flight paths trial interim review:

1. Continue the one-year trial of PBN flight paths for arrivals to Christchurch Airport as planned, because a range of benefits is being achieved, and valuable data and feedback is being gathered.
2. Restrict the use of sensitive PBN flight paths prior to 9am on weekends from 14 July 2018. This is a direct response to community feedback and is expected to provide a material reduction in the noise impact for some residents.
3. Design an additional PBN flight path to approach runway 02 from the northwest (east of West Melton), as an alternative to the current PBN flight path. This would address residential noise concerns and increase pilot participation.
 - a. Trialing a new flight path may be achievable from 8 November 2018.
 - b. Noise sharing across these two flight paths should be considered as a future option.

These recommendations have been considered and agreed to by the four trial partners

Information about the Christchurch flight paths trial will continue to be made available on this website (www.christchurchflightpathstrial.co.nz), and a full report will be prepared and released following completion of the trial on 8 November 2018.

Figure 1: Christchurch PBN Trial Flightpaths:



Figure 2: Christchurch PBN Trial Flightpaths with indicative geographical responses (green positive, red negative):

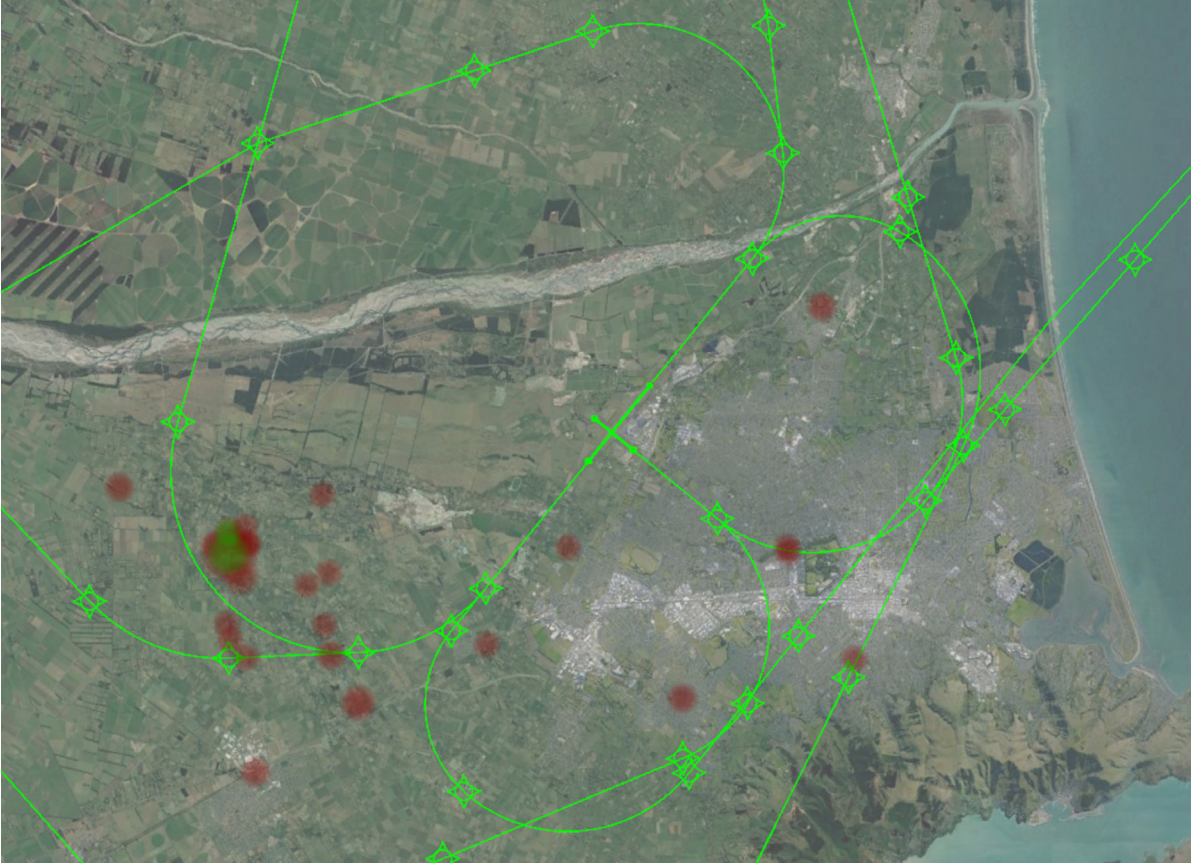


Figure 3: Christchurch PBN Trial Flightpaths – Recommended New Flightpath (red):

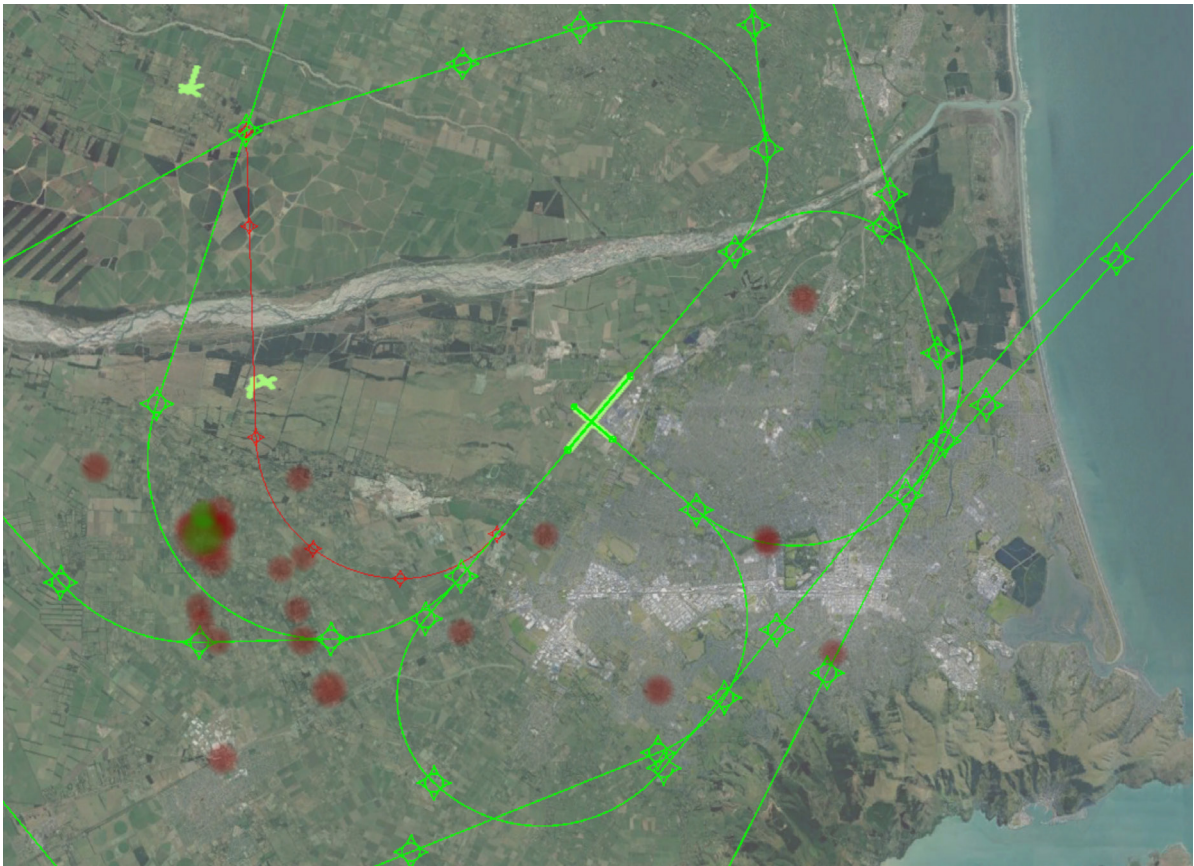
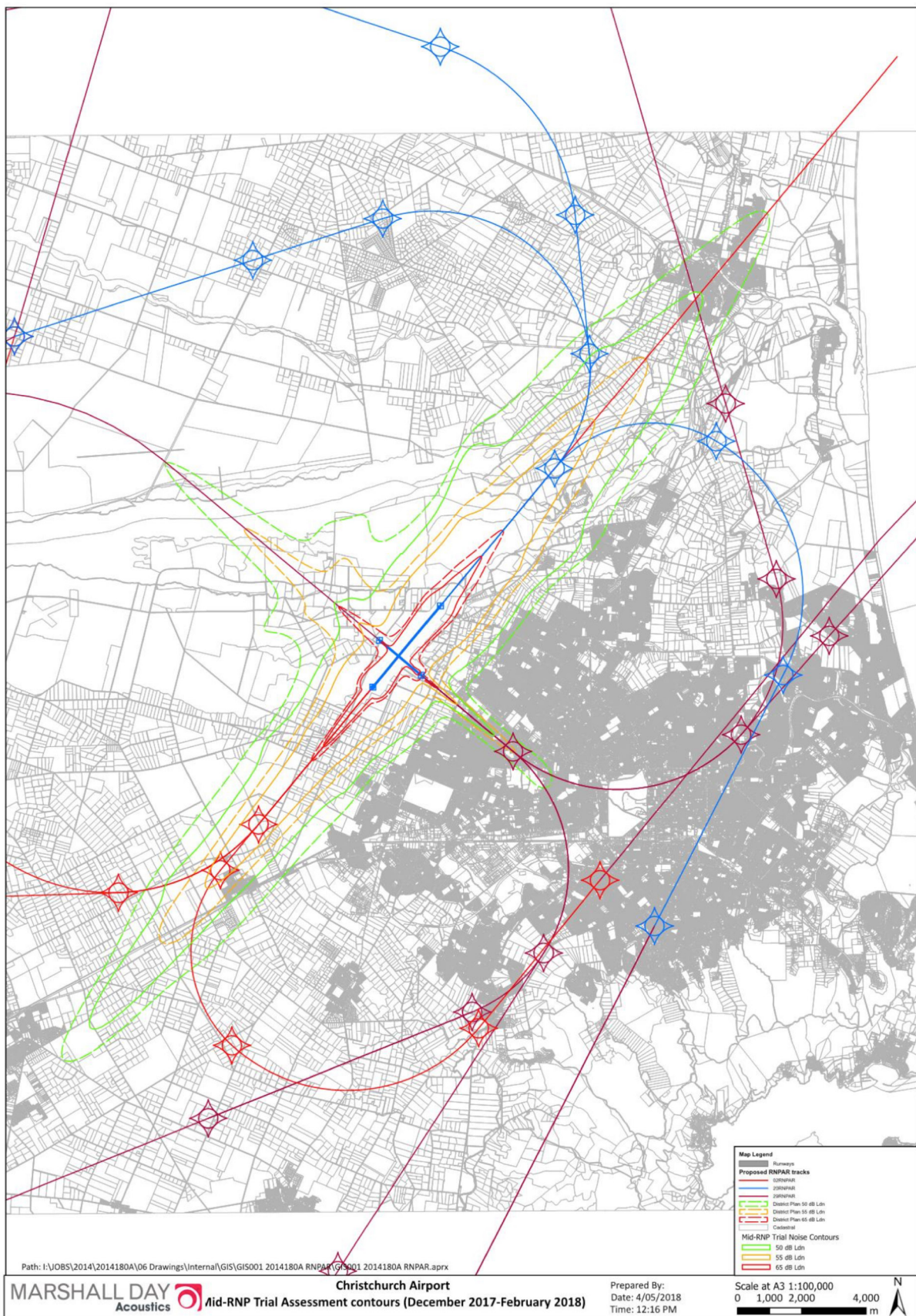


Figure 4: Christchurch PBN Trial Flightpaths – showing calculated noise contours in comparison with the District Plan Compliance Contours



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