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

Foddercube Products Ltd

November 2018

Greater Christchurch Partnership

Submitter Details

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Hearings:

I wish speak at the hearings.
Preferred location: Christchurch City
Contact number: C/- Aston Consultants Ltd. Contact details as above.

Background:

Foddercube Products Ltd ('Foddercube') owns 374 Springs Road, legally described as Lot 1 DP 53489 (5.2611 ha) and Lot 2 DP 49632 (7.6308 ha). There is only one other rural property (8 ha in area, owned by Kovan Ltd) separating the Foddercube land from Industrial Heavy zoned land to the north which adjoins the southern boundary of the Southern Motorway – see aerial photo below. The Kovan Ltd property is legally described as Lots 1 and 2 DP 82095.

The above two properties ('the Site') are located on the corner of Marshs and Springs Road on the boundary between Christchurch City and Selwyn District. The Southern Motorway extension is located approximately 500m to the north. The Foddercube land contains the Texture Plants 'niche' garden centre which provides quality native, exotic and evergreen trees and shrubs, and focusses on plants with foliage, form and structure. Texture Plants also grows turf on the site. The Kovan land is used for grazing.

The Site is zoned Rural/Urban Fringe and adjoins but is outside the Greenfield Priority Areas – Business as shown on Canterbury Regional Policy Statement (CRPS) Map A and **Our Space** Fig 16 – see zoning map below.



Fig 1: Location plan

Foddercube submitted on the Christchurch Replacement District Plan seeking rezoning of its land and the adjoining 8 ha to the north to Industrial Park Zone, a total area of 20 ha. Its preference now is for Industrial General or Industrial Heavy zoning, consistent with the zoning of adjoining land. This would consolidate the south Hornby industrial area, contained by Marshs Road to the south and Springs Road to the east. This is one of several cases where rezoning could not proceed, regardless of the merits because of Commissioners' finding that to give effect to the CRPS, 'higher order document', they were not entitled to zone for urban purposes land beyond

the existing urban area identified on Map A.

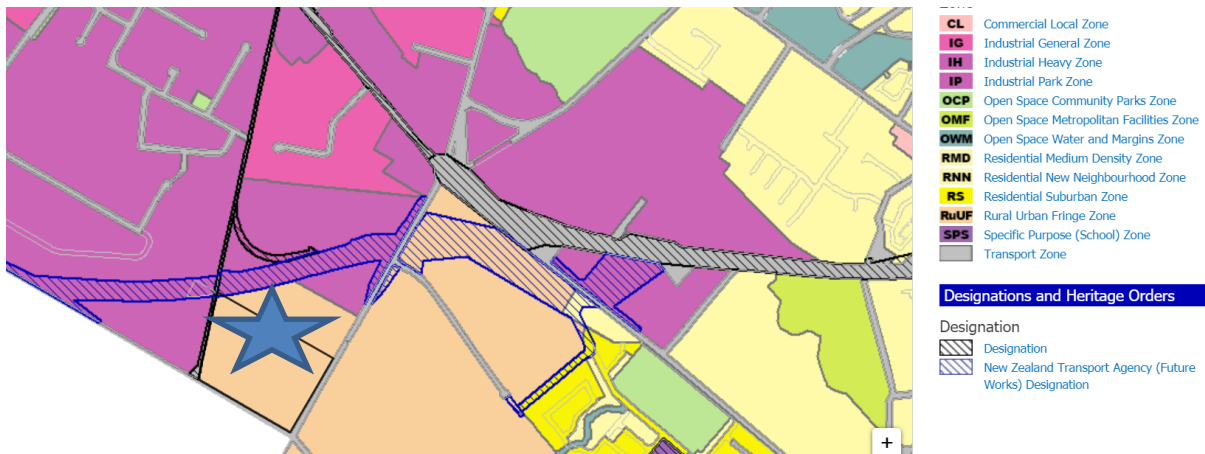


Fig 2: District Plan zoning map – Foddercube and Kovan sites marked with star

The **Our Space** Settlement Update provides the much needed opportunity to finally address these anomalous and meritorious urban boundary cases and enable the necessary changes to Map A to be made, and/or to provide some flexibility within the **Our Space** and the CRPS policy framework to achieve the same.

Merits of Rezoning

Experts for the Council and Foddercube agreed that there were no wastewater and water servicing constraints to rezoning and that the rezoning would achieve a consolidation of the south Hornby industrial area. ¹

Traffic modelling was undertaken which established that some parts of the road network in the area are operating at or near capacity, specifically the Halswell Junction Road/Springs Road and Marshs/Springs Road intersections. The modelling took into account the Southern Motorway Extension proposal, currently under construction. Changes predicted in road network operation over a 10 year period (2016-2026) as a result of the rezoning are marginal to negligible (see **Appendix A** for details). The modelling assumed 20 ha of Industrial Park zoning, whereas the Submitter now proposes Industrial Heavy zoning. The traffic generation rates are less for these alternative industrial zones, and substantially so (by 75%) for Industry Heavy zoning. Also noted, is

¹ O'Brien Rebuttal Evidence dated 24 September 2015 [para 6.4], Stevenson Rebuttal Evidence dated 24 September 2015 [para 7.4] – see <http://www.chchplan.ihp.govt.nz/hearing/chapter-15-commercial-part-and-chapter-16-industrial-part-stage-2/>

that Selwyn District Council Long Term Plan 2018-2028 includes upgrading the Springs/Marshs Rd intersection in 2020/21.

The proposed rezoning will not result in any adverse effects which would preclude rezoning.

Industrial Development Capacity

It is acknowledged that there is a large area of existing industrial zoning at south Hornby. It is understood that a considerable amount is in the hands of a small number of landowners. The addition of a further 20 ha to the industrial land supply will have no adverse effects in terms of 'oversupply' and is entirely consistent with the intent of the **Our Space** and Canterbury Regional Policy Statement urban growth management approach – namely to provide certainty as to where development will take place to enable planning for and development of infrastructure required for projected urban growth; to protect key strategic infrastructure such as strategic transport networks; and to ensure development is appropriately located in terms of potential environmental effects. There is a benefit in enabling the delivery of land for industrial development which is in a different ownership to the major south Hornby industrial landowners. The latter are able to effectively control the rate at which industrial land is supplied to the market and so maintain higher land values.

Developments outside and changes to Rural/Urban Boundary

An unfortunate consequence of a fixed rural/urban boundary line in the Canterbury Regional Policy Statement (CRPS) and on **Our Space** Fig 16 and an associated objective and policy framework which requires 'avoidance' of urban activities outside that line (CRPS Objective 6.2.1 and Policy 6.3.1), is there is in effect, no flexibility to respond to development proposals, anomalies, or meritorious boundary changes which do not offend the overall **Our Space** and CRPS urban growth management approach. The approach is intended to provide certainty as to where development will take place to enable planning for and development of infrastructure required for projected urban growth; to protect key strategic infrastructure such as strategic transport networks; and to ensure development is appropriately located in terms of potential environmental effects. Suggested 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:-

Change status of 374 Springs Road, Prebbleton legally described as Lot 1 DP 53489 (5.2611 ha) and Lot 2 DP 49632 (7.6308 ha) and the Kovan Ltd land adjoining to the north legally described as Lots 1 and 2 DP 82095 to Greenfield Priority – Business

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:-

- amend/delete Map A to be consistent with the 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 with 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 **and zoning** 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 have minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach**
3. Specify in **Our Space** that Fig 16 be included in District Plans rather than the Canterbury Regional Policy Statement, 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 streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitter's land and adjoining Kovan land and

potentially other meritorious rural/urban boundary changes, and associated policy wording. The rezoning has already been subject to rigorous 'testing' through the Christchurch Replacement District Plan process and its suitability for rezoning has already been established. 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.

5. Such other consequential, additional or other amendments to Chapter 6 of the RPS and other documents, and any other actions, to be consistent with and give effect to the intent of this submission, including directing amendment to the Christchurch City Plan to rezone the Site (374 Springs Road and immediately adjoining Kovan Ltd 8 ha of land to the north) Industrial Park or other industrial zoning as appropriate (as identified on Fig 2 above).

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 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 374 Springs Road and adjoining land 8 ha to the north owned by Kovan Ltd 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 374 Springs Road the adjoining 8 ha to the north owned by Kovan Ltd 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** industrial development capacity targets are uncertain and likely to be inaccurate and based on a flawed methodology.

6. **Our Space** considers a responsive planning approach to the management of the urban growth within Greater Christchurch is necessary but does not facilitate or enable this, whereas the relief sought in this submission does.
7. **Our Space** as notified is contrary to and does not give effect to the National Policy Statement – Urban Development Capacity (NPS – UDC).
8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by **Our Space** is likely to result in adverse social and economic effects, including for the following reasons:-
 - Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a negative effect on land affordability;
 - A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than “land bank” (because there is excessive capital gain due to scarcity of land supply);
 - A contestable urban/rural boundary is not ‘laissez-faire’ and ad hoc and will not result in uncontained urban sprawl. The 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.

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:

No comment

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 - see comments above in particular under 'Industrial Land Capacity'.

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 in particular under 'Industrial Land Capacity'.

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.

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 to note there are no infrastructure constraints to the rezoning requested in this submission.

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: Traffic effects of rezoning

Appendix A: Traffic Modelling – Impacts of rezoning Foddercube and Kovan land for industrial purposes ¹

The following traffic generation is based on the following estimate for the proposed 20Ha Industrial Park development:

- AM Peak Hour: 422 vehicles per hour (350 arrivals / 72 departures); and
- PM Peak hour: 437 vehicles per hour (92 arrivals / 345 departures).

If alternative industrial zonings were applied the traffic generation estimates would reduce as follows:-

	% reduction AM peak	% reduction PM peak
Industrial General	12	18
Industrial Heavy	75	75

Period	Approach	Change in Delay	Interpretation of Effect
2026 AM Peak	Springs Road approach to Halswell Junction Road.	124 seconds in Base model reducing to 115 seconds with Development (-9 seconds).	Negligible effect on operation.
	Halswell Junction Road west approach to Springs Road	40 seconds in Base model increasing to 56 seconds with Development (+16 seconds)	Level of Service E is acceptable for peak period traffic operation.
	Marshs Road North West approach to Springs Road	43 seconds in Base model increasing to 48 seconds with Development (+5 seconds).	Small change in delay and remains LoS D.
	Marshs Road South East approach to Springs Road	81 seconds in Base model increasing to 89 seconds with Development (+ 8 seconds).	Small change in delay affecting relatively few vehicles.
2026 PM Peak	Springs Road approach to Halswell Junction Road.	34 seconds in Base model increasing to 42 seconds with Development (+8 seconds).	Acceptable change in delay and remains LoS D.
	Halswell Junction Road east approach to Springs Road	70 seconds in Base model increasing to 72 seconds with Development (+2 seconds).	On the verge of LoS F without the development and will experience a small additional delay.
	Marshs Road North West approach to Springs Road	53 seconds in Base model increasing to 55 with Development (+2 seconds).	Small change in delay and remains LoS E.
	Marshs Road South East approach to Springs Road	54 seconds in Base model remaining at 54 seconds with Development.	No change in operation predicted.

NB: The site access intersections can be priority controlled from Marshs Road and Springs Road.

¹ Information supplied by Novo Group Ltd