

Draft Greater Christchurch Spatial Plan

**Officers' Report on Submissions of the draft Spatial
Plan**

04 October 2023

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Glossary of acronyms and key terms

BCA	Business Development Capacity Assessment
CCC	Christchurch City Council
CDEM 2002	Civil Defence Emergency Management Act 2002
CRPS	Canterbury Regional Policy Statement
DPR	District Plan Review
ECan	Environment Canterbury
FDS	Future Development Strategy
FUDA	Future Urban Development Area
GCP	Greater Christchurch Partnership
GPA	Greenfield Priority Area
GPS-HUD	Government Policy Statement on Housing and Urban Development
GRZ	General Residential Zone
HBA	Housing and Business Development Capacity Assessment
HCA	Housing Development Capacity Assessment
IBC	Indicative Business Case
IPCC	Intergovernmental Panel on Climate Change
IPI	Intensification Planning Instrument
LGA	Local Government Act 2002
LLRZ	Large Lot Residential Zone
LTP	Long Term Plan
LURP	Land Use Recovery Plan
MDRS	Medium Density Residential Standards
MfE	Ministry for the Environment
MRT	Mass Rapid Transit
MRZ	Medium Density Residential Zone
NZCPS 2010	New Zealand Coastal Policy Statement 2010
NPS	National Policy Statement
NPS-UD	National Policy Statement on Urban Development 2020 (updated May 2022)
NPS-HPL	National Policy Statement for Highly Productive Land 2022
RMA	Resource Management Act 1991
RMA-EHS	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021
SDC	Selwyn District Council

TA	Territorial Authority
UGA	Urban Growth Agenda
UGO	Urban Growth Overlay
UDS	Urban Development Strategy
WDC	Waimakariri District Council

1. Introduction

The draft Greater Christchurch Spatial Plan (GCSP) was released for public consultation by the Urban Growth Partnership for Greater Christchurch – the Whakawhanake Kāinga Komiti¹, in June 2023.

This Officers' Report has been prepared to:

- briefly outline the purpose of the draft Spatial Plan
- document the future development strategy requirements of the National Policy Statement on Urban Development 2020 (NPS-UD) that relate to the draft Spatial Plan
- describe the consultation and engagement process adopted for the draft Spatial Plan
- provide an officers' response to points made in the submissions received on the draft Spatial Plan
- provide officers' recommendations on proposed changes to the draft Spatial Plan to address submission points.

This Officers' Report is provided to the Hearings Panel established to consider submissions and make recommendations to the Whakawhanake Kāinga Komiti. It will also be circulated to all submitters ahead of the hearings to inform those submitters wishing to be heard by the Hearings Panel.

¹ The Whakawhanake Kāinga Komiti partners include: Mana whenua, Environment Canterbury, Christchurch City Council, Selwyn District Council, Waimakariri District Council, Te Whatu Ora – Health New Zealand, Waka Kotahi NZ Transport Agency, Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development, Kāinga Ora and Te Tari Taiwhenua – Department of Internal Affairs

1.1 Report Navigation

The Officers' Report can be navigated by using the 'bookmarks'. These link to the headings throughout the report and enable quick location and navigation to headings or topics of interest. This applies to the appendices that include the submission points by topics and submission points by submitter, allowing quick navigation to view similar submission points or to view the posits of each individual submitter.

Officers have identified a number of themes arising from submissions. These have been grouped under key headings relating to the format of the draft Spatial Plan in Section 4 of this report. Each theme has high level summary of submissions, including a summary of the *Have Your Say* form responses² and a high level summary of the coded submission points, where possible. Each theme then also has a response to submissions from the Officers and recommendations.

The themes and responses are considered collectively in Section 4 of the report. Responses to submissions are around the overall themes: there is not an individual response to each submission or submission point.

Submission points were coded directly to particular topics/themes. Points were either copied and pasted across or were 'snipped' from PDFs and an image of the point provided. The points were not summarised. It's important to note that some points were coded to multiple topics and may be addressed in multiple locations if they were relevant. Many submissions will have 'coder notes' provided in brackets eg [..text....]. These notes can indicate what questions the code came from in relation to the *Have your Say* form³ and whether the submitter supported it or not eg [Q4: No]. They may also provide some context to the submission point and/or where else that submission point may have been coded to.

Appendix 1 collates the submission points by theme, coded from the submissions, enabling readers to view the submission points collectively under each theme. The heading of each theme describes where in Section 4 of the Officer Report that the response to the submission points can be found.

Appendix 2 collates the submission points by each submitter, enabling readers to view each individual submitters points. The Category column (Column 2) in each table indicates where each submission point is responded to in Section 4 of the Officer Report.

Appendix 3 collates the recommended changes to the draft Spatial Plan by the Officers. The recommended changes in Appendix 3 are in order of where they would appear in the draft Spatial Plan.

Appendix 4 contains a 'Mark Up' version of the draft Spatial Plan that includes the recommended changes of the Reporting Officers

The officers who have prepared this report are Ben Rhodes, George Sariak, Janice Carter, Rachel McClung, and Tammy Phillips. A summary of their qualifications and experience is included in **Appendix 5**.

The responses and recommendations represent the officers' collective, consensual and independent opinion. This has been fully informed by the supporting material published as part of the draft Spatial Plan consultation,

² Only 287 of the 358 Submissions used the online *Have your Say* form, while the remainder used email or paper copies.

³ The *Have Your Say* questions are outlined in Section 3.2 of this report.

the content of submissions, and feedback received from GCP partner staff. They are not necessarily the views held by other partner staff or partner organisations.

2. Background

2.1 Development of the Greater Christchurch Spatial Plan

In 2022, the Greater Christchurch Partnership and the Crown established an Urban Growth Partnership for Greater Christchurch – the Whakawhanake Kāinga Komiti – to collectively plan for the future growth of the sub-region. The partnership is focused on shared objectives related to affordable housing, emissions reduction, and creating liveable and resilient urban areas. The first priority of the partnership was to develop the Greater Christchurch Spatial Plan.

The purpose of the Spatial Plan is to:

- Set a desired urban form for a projected population of 700,000 (to 2051) and beyond that to 1 million people to ensure Greater Christchurch is future-proofed in the context of population growth and climate change.
- Deliver the first priority of the Urban Growth Partnership for Greater Christchurch: a Spatial Plan that coordinates and aligns the aspirations of central government, local government and mana whenua.
- Satisfy the requirements of the National Policy Statement on Urban Development for the Greater Christchurch councils to jointly prepare a Future Development Strategy.

There has been a coordinated approach to urban planning and transport investment in Greater Christchurch since 2007, when the Greater Christchurch Partnership was established.

The Greater Christchurch Urban Development Strategy 2007 and Our Space 2018-2048 – Greater Christchurch Settlement Pattern Update established the framework for urban planning which informs this current work. The Public Transport Futures Combined Business Case set out an investment programme for improvements across the Greater Christchurch public transport system.

The current Urban Growth Programme builds on this work, considering future opportunities and challenges and integrating urban and transport planning for our urban areas. The Greater Christchurch Spatial Plan will replace the previous plans and strategies developed for Greater Christchurch.

2.2 Relationship with other processes

Several other processes are occurring at the same time as the development of the draft Spatial Plan. These include Plan Change 14 to the Christchurch City Council District Plan (PC14), the Selwyn and Waimakariri District Council District Plan Reviews (DPRs) and multiple Private Plan Change Requests (PPCs).

It is important to understand that the Spatial Plan is not a statutory RMA document. The FDS component is required to be completed under the NPS-UD, but the process and document have been developed under the Local Government Act. The development of the Canterbury Regional Policy Statement, Regional Plans, District Plans and other RMA processes must have regard to the Spatial Plan, but do not have to give effect to it. As such, the draft Spatial Plan, and the final Spatial Plan, does not negate decisions or input on specific outcomes

in RMA processes under way (such as PC14 and District Plan reviews): rather, the Spatial Plan is intended to inform and guide these and other future processes across a longer and more aspirational and strategic timeframe.

The draft Spatial Plan as a strategic document sets direction for the growth direction of greater Christchurch and future District Plans and Plan Changes. The current processes mentioned above are implementing existing strategies and national direction. The draft Spatial Plan is the next generation strategic document to set the direction for the next 30 years and beyond. It is built on the foundation of existing strategic work (it has not been developed in a vacuum), and takes some direction from existing plans and processes, particularly around constraints to development and level of enablement for business, residential and community activity.

However, the draft Spatial Plan is not required to align with existing processes and plans as it is a forward-looking document which considers future directions for growth, and development, among other aspects.

As the draft Spatial Plan is only in the development stage, existing RMA processes⁴ do not have to consider or have regard to the draft. To put it another way, the Draft Spatial Plan does not influence those processes.

Once the draft Spatial Plan is developed and approved then it will have some influence in those other processes. RMA processes such as plan changes and district plan reviews play an important role in implementing the direction of the Spatial Plan, and those processes will have to have regard to the Spatial Plan and its direction.

2.3 Broad phases of work and key project milestones

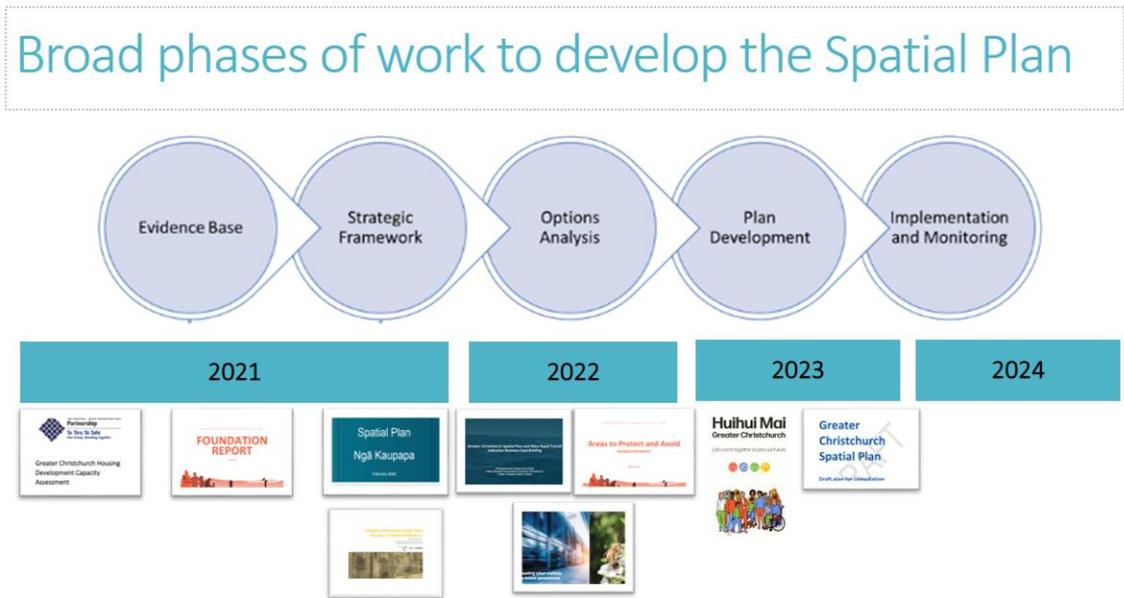


Figure 1: Broad phases of work to develop the Spatial Plan

⁴ For example Plan change 14, District Plan Reviews and Private Plan Changes.

Date	Milestone
2022	Whakawhanake Kāinga Komiti, Urban Growth Partnership for Greater Christchurch established
13 May 2022	Whakawhanake Kāinga Komiti adopted the Greater Christchurch Spatial Plan Foundation Report and the Ngā Kaupapa report, and agreed the Greater Christchurch Spatial Plan Strategic Framework
December 2022	Evaluation of Urban Form Scenarios completed
23 February – 26 March 2023	‘Huihui Mai – let’s come together to plan our future’ public engagement was held from 23 February – 26 March 2023 to seek community input and test the work to date to inform the development of the draft Spatial Plan and the Mass Rapid Transit (MRT) Indicative Business Case work.
12 May 2023	Whakawhanake Kāinga Komiti approved GCSP for consultation
16-17 May 2023	Partner governance endorsed GCSP for consultation
19 June – 23 July 2023	Public consultation on Draft GCSP

2.4 Key background documents

Work to prepare the evidence base, develop the strategic framework to underpin and guide the work, analyse different scenarios, and engage with the community is summarised in the documents listed below.

The **Foundation Report** summarises the identification of urban opportunities and challenges, and the development of the strategic framework to guide the spatial plan. The Foundation Report sets out:

- The context and approach to the development of the draft Spatial Plan.
- An assessment of the current state across a range of spatial and wellbeing aspects including the natural environment, people and communities, homes and places, economy and jobs, and access and mobility.
- An articulation of the opportunities for Greater Christchurch’s urban area which describe why change is required and what needs to be done to achieve it.

The **Ngā Kaupapa Report** was prepared by Mahaanui Kurataiao on behalf of mana whenua and identifies and describes:

- The cultural values within the boundary of Greater Christchurch
- Relevant cultural principles
- An assessment of relevant Iwi Management Plan policies and other strategy documents to inform and guide the development of the spatial plan

The Ngā Kaupapa Report was prepared to be part of and to inform the Foundation Report. The main purpose of the report is to ensure that the spatial planning team and partners understand the legal framework

underpinning the Treaty partnership and some core mana whenua principles and values for the Greater Christchurch area. It is not a representation of mana whenua priorities and expectations.

The **Greater Christchurch Housing Development Capacity Assessment March 2023** is an assessment of Greater Christchurch's capacity to meet the projected demand for housing over the next 30 years.

The **Greater Christchurch Business Development Capacity Assessment April 2023** is an assessment of Greater Christchurch's capacity to meet the projected demand for business over the next 30 years.

The **Urban Form Scenarios Evaluation Report December 2022** summarises the work undertaken to evaluate Urban Form Scenarios. The purpose of this was to understand how different land-use scenarios and transport packages contributed to the realisation of the outcomes and priorities as set out in the Greater Christchurch Spatial Plan Strategic Framework, to inform the development of urban form direction and development of the draft Plan.

The **Areas to Protect and Avoid Background Report February 2023** details the methodology and reasoning for identifying land development constraints, and areas to protect, to inform the development of the Greater Christchurch Spatial Plan.

The **Engagement Reports** provide a summary of feedback from the community and youth through the Huihui Mai Engagement which has informed the development of the draft Spatial Plan.

- Full Huihui Mai Community Engagement Report
- Youth Engagement Report

2.5 National Policy Statement on Urban Development 2020

The National Policy Statement on Urban Development 2020 (NPS-UD) came into force on 20 August 2020 and was subsequently amended in 2022 following the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (RMA-EHS). The NPS-UD is a national policy statement prepared under the Resource Management Act 1991 (RMA). The purpose of a national policy statement is to state objectives and policies for matters of national significance that are relevant to achieving the purpose of the Resource Management Act 1991 (RMA).

The NPS-UD represents part of the urban planning pillar of the Government's Urban Growth Agenda (UGA). The NPS-UD recognises the national significance of 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. This includes the provision of sufficient development capacity for housing and business land to meet the different needs of people and communities.

The NPS-UD consists of four parts: the first part contains preliminary provisions, part two states the objectives and policies, part three outlines implementation requirements and part four sets out the timeframes for implementation. Part four has since been altered by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (RMA-EHS).

The infographic below provides a high-level overview of the NPS-UD as well as the interdependencies between the provisions.

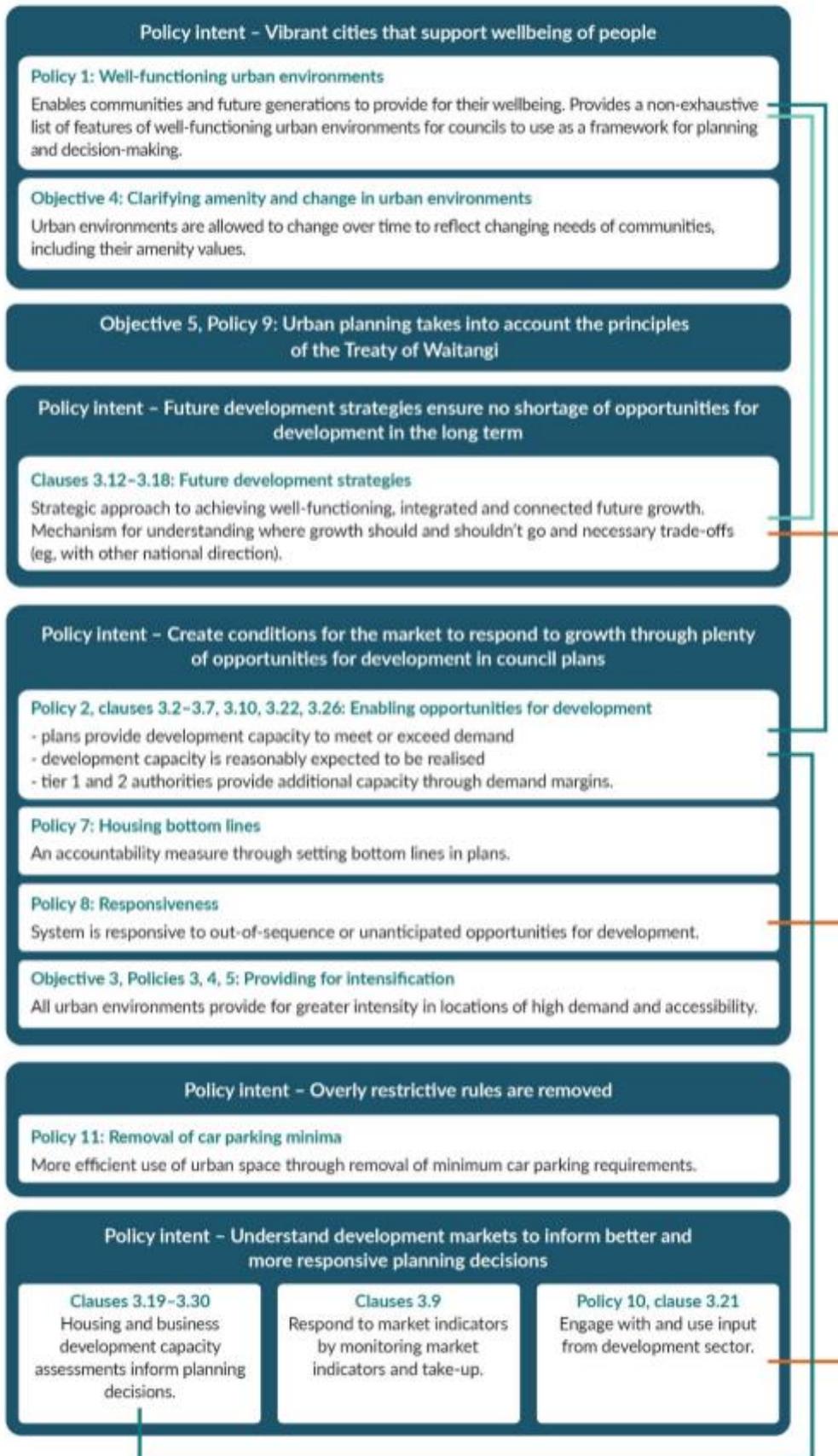


Figure 2: High-level overview of the NPS-UD

Part 1: Preliminary provisions

This part specifies the commencement, the application and interpretation of the NPS-UD. The NPS-UD applies to all urban environments categorised into the three tiers based on population size and growth rates⁵.

Christchurch is defined as a tier 1 urban environment in the NPS-UD and includes the tier 1 local authorities of Canterbury Regional Council, Christchurch City Council, Selwyn District Council, and Waimakariri District Council. The NPS-UD applies to planning decisions by any local authority that affect an urban environment. Certain provisions of the NPS-UD are only applicable to tier 1, 2, or 3 local authorities.

Part 2: Objectives and Policies

The objectives and high-level policies of the NPS-UD apply to all local authorities that have all or part of an urban environment within their district or region.

Part 3: Implementation

This part sets out a non-exhaustive list of things that local authorities must do to give effect to the objectives and policies of the NPS-UD. For the purposes of this report, and for their relevance to the draft Spatial Plan, commentary is provided on Subparts 1, 2, 3 and 5 of Part 3 of the NPS-UD. As the draft Spatial Plan represents the FDS for the tier 1 urban environment of Christchurch, specific discussion on Subpart 4 Part 3 of the NPS-UD and the requirements of an FDS is provided in the subsequent section on the scope of the draft Spatial Plan.

Subpart 1 Part 3 - Providing Development Capacity

Subpart 1 Part 3 requires every tier 1 local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing in the short term, medium term, and long term.⁶ In order to be sufficient, development capacity must be plan-enabled, infrastructure-ready, feasible and reasonably expected to be realised, and meet the expected demand plus the appropriate competitiveness margin.

⁵ **Urban environment** means 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.

⁶ **Short term** means within the next Three years, **short-medium term** means within the next 10 years, **medium term** means between 3 and 10 years and **long term** means between 10 and 30 years. The draft Spatial Plan also makes reference to the **longer term** which is a timeframe beyond the long-term, out to a population of 1 million.

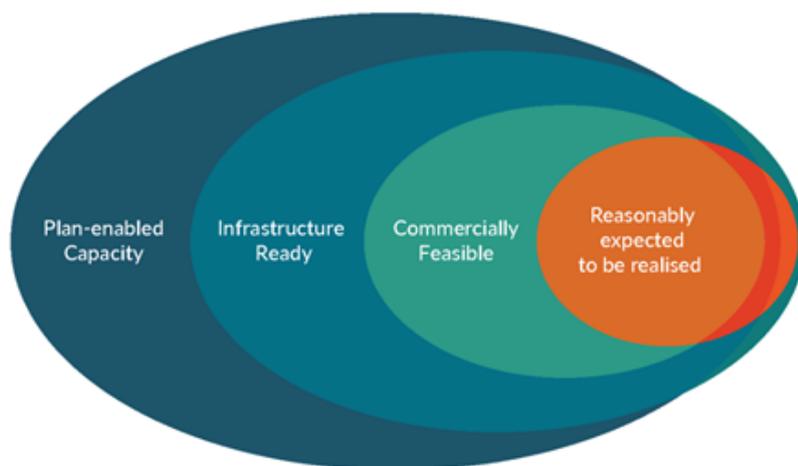


Figure 3: Ranges of Development Capacity

Subpart 1 Part 3 also requires every tier 1 local authority to provide at least sufficient development capacity in its region or district to meet expected demand for business land in the short term, medium term, and long term. In order to be sufficient, development capacity must be plan-enabled, infrastructure-ready, suitable, and meet the expected demand plus the appropriate competitiveness margin.

Sufficient development capacity is inextricably linked with the Housing and Business Development Capacity Assessment (HBA) of Subpart 5 Part 3 which in turn informs the housing bottom lines of Subpart 1 Part 3. The housing bottom lines of Subpart 1 Part 3 state the amount of development capacity that is sufficient to meet expected housing demand plus the appropriate competitiveness margin in the region and each constituent district of a tier 1 urban environment. The most recent Housing Development Capacity Assessment (HCA) identified the housing bottom lines to be inserted into the Canterbury Regional Policy Statement and the attributed proportion into each district plan of the three territorial authorities of Greater Christchurch⁷. These housing bottom lines are contained within Table 2 of the GSCP as the identified demand for housing with the appropriate competitiveness margin.

Subpart 1 Part 3 requires a response where a local authority determines that there is insufficient development capacity over the short term, medium term, or long term. The required response consists of immediately notifying the Minister for the Environment of the shortfall and if the insufficiency is wholly or partly a result of RMA planning documents, changing those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy (including any FDS) and consider other options for increasing development capacity and otherwise enabling development. The most recent HCA identified insufficient development capacity for housing in the Selwyn District in the long-term. The most recent Business Development Capacity Assessment (BCA) identified a shortfall of commercial development capacity in the long term for Christchurch City and Selwyn⁸. In response

⁷ Greater Christchurch Spatial Plan (2023) Greater Christchurch Housing Development Capacity Assessment March 2023. [Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf](https://www.greaterchristchurch.org.nz/~/media/2023/03/23/Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf) ([greaterchristchurch.org.nz](https://www.greaterchristchurch.org.nz))

⁸ Greater Christchurch Spatial Plan (2023) Greater Christchurch Housing Development Capacity Assessment March 2023. [Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf](https://www.greaterchristchurch.org.nz/~/media/2023/03/23/Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf) ([greaterchristchurch.org.nz](https://www.greaterchristchurch.org.nz))

to the identified shortfall in Greater Christchurch, the draft Spatial Plan as an FDS must increase development capacity for housing and business land.

Subpart 2 Part 3 – Responsive Planning

Responsive planning seeks to ensure that local authorities respond to development proposals that would add significantly to development capacity and contribute to well-functioning urban environments, regardless of whether they are planned for or anticipated. Subpart 2 Part 3 implements that the objectives and policies of the NPS-UD generally, however through the term “responsive” has a specific relationship with Objective 6(c) and Policy 8. Subpart 2 Part 3 applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release. Subpart 2 Part 3 requires every local authority to have particular regard to the development capacity provided by a plan change if that development capacity would contribute to a well-functioning urban environment, is well-connected along transport corridors and criteria for significant development capacity. At this stage criteria for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity is under development and will be inserted into the Canterbury Regional Policy Statement.

Subpart 3 Part 3 – Evidence-Based Decision-Making

Subpart 3 Part 3 contains provisions for evidence-based decision-making in relation to monitoring, assessing demand and development capacity as well as using evidence and analysis.

Subpart 3 Part 3 sets out monitoring requirements for every tier 1, 2, and 3 local authority. The required monitoring must relate to the relevant urban environments but may apply more widely. As more than one tier 1 has jurisdiction over the tier 1 urban environment, the local authorities of the tier 1 urban environment of Christchurch are jointly responsible for doing the monitoring required by this subpart.

The requirements specify that local authorities must monitor, quarterly, the following in relation to each urban environment in their region or district:

- the demand for dwellings
- the supply of dwellings
- prices of, and rents for, dwellings
- housing affordability
- the proportion of housing development capacity that has been realised in previously urbanised areas (such as through infill housing or redevelopment)
- the proportion of housing development capacity that has been realised in previously undeveloped (ie, greenfield) areas
- available data on business land

The monitoring of housing and business market indicators provides local authorities with a robust and frequently updated evidence base that can be used to inform planning decisions, FDs, and to ensure at least enough development capacity is enabled at all times.

In relation to tier 1 urban environments, tier 1 local authorities must monitor the proportion of development capacity that has been realised in each zone identified in city centre zones, metropolitan centre zones, town centre zones, mixed use zones, high density residential zones, medium density residential zones and general residential zones. Realised capacity builds on the concept of 'take-up of development capacity' that was in the NPS-UDC⁹.

Every tier 1, 2, and 3 local authority must publish the results of its monitoring at least annually. The HCA and BCA prepared by the Greater Christchurch Partnership satisfies the monitoring requirements of the NPS-UD. As a HBA is prepared every Three years, a discrete annual publication of quarterly monitoring will be required between triannual HBAs to continue to satisfy the monitoring requirements of the NPS-UD.

Subpart 3 Part 3 sets out the requirement to assess the demand for housing and for business land in urban environments, and the development capacity that is sufficient to meet that demand in its region or district in the short term, medium term, and long term. For tier 1 and 2 local authorities this is satisfied by preparing and publishing an HBA as required by Subpart 5 Part 3.

Subpart 3 Part 3 requires local authorities when making plans, or when changing plans in ways that affect the development of urban environments to:

- clearly identify the resource management issues being managed; and
- use evidence, particularly any relevant HBAs, about land and development markets, and the results of the monitoring required by this National Policy Statement, to assess the impact of different regulatory and non-regulatory options for urban development and their contribution to:
- achieving well-functioning urban environments; and
- meeting the requirements to provide at least sufficient development capacity.

The HCA and BCA provide a comprehensive and robust evidence base to inform spatial planning decisions for Greater Christchurch and satisfies the requirement for evidence-based decision-making of the NSP-UD.

Subpart 5 Part 3 - Housing and Business Development Capacity Assessment (HBA)

Subpart 5 Part 3 requires tier 1 local authorities to prepare, and make publicly available, an HBA for its tier 1 urban environment every three years, in time to inform the relevant local authority's next long-term plan. The Greater Christchurch Partnership prepared its first HCA in 2018 under the previous National Policy Statement on Urban Development Capacity (NPS-UDC), with subsequent assessments in 2021 and 2023 under the NPS-UD. The HBA must apply, at a minimum, to the relevant tier 1 urban environment, but may apply to any wider area. The 2023 HCA and BCA extend beyond the tier 1 urban environment of Christchurch to include the

⁹ Ministry for the Environment (2020) Guidance on Housing and Business Development Capacity Assessments (HBAs) under the National Policy Statement on Urban Development. Wellington: Ministry for the Environment.

entirety of the territorial authority areas of Christchurch, Selwyn and Waimakariri. The 2023 HCA and BCA was jointly prepared by the local authorities of Greater Christchurch as required by the NPS-UD.

The NPS-UD states that the purpose of the HBA is to:

- provide information on the demand and supply of housing and of business land in the relevant tier 1 or tier 2 urban environment, and the impact of planning and infrastructure decisions of the relevant local authorities on that demand and supply; and
- inform RMA planning documents, FDSs, and long-term plans; and
- quantify the development capacity that is sufficient to meet expected demand for housing and for business land in the short term, medium term, and long term.

The purpose of the HBA is met through the preparation of the 2023 HCA and BCA which will inform RMA planning documents, the draft Spatial Plan and long-term plans. The 2023 HCA and BCA quantifies the development capacity that is sufficient to meet expected demand for housing and for business land in the short term, medium term, and long term. Furthermore, the 2023 HCA and BCA provides information on the demand and supply of housing and of business land for the tier 1 urban environment, and the impact of planning and infrastructure decisions of the relevant local authorities on that demand and supply.

Subpart 5 Part 3 requires the involvement of the development sector and others in the preparation of an HBA. This requires that information and comment be sought from expert or experienced people in the development sector, providers of development infrastructure and additional infrastructure and anyone else who has information that may materially affect the calculation of the development capacity. To inform the 2023 HCA and BCA, the partner councils of the Greater Christchurch Partnership identified parties most actively involved in the development sector and significant landowners and asked these parties to undertake a market demand and intentions survey. Those surveyed responded to questions about their views on the demand and supply of land for residential and business development within the Greater Christchurch area, supply issues or barriers to development, and development intentions and possible timing for these. In addition to this survey, Christchurch City Council, Selwyn District Council and Waimakariri District Council met with developers to inform the HCA, BCA and the draft Spatial Plan. Further details on the survey and developer meetings can be found in the HCA and BCA.

Subpart 5 Part 3 requires the use of a competitiveness margin in an HBA to support choice and competitiveness in housing and business land markets. A competitiveness margin is a margin of development capacity, over and above the expected demand that tier 1 local authorities are required to provide. The competitiveness margins for both housing and business land are 20% for both the short-term and medium-term, as well as 15% for the long-term. These specified competitiveness margins are incorporated into the 2023 HCA and BCA.

The remainder of Subpart 5 Part 3 sets out the requirements for undertaking an HCA. In terms of housing, this includes analysis of the housing market and impact of planning, housing demand, housing development capacity, estimates of what is feasible and reasonably expected to be realised and assessing the sufficiency of development capacity. In terms of business land, this includes a land demand assessment, business development capacity assessment and assessing the sufficiency of development capacity. The 2023 HCA and BCA satisfies these requirements of the NPS-UD as they were prepared in accordance with the NPS-UD including this subpart.

2.6 Scope of the Greater Christchurch Spatial Plan

For the purpose of the NPS-UD, the Greater Christchurch Spatial Plan satisfies the requirement of Subpart 4 Part 3 to prepare and make publicly available an FDS. The purpose of an FDS is to promote long-term strategic planning by setting out how a local authority intends to achieve well-functioning urban environments in its existing and future urban areas, provide at least sufficient development capacity over the next 30 years to meet expected demand and assist the integration of planning decisions with infrastructure planning and funding decisions. Although the Greater Christchurch Spatial Plan represents the FDS for the tier 1 urban environment of Christchurch, the draft Spatial Plan has a much broader scope than the requirements of the NPS-UD for an FDS. The NPS-UD is not highly prescriptive in terms of the required content of an FDS, however, there are certain mandatory requirements. These requirements, and the assessment of the draft GCSP against them have been set out in table below:

Table 1: Requirements and Assessment of the NPS-UD

NPS-UD requirements for FDS	Great Christchurch Spatial Plan (GCSP)
3.12 Preparation of FDS	
<p>3.12(1) Local authorities must prepare, and make publicly available an FDS for the urban environment every 6 years or to inform, or at same time as, preparation of the next long-term plan</p>	<p>The draft Spatial Plan has been prepared to meet this requirement. The draft Spatial Plan represents the FDS for the urban environment of Christchurch. The draft Spatial Plan has been prepared alongside the Partnership local authorities’ preparation of their respective Long Term Plans for 2024-34.</p> <p>The NPS-UD requires the first FDS made publicly available after the commencement date to be in time to inform the 2024 long-term plan. The draft Spatial Plan does not satisfy this requirement. The draft Spatial Plan is to be updated (as needed) every five years. This satisfies the requirement of clause 3.12(1).</p>
<p>3.12(2) - The FDS must apply, at a minimum, to the relevant urban environments of the local authority, but may apply to any wider area</p>	<p>The draft Spatial Plan applies to the urban environment of Christchurch, referred to as Greater Christchurch.</p>
<p>3.12(3) - If more than one local authority has jurisdiction over urban environment, those authorities are jointly responsible for preparing an FDS as required by this subpart.</p>	<p>The draft Spatial Plan has been prepared by the Partnership which includes the relevant local authorities as set out in the NPS-UD.</p>
<p>3.12(3) –An FDS may be prepared and published as a stand-alone document, or be treated as part of any other document (such as a spatial plan).</p>	<p>The draft Spatial Plan represents the FDS for the urban environment of Christchurch, referred to as Greater Christchurch. The draft Spatial Plan is to be published as a stand-alone document.</p>

3.13 Purpose and content of FDS	
<p>3.13(1)(a) Purpose of FDS is to promote long-term strategic planning</p>	<p>The draft Spatial Plan promotes long term strategic planning. The draft Spatial Plan considers how to accommodate a population of 1 million in Greater Christchurch which is projected to be in sixty years.</p>
<p>3.13(1)(a)(i) setting out how a local authority intends to achieve well-functioning urban environments in its existing and future urban areas;</p>	<p>The draft Spatial Plan as a whole sets out how well-functioning urban environment will be achieved through opportunities and directions as well as the key moves.</p> <p>The NPS-UD describes a well-functioning urban environment as urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: <ul style="list-style-type: none"> (i). meet the needs, in terms of type, price, and location, of different households; and (ii). enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change. <p>The draft Spatial Plan enables a variety of homes, with respect to type, price and location. The draft Spatial Plan enables kāinga nohoanga on Māori Reserve Land and signals that further work is needed to enable kāinga nohoanga within the urban areas of Greater Christchurch. In the joint work programme of the draft Spatial Plan is the Kāinga Nohoanga Strategy which will provide direction to partners on how to support and enable kāinga nohoanga within urban areas and on Māori Land.</p> <p>The draft Spatial Plan enables space for business across a network of urban and town centres across</p>

	<p>Greater Christchurch. The draft Spatial Plan directs that sufficient business land be provided for commercial and industrial uses that are well integrated with transport links and the centres network. This enables a variety of sites of business land by location and size that are suitable for different business sectors. The key employment areas and economic assets of Greater Christchurch are spatially identified on Map 13 of the draft Spatial Plan.</p> <p>The draft Spatial Plan provides for good accessibility and supports reductions in greenhouse gas emissions. This is principally through direction on urban form and the prioritisation of sustainable transport choices, which includes public transport and active modes.</p> <p>The draft Spatial Plan ensures that future development is directed away from areas subject to significant risks from natural hazards and the effects of climate change.</p>
<p>3.13(1)(a)(ii) setting out how a local authority intends to provide at least sufficient development capacity, over the next 30 years to meet expected demand</p>	<p>The HCA and BCA outline what is sufficient development capacity to meet expected demand over the next 30 years. The draft Spatial Plan has outlined how and where this will be met.</p>
<p>3.13(1)(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.</p>	<p>The draft Spatial Plan assists the integration of planning decisions with infrastructure planning and funding decisions. This is achieved by the direction that the draft Spatial Plan provides for partnership on land-use and infrastructure over the long-term. The direction will be implemented through the joint work programme, council plans and strategies, long-term plans and infrastructure strategies.</p>
<p>3.13(2) Every FDS must spatially identify:</p> <p>(a) The broad locations in which development capacity will be provided over the long term, in both existing and future urban areas</p>	<p>In response to this requirement the draft Spatial Plan has spatially identified broad locations for housing and business development both in existing urban areas and for new urban areas. The broad locations for housing and business development capacity in both existing and future urban areas are shown (spatially identified) on Map 14 of the draft Spatial Plan. Furthermore, the Priority Development Areas which are spatially identified on Map 4 represent areas that offer significant opportunities for accelerated urban development (residential and business development capacity in existing urban areas).</p>
<p>3.13(2) Every FDS must spatially identify:</p>	<p>The NPS-UD states that development infrastructure means the following, to the extent they are controlled by a local authority or council-controlled organisation</p>

<p>(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it;</p>	<p>(as defined in section 6 of the Local Government Act 2002):</p> <ul style="list-style-type: none"> (a) network infrastructure for water supply, wastewater, or stormwater (b) land transport (as defined in section 5 of the Land Transport Management Act 2003) <p>The NPS-UD states that additional infrastructure means:</p> <ul style="list-style-type: none"> (a) public open space (b) community infrastructure as defined in section 197 of the Local Government Act 2002 (c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities (d) social infrastructure, such as schools and healthcare facilities (e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001) (f) a network operated for the purpose of transmitting or distributing electricity or gas. <p>In response to this requirement the draft Spatial Plan has identified any critical development infrastructure required to support development capacity, with the key move in land transport. The draft Spatial Plan outlines the key public transport routes, as well as the corridor for a MRT, to support development capacity (Map 15 of the draft Spatial Plan). Any other development and additional infrastructure will be provided through subsequent LTPs and infrastructure strategies.</p>
<p>3.13(2) Every FDS must spatially identify:</p> <ul style="list-style-type: none"> (c) Any constraints on development 	<p>In response to this requirement the draft Spatial Plan has identified a number of constraints to development and areas to avoid development. These are contained in Part 1 of the draft Spatial Plan and are spatially identified.</p>
<p>3.13(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development</p>	<p>The draft Spatial Plan has outlined mana whenua priorities and expectations. This is included in the 'Looking to the Future' section of the draft Spatial Plan.</p>
<p>3.14 What FDSs are informed by</p>	

<p>3.14(1) Every FDS must be informed by the following:</p> <ul style="list-style-type: none"> (a) The most recent and applicable HBCA (b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS; (c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans; (d) Māori, and in particular tangata whenua, values and aspirations for urban development; (e) Feedback received through the consultation and engagement with (3.15): <ul style="list-style-type: none"> <i>Local Authorities, relevant central government agencies, relevant hapū and iwi, providers of additional infrastructure, relevant providers of nationally significant infrastructure and the <u>development sector (to identify significant future development opportunities and infrastructure requirements)</u></i> (f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement (g) any other relevant national policy required by, or issued under, legislation. 	<p>In response to the requirements, the:</p> <ul style="list-style-type: none"> (a) HBA and BCA have been updated alongside the development of the draft Spatial Plan. (b) Further, the development of the draft Spatial Plan was informed by an evaluation of different Urban Form Concepts. The draft Spatial Plan also considered how a population of 1m people could be accommodated, which provides responsiveness should faster population growth than is projected occurs; (c) Relevant LTP and infrastructure strategies were considered in assessing infrastructure capacity and needs; (d) Mana whenua priorities and expectations have been outlined. The draft Spatial Plan also outlines a key move in the prosperous development of kāinga nohoanga; (e) Huihui Mai engagement was extensive and was done to inform the development of the draft Spatial Plan. Key aspects informed by this engagement are outlined in the ‘What we heard’ section of Draft GCSP. Further, consultation with the relevant parties was undertaken directly either by the local authorities and central government; (f) Other NPS’ were considered in the development of the draft Spatial Plan. (g) Other relevant national policy has been considered in the preparation of the draft Spatial Plan. This includes the Government Policy Statement on Housing and Urban Development, the Government Policy Statement on Land Transport and the First Emissions Reduction Plan. Background documents to the draft Spatial Plan indicate broader consideration of the legislative and policy context.
<p>3.15 Consultation and engagement</p>	
<p>3.15 (1) Must use the special consultative procedure in section 83 of the Local Government Act 2002</p>	<p>The draft Spatial Plan will follow the special consultative procedure.</p>
<p>3.15(2) In order to prepare the draft required by that procedure, local authorities must engage with the following:</p> <ul style="list-style-type: none"> (a) other local authorities with whom there are significant connections relating to infrastructure or community 	<p>Huihui Mai was an extensive engagement phase undertaken between 23 February 2023 to 3 April 2023 to inform the development of the draft Spatial Plan. Key aspects informed by this engagement are outlined in the ‘What We heard’ section of the draft Spatial Plan.</p>

<ul style="list-style-type: none"> (b) relevant central government agencies (c) relevant hapū and iwi (d) providers of additional infrastructure (e) relevant providers of nationally significant infrastructure (f) the development sector (to identify significant future development opportunities and infrastructure requirements). 	<p>Further, consultation with the relevant parties was undertaken directly either by the local authorities and central government. This occurred through individual stakeholder meetings (including the development sector and infrastructure providers) or through workshops in relation to central government agencies (or directly in the case of MoE).</p> <p>Mana whenua were a partner in the process of developing the draft Spatial Plan.</p> <p>The partnership is committed to ongoing discussions and dialogue with these relevant parties beyond the required engagement and consultation for the development of the draft Spatial Plan.</p>
<p>3.16 Review of FDS</p>	
<p>3.16(1) Every tier 1 and tier 2 local authority must regularly review its FDS to determine whether it needs updating, and the review must be done in time to inform the next long-term plan (ie, every 3 years).</p>	<p>The draft Spatial Plan represents the first FDS prepared under the NPS-UD. The partnership previously prepared <i>Our Space 2018-2048</i>, which was an FDS under the NPS-UDC. The draft Spatial Plan is to be an enduring document and will be reviewed every five years. To ensure compliance with the NPS-UD, the FDS component of the draft Spatial Plan must be reviewed every 3 years.</p> <p>Presently the draft Spatial Plan indicates that the joint work programme will be reviewed and updated every 3 years and the draft Spatial Plan itself will be reviewed every Five years. The next review must be ahead of the Long-Term plan 2027-2037 to determine whether the draft Spatial Plan requires updating.</p>
<p>3.16(2) The review must:</p> <ul style="list-style-type: none"> (a) engage with the development sector and landowners to identify significant future development opportunities and associated infrastructure requirements; and (b) consider the most recent HBA. 	<p>The partnership has the intention of continuing to involve the development sector and landowners to identify significant future development opportunities and associated infrastructure requirements in the updating and/or replacing of an FDS. This will include involvement in the preparation of the most recent HBA which will inform any updating and/or replacing of the FDS.</p>
<p>3.16(3) If, following the review, the local authority decides that the FDS does not need updating, that decision and the reasons for it must be publicly notified.</p>	<p>The partnership must satisfy this requirement when the draft Spatial Plan review has concluded.</p>

<p>3.16(4) If, following the review, the local authority decides that the FDS is to be updated, the local authority must follow the same processes for consultation as apply to the preparation of an FDS, but only in relation to the aspects proposed to be updated.</p>	<p>The partnership must satisfy this requirement when the draft Spatial Plan review has concluded and consequentially a decision is taken to update the draft Spatial Plan.</p>
<p>3.17 Effect of FDS</p>	
<p>3.17(1)(a) Every tier 1 and tier 2 local authority must have regard to the relevant FDS when preparing or changing RMA planning documents</p> <p>3.17(1)(b) Every tier 1 and tier 2 local authority is strongly encouraged to use the relevant FDS to inform:</p> <ul style="list-style-type: none"> (i). long-term plans, and particularly infrastructure strategies; and (ii). regional land transport plans prepared by a local authority under Part 2 of the Land Transport Management Act 2003; and (iii). any other relevant strategies and plans. 	<p>The local authorities of the partnership must have regard to the draft Spatial Plan when preparing or changing RMA planning documents. The draft Spatial Plan outlines that in the ‘aligning with local and regional planning processes’ section that the draft Spatial Plan will be considered by Regional Policy Statements, District Plans, Council Plans and Strategies, Long-Term Plans (including Infrastructure Strategies).</p>
<p>3.18 FDS implementation plan</p>	
<p>3.18 (1) Every tier 1 and tier 2 local authority must prepare and implement an implementation plan for its FDS</p>	<p>The draft Spatial Plan states that the implementation of the plan will form the ongoing work programme of the partnership. Within the draft Spatial Plan is a section on Implementation. This section outlines a Joint Work Program for delivery. The monitoring section of the draft Spatial Plan states that “the partnership will establish an implementation plan and mechanisms to monitor progress in achieving the opportunities, directions and key moves set out in the Spatial Plan, and for reporting on progress of the joint work programme.” (p.92). The NPS-UD does not provide specific requirements on the content of the implementation plan.</p>
<p>3.18 (2) If a local authority consists of more than one local authority, the implementation plan must be prepared as a single document by all the local authorities that jointly prepared the FDS.</p>	<p>The GCSP implementation plan will be a single document which will involve the local authorities that jointly prepared the draft Spatial Plan.</p>
<p>3.18(3) Every implementation plan, or part of an implementation plan, must be updated annually</p>	<p>The draft Spatial Plan outlines that the Partnership will establish an implementation plan and associated mechanisms to achieve and monitor the Joint Work Program. Progress on this will be reported bi-annually</p>

	to the Whakawhanake Kāinga Komiti. Updates to the Implementation Plan can also occur annually to ensure the implementation plan remains for purpose and to achieve compliance with the NPS-UD requirements.
<p>3.18(4) An implementation plan or part of an implementation plan:</p> <p>(a) is not part of the FDS to which it relates; and</p> <p>(b) does not need to be prepared using the consultation and engagement requirements set out in clause 3.15; and</p> <p>(c) does not have the effect of an FDS as described in clause 3.17</p>	<p>The draft Spatial Plan contains a Joint Work programme to guide implementation and the subsequent development of an implementation plan. In accordance with the requirements of the NPS-UD the Partnership will develop a separate implementation plan that is not part of the draft Spatial Plan.</p>

3. Engagement and Consultation

3.1 Huihui Mai Engagement

Pre-consultation with the public took place to obtain community input and test the work to date to inform the development of the draft Spatial Plan and the Mass Rapid Transit (MRT) Indicative Business Case work by means of the Huihui Mai engagement. The *Huihui Mai – let’s come together to plan our future* engagement process was held from 23 February – 26 March 2023. The engagement included an online survey, public workshops, drop-ins, activations, and a dedicated youth engagement programme which included workshops in schools and a youth summit.

During the engagement over 7,000 people completed the online survey and over 500 people were engaged face-to-face through public and youth workshops, an online webinar, drop-ins across Greater Christchurch, and presentations to groups. Of these, over 1,300 people who completed the online survey and participated in workshops were under the age of 25.

Findings from the engagement include:

- 86% of respondents agree with the proposed direction of the draft Spatial Plan to focus growth around key urban and town centres and along public transport routes.
- 53% agree with the proposed MRT route (24% disagree). Agreement is much higher in suburbs along the MRT route (72%). For those who did not agree, a desire for improved public transport to where they live – Rolleston, Rangiora, Eastern Christchurch (i.e. not on the proposed route) is the main reason for disagreeing with the proposed route.
- 56% are open to higher density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people.
- To use their cars less, people want more frequent, more reliable and more direct public transport.

The feedback on what would encourage people to consider higher density living and using their cars less, and what people value and believe is missing in their neighbourhoods provides an important input into the implementation of the Spatial Plan.

Table 2: Themes from Huihui Mai and the draft Spatial Plan response.

Key Themes from the Engagement	How this is considered in the draft Spatial Plan
The vast majority of people agree with the direction to focus growth around urban and town centres and along public transport routes	Consistent with the direction of the draft Spatial Plan
Many people are open to high density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people	As key tools to deliver the Spatial Plan are developed (such as Priority Development Areas, Housing Plan), explicit consideration must be given to how to ensure that the development of high-density housing meets the holistic wellbeing and lifestyle needs of people.
People want effort focused on all aspects of the natural environment, with particular importance placed on improving the health of our waterways.	Inform the development and implementation of a Greater Christchurch blue-green network. This is a key move in the draft Spatial Plan.
Over half of people agree with the suggested 'turn up and go route'. Where they don't agree, it's mainly about wanting enhanced public transport / extension of the route to where they live	The draft Spatial Plan identifies the 'turn up and go route'/Mass Rapid Transit route as a key move in shaping greater Christchurch. The draft Spatial Plan seeks to focus development along these routes and centres. This is also reflected in the identification of the Priority Development Areas (arising from technical evaluation) which are focused into key locations along the 'turn up and go route'.
To use their cars less, people want more frequent, more reliable and more direct public transport.	The draft Spatial Plan identifies a number of opportunities and directions for shaping Greater Christchurch urban from to enable people to use their cars less, if they choose too.
Partnership and communication between urban development partners needs to improve to achieve better outcomes.	The draft Spatial Plan joint work programme has actions/initiatives that will require the need to establish better models for partnering / communicating with urban development partners. The draft Spatial Plan acknowledges that coordinated action with infrastructure providers and the development sector will be of particular importance to enabling the type and scale of

	development needed to achieve the desired pattern of growth
We need to protect Greater Christchurch’s role as a national and regional logistics hub.	The draft Spatial Plan as part of the Opportunity statements directions. This will also be an important component of the Greater Christchurch Transport Plan.
There are some barriers and challenges to shift the balance of commercial residential development from greenfield to higher-density housing.	The review of statutory / non-statutory tools to shift the feasibility of development is proposed as an action within the draft Spatial Plan joint work programme.

With the Huihui Mai consultation exploring what Greater Christchurch could look like in 2050, there was a large emphasis on capturing the youth voice. 1,300 youth under 25 took part in our survey, and 386 rangatahi from schools, tertiary institutions, youth councils/rōpū and participation groups participated in tailored workshops.

Key themes identified by youth included:

- There needs to be an affordable and accessible range of housing options for different groups of people, including options for intergenerational living and large whānau/aiga, when planning for future growth.
- First home buyers and flatmates would be very open to high density housing - this would need to be affordable and have good design that maintains privacy, space and energy efficiency and promotes access to green spaces.
- The ‘Turn up and go service’ could be extended to Kaiapoi and Rolleston, and out East, to make the central city and Greater Christchurch areas more accessible. Considerations for transport options are: affordability, accessibility, frequency, consistency, safety for drivers and passengers and Wi-Fi-friendly
- Climate change, a clean and green environment, and the Avon and drinking water quality is a top priority
- Safety across all aspects of living, working, transport and recreation in Greater Christchurch and on online platforms is important
- Māoritanga is embraced, visible and valued. Greater Christchurch is diverse, multi-cultural and welcoming and this is reflected in the city and in decision-making.

3.2 Consultation on the draft Spatial Plan

Following the Huihui Mai engagement, formal public consultation on the *Draft Greater Christchurch Spatial Plan* took place through a Special Consultative Procedure from 19 June to 23 July 2023.

The *Draft Greater Christchurch Spatial Plan* was published on the Greater Christchurch Partnership’s website, and hard copies were made available at the Christchurch City Council Civic Offices, Selwyn District Council Offices, Waimakariri District Council Offices, Environment Canterbury Offices, libraries and other service centres in Christchurch City, Selwyn and Waimakariri.

Supporting material, including the Housing and Business Capacity Assessment, were also published on the Partnership’s website and made available in hard copy on request.

Submissions were invited in written and electronic format. An online submission form, 'Have Your Say', was provided that included nine consultation questions, as set out in the following table, seeking views on the key issues arising in the *Draft Greater Christchurch Spatial Plan*.

Table 3: Consultation, 'Have your Say' Questions

Consultation Questions	
1	The proposed Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions. Do you support the improved public transport system proposed in the Draft Spatial Plan
2	Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing. Do you agree that we should focus future development and investment around urban centres and transport corridors?
3a	The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the Draft Spatial Plan as the blue-green network. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?
3b	One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation. Do you support the concept of a Greenbelt around our urban areas?
4	Priority development areas provide a mechanism for coordinated and focused action across multiple agencies to inform, priorities and unlock public and private sector investment. They are a key tool within the spatial plan to accelerate development in locations that will support the desired pattern of growth. The following priority development areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Do you agree with the approach to focus on these areas?
5	The Spatial Plan identifies six opportunities on how to help close the gap between the current and desired future for Greater Christchurch. Five key moves have also been identified that are essential in achieving the desired future and support the well-being of our communities. Do you support the approach taken in the Draft Spatial Plan?
6	Do you have any feedback on other aspects of the Draft Spatial Plan?

Overall, 358 submissions were received. It is important to note that some submissions were combined, duplicated, or were 'test submissions', and so the total number of submissions is not reflected by the numbering of submissions. As outlined in Section 1.1 above, a high-level summary of submissions, including a

summary of the *Have Your Say* form responses¹⁰ above, has been provided under related themes in Section 4. An overview of the responses from the *Have Your Say* form is provided below:

Table 4: Have Your Say Questions and Responses

Question	Position	Responses	%
Do you support the improved public transport system proposed in the draft Spatial Plan?	Support	166	59.29%
	Opposed	83	29.64%
	Unsure	31	11.07%
Do you agree that we should focus future development and investment around urban centres and transport corridors?	Support	189	65.85%
	Opposed	75	26.13%
	Unsure	23	8.01%
Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?	Support	208	74.02%
	Opposed	47	16.73%
	Unsure	26	9.25%
Do you support the concept of a Greenbelt around our urban areas?	Support	187	66.31%
	Opposed	62	21.99%
	Unsure	33	11.70%
Do you agree with the approach to focus on these areas? (Priority Areas)	Support	133	47.84%
	Opposed	79	28.42%
	Unsure	66	23.74%
Do you agree with the draft spatial strategy outlined above?	Support	127	47.39%
	Partially	66	24.63%
	Opposed	59	22.01%
	Unsure	16	5.97%

¹⁰ 291 of the 358 Submissions used the *Have your Say* form. Not all submitters answered every question or provided a position on each question.

4. Submission themes and officers' recommendations

4.1 Spatial Plan – General Comments

Submissions

The Spatial Strategy identifies six opportunities as to how the Spatial Plan can help to close the gap between the current and desired future states for Greater Christchurch, together with a number of directions and key moves. As part of the consultation process respondents were asked 'Q5: Do you agree with the draft Spatial Strategy outlined above?' A total of 268 submitters responded to this question using the online *Have Your Say* form. The results are as follows:

Table 5 – Responses to 'Have your Say' Question 5 - Do you agree with the draft Spatial Strategy outlined above?

Position	Number of Responses	% of total responses
Support	127	47.39%
Opposed	59	22.01%
Partially	66	24.63%
Unsure	16	5.97%

As can be seen above, the majority of submissions (72.02%) were in support or in partial support. The main themes of submissions seeking amendments are as follows:

- Hierarchy within Spatial Strategy Opportunities
- General support if development areas are shown on Map 2 and/or Map 14
- Inaccuracies and typographical errors
- Greater recognition of Infrastructure
- Engagement during implementation

A small number of submitters (5.97%) were unsure if they supported the Spatial Strategy. Their reasons included not having the time to fully consider it, lack of detail, lack of confidence in local government, confusion of a hierarchy within the opportunities, uncertainty if designs will be inclusive for disabled people, desire to have modal choice, unsure about proposed future form of the city and uncertainty about implementation.

The general reasons provided by those submitters who did not support the Spatial Strategy included wasting time and money, concerns about wellbeing of people, opposing housing intensification, preference for market to provide housing, overly restrictive, increased traffic congestion and lack of confidence in implementation.

There were also some submissions that raised matters beyond the scope of this process such as local government restructure, a stronger southern media hub for TVNZ and RNZ, changes to the Building Code, including areas outside the study area and tax breaks for business. These matters are outside the scope of the Spatial Plan and are not addressed further.

Response to Submissions

The matters raised by submitters in response to Question 5 are addresses across this report, e.g., Implementation is addressed in Section 4.11. Therefore, only those matters that are not addressed elsewhere are assessed below. These include:

- Hierarchy within Spatial Strategy Opportunities, and
- Inaccuracies and typographical errors

4.1.1 Hierarchy within Spatial Strategy Opportunities

Many submissions commented on the opportunity/opportunities that they believed should ‘come first’ or is/are more important than the others. Some submissions sought to rank or prioritise opportunities. The numbering of the opportunities appeared to confuse some submitters.

The development of the Spatial Plan was guided by a strategic framework within The Foundation Report¹¹. The strategic framework describes the priority issues that need to be addressed and the collective aspirations for the future of our people and places. It also identified the key opportunities for the Spatial Plan to address our priorities and contribute to our desired outcomes for Greater Christchurch. These priorities, outcomes and opportunities were previously agreed through the establishment of the Greater Christchurch Urban Growth Partnership and the emerging direction of Christchurch 2050.

The intent of the Spatial Plan is that there is no hierarchy between the opportunities as the opportunities, together with the directions and key moves, represent the principal ways we can close the gap between our current state and our desired future state to achieve the overarching directions of the Spatial Plan.

The Overarching Directions are:

Focus growth through targeted intensification in urban and town centres and along public transport corridors

Enable the prosperous development of Kainga nohoanga on Māori Land and within urban areas

However, we agree that the clarity of the Spatial Strategy and the connection to the strategic framework within the Foundation Report could be improved and recommend the amendments below to address this.

Recommendations

- a) Amend paragraph 6 Page 13, as follows:

Its ~~key~~**overarching** directions include a focus on targeted intensification in centres and along public transport corridors...

- b) Amend the Vision Statement on Page 14, to read as follows:

The Spatial Plan seeks to deliver on the collective community aspirations for the future of Greater Christchurch – as a place ~~that supports the wellbeing of residents both now and for generations still to come~~ **where the interrelationship between people and nature underpins a focus on intergenerational wellbeing, and positions Greater Christchurch to be a place that supports the wellbeing of generations still to come.**

- c) Rename ‘Directions’ to **Overarching** Directions’ on Pages 30 and add a new label **Directions**’ for Directions 1.1 to 6.5.

¹¹ <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Spatial-Plan/FINAL-FOUNDATIONS-GCSP-Foundations-Report-v2.pdf>

4.1.2 Inaccuracies and typographical errors

Submitters identified inaccuracies and typographical errors in the draft Spatial Strategy. These include:

- Page 3 'Next Steps' Early 2023: Partners consider adoption' should read 'Early 2024...'
- Page 19, paragraph 4 regarding motoring 'introduction of the private car in the middle of the 20th century' should read 'from the late 19th Century'.
- Page 19, paragraph 5 '...demolition of many buildings...' is an understatement of the extent of post-quake demolition of heritage buildings which numbered approximately 250, 40-50% of the city's stock.
- Incorrect depiction of the Ōpāwaho Heathcote River on Maps 2 and 14.

Page 3 of the draft Spatial Plan outlined how a submission could be made, information about webinars and a timeline for next steps. A typographical error was identified in the Next Steps timeline. As this page is within a section that contained relevant information for the community engagement phase, it is recommended that pages 2 to 7 are deleted in their entirety.

With regards to private motorcars, the first New Zealand-built motor vehicle was built in Timaru in 1896 and the first imported motor cars arrived in New Zealand in 1898¹². But it was not until the middle of the 20th Century that private motor vehicles became common place. In the early 1900s cars cost more than senior public servants earned in a year, so the initial market was limited to professionals, especially doctors, and wealthy sheep farmers. The first car in central Canterbury was owned by the runholder at Rockwood station, who had to send to Sydney for petrol¹³. Historically, the car was the ideal transport solution for New Zealand's small rural population, dispersed over a relatively large land area with rugged terrain. Low-density housing in towns and cities led to the car also being the favoured transport choice in urban areas. Only one city – Wellington – had an extensive suburban rail network and, while all other major cities have suburban bus services, many people prefer the freedom that cars allow¹⁴.

Therefore, it is recommended that the wording in paragraph 4 on Page 19 is amended as follows:

The ~~introduction~~**increased ownership** of private cars during the middle of the 20th century helped to enable the urban area to develop beyond the inner city....

With regards to the wording of paragraph 5 on Page 19, we agree that stating '...demolition of many buildings...' does not acknowledge the significant extent of post-quake demolition of heritage buildings across Greater Christchurch.

Within the Christchurch, Waimakariri and Selwyn Districts there were 1,131 listed heritage places (excluding listed archaeological sites). It is estimated that about 40% of these listed heritage places have been demolished or severely damaged¹⁵. Therefore, it is recommended that the wording in paragraph 5 on Page 19 is amended as follows:

...It resulted in the permanent displacement of whole neighbourhoods in the eastern areas of Christchurch and in Kaiapoi, and demolition of many buildings in Christchurch's Central City. **This included demolition of a significant number of Heritage Listed buildings. ...**

¹² <https://www.nzta.govt.nz/roads-and-rail/research-and-data/fascinating-facts/motoring/>

¹³ <https://teara.govt.nz/en/cars-and-the-motor-industry/page-1>

¹⁴ <https://teara.govt.nz/en/cars-and-the-motor-industry/page-1>

¹⁵ <https://quakestudies.canterbury.ac.nz/store/object/120157>

We also consider that Figure 5 on page 19 does not accurately describe how the Spatial Plan will be implemented through various plans, strategies and work programmes. We consider the term 'Give effect to' should be replaced with 'Informs' to better reflect legislative requirements.

Recommendations

a) Delete pages 2-7 that explained how to be involved and summarises the results of the online survey of the Huihui Mai engagement.

b) Amend Paragraph 4, page 19, as follows:

The ~~introduction~~ **increased ownership** of private cars during the middle of the 20th century also enabled the urban area to develop beyond the inner city....

c) Amend paragraph 5, Page 19, as follows:

'...It resulted in the permanent displacement of whole neighbourhoods in the eastern areas of Christchurch and in Kaiapoi, and demolition of many buildings in Christchurch's Central City. **This included demolition of a significant number of Heritage Listed buildings. ...**'

d) Amend Figure 5, Page 24, 'Planning context for the Spatial Plan' by replacing 'Inform' with '**Informed by**' and 'Give effect to' with '**Informs**'.

e) Amend Maps 2 and 14 (page 29 and 79 respectively) to correctly show the Ōpāwaho Heathcote River.

4.2 Opportunity 1 – Protect restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places

Submissions

No specific questions were asked on the Have Your Say submission form in relation to Opportunity 1.

Overall, 36 submission points were coded as being relevant to Opportunity 1. The majority of these were in support for this Opportunity and its directions to protect sites and areas of significance to Māori and to protect heritage generally.

However, a notable theme from submitters was the lack of specific direction around other heritage, in particular European heritage, being recognised and protected. There was also concern from some submitters about the possible loss of historic heritage when there is a focus for intensification, particularly along major corridors.

Response to Submissions

The draft Spatial Plan adopts sites and areas of cultural significance identified in the Christchurch City District Plan, and the Partially Operative Selwyn District Plan and the Proposed Waimakariri District Plan. These include Wāhi Tapu and Wāhi Taonga, Ngā Wai and Ngā Turanga Tupuna. These are all sites and areas that have been mandated by mana whenua for the purposes of district and regional planning. Of these categories, it is Wāhi Tapu and Wāhi Taonga that require protection. Ngā Wai (freshwater and coastal water) represents the essence of all life and is a source of mahinga kai. The mauri of Nga wai is to be restored and enhanced.

A number of submitters commented on other areas of the draft Spatial Plan seeking changes to directions and wording where the term ‘avoid’ was used¹⁶. It was commented that there was inconsistency with the RMA or national direction which they considered does not require the ‘avoidance’ of development or absolute protection of areas with environmental values and natural hazards.

In response to those submissions, we recommended that the use of ‘avoid’ on its own was not appropriate and have recommended to change the term ‘avoid’ to either ‘protect’ or ‘avoid or mitigate’ depending on the context it relates to in the draft Spatial Plan. To ensure consistency across the draft Spatial Plan, with regard to the use of ‘avoid’, we recommend that Direction 1.1 is amended to ‘*Protect Wāhi Tapu from urban development*’. This is also consistent with the existing wording that follows Direction 1.1 in the draft Spatial Plan.

Regarding the overall Opportunity, and Directions, to protect sites and areas of significance to Māori we do not recommend any other changes be made to the draft Spatial Plan.

As noted further above, there was majority support for Opportunity 1 of the draft Spatial Plan with submitters opposed primarily on the basis that there was a lack of direction on historic heritage.

¹⁶ See section 4.3.4 and 4.4.1 of this report.

Opportunity 1 does highlight the need to ‘Protect, restore and enhance historic heritage...’¹⁷. The context section for Opportunity 1 in the draft Spatial Plan further highlights¹⁸ that it is important that both Māori and European cultural and historic heritage is recognised and protected through the Spatial Plan.

However, no further direction is provided in Opportunity 1 regarding European culture. Direction on this matter was not included as historic heritage sites and settings of significance to European culture tend to be quite site specific and well protected in District Plans. Given their discrete nature, historic heritage sites and settings do not tend to be influential at the geographic scale of the spatial plan when considering growth direction and ‘shaping cities’. By contrast, sites of significance to Māori cover larger areas, including adjoining urban areas in Greater Christchurch, and as such have a greater influence in shaping the urban form and have a greater need to be protected against urban expansion. For these reasons the directions of the draft Spatial Plan under Opportunity 1 focused more on the sites of significance to Māori.

Given the response from a number of submitters calling for greater recognition, it is considered appropriate to provide more direction around the protection of historic heritage. This will provide further clarity in how all aspects of Opportunity 1 will be delivered, and reflects the need to protect historical heritage as a matter of national importance in the Resource Management Act 1991 (RMA).

A number of submitters raised the possibility, and concern, of losing historic heritage to make way for greater intensification. There is a tension between the need to protect historic heritage under the RMA and the direction for greater intensification in the draft Spatial Plan, and which aspect has primacy. Historic heritage is a matter of national importance under the RMA¹⁹. Further, the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (EHS Act) in seeking greater intensification does specify that territorial authority may be less enabling of development to specific qualifying matters, which include a matter of national importance under section 6 of the RMA (ie Historic Heritage). Each of the GCP territorial authority’s intensification planning instruments responding to the EHS Act have identified and used Historic Heritage as qualifying matter. The direction of the EHS Act around the qualifying matters and the territorial authority’s response to these provide confirmation that there should be primacy to historic heritage values over intensification, at least at a spatial plan level. However, it is important to recognise that, on a case-by-case basis, the appropriateness of any development impacting, either directly or indirectly, historic heritage will be considered through the administration of the relevant District Plan.

Recommendations

- a) Amend the opening text under Opportunity 1 on page 53 as follows:

The area that encompasses Greater Christchurch is part of a wider landscape that holds significant historic and contemporary cultural associations and importance for Ngāi Tahu whānui, reflecting their occupation of the area for more than 1,200 years. The Spatial Plan recognises the importance of protecting the sites and areas of significance to Māori for generations to come, and that Papatipu Rūnanga are the entities responsible for the protection of tribal interests within their respective takiwā’. **The Greater Christchurch area also has sites and buildings that are of importance in reflecting the historic heritage of the area. The Spatial Plan recognises the importance of protecting these sites and areas and integrating them into the urban environment for continued retention and viability.**

¹⁷ Opportunity 1: Protect, restore and enhance *historic heritage* and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places (emphasis added)

¹⁸ GCSP, Context Box, Point 4, page 53.

¹⁹ RMA S6(f)

- b) Insert new Direction on page 30 and in the 'Blue Box' titled 'Direction' at the bottom of page 53 as follows:

1.3 Protect, recognise, and restore the historic heritage of Greater Christchurch.

- c) Amend Direction 1.1 on pages 30, 53 and 54 as follows:

~~1.1 Avoid urban development over~~ **Protect** Wāhi Tapu **from urban development**

- d) Insert a new direction and related text at page 54 (after the 'blue box') as follows:

1.3 Protect, recognise, and restore the historic heritage of Greater Christchurch.

Greater Christchurch has many significant heritage sites, areas, and associated values, which should be recognised in urban development and protected from inappropriate activities. In providing this protection there will be tension with the direction for greater intensification and the pressures this may bring on historic heritage sites and areas. The challenge to this will be balancing the protection of historic heritage with providing for greater intensification and a changing urban environment. However, as a matter of national importance under the Resource Management Act 1991, historic heritage values are given greater consideration over intensification.

4.3 Opportunity 2 – Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change

Submissions

The submissions in this section relate to natural hazards and climate change in the following parts of the Spatial Plan:

- Part 1 Areas to protect, avoid and enhance
- Opportunity 2 – Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change
- Direction 2.1 Focus and incentivise growth in areas free from significant risks from natural hazards
- Direction 2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards
- Map 5 – Areas to protect and avoid
- Map 7 – Areas subject to natural hazard risks
- Map 8 – Areas subject to negotiable natural hazard risks

A total of 88 submission points were coded to natural hazards and climate change, including six submission points on the evidence base for natural hazards and climate change. A large proportion of the submissions were in support, or in general support (54), particularly in relation to focusing growth away from natural hazard locations. A total of 29 submission points opposed the natural hazard and climate change provisions, and 5 were neutral.

A total of 16 submitters do not consider climate change exists, or do not consider there is sufficient evidence for climate change. Related to this, several submitters challenge the evidence base on which Maps 7 and Map 8, and by implication Map 5, are based.

As part of the consultative process there were no specific questions asked on the *Have Your Say* submission form in relation to natural hazards and climate change.

Comments made in respect to natural hazards:

- Support the spatial plan but provision for natural hazards and climate change does not go far enough.
- Support managed retreat, including requiring early retreat from flood areas.
- Mitigation is an alternative to retreat.
- Avoid moral hazard and rely instead on insurance.
- Retreat is part of an agenda designed to use fear generated by the climate scam to push people into 15-minute smart neighbourhoods.
- Assumptions in Part 1 (Areas to protect and avoid) relies on Areas to Protect and Avoid Background Report which is based on a contested body of work.
- Term 'avoid' has the potential to be hugely detrimental to communities identified within natural hazard areas to avoid.
- Reducing and managing risk is important.
- Interdependencies between infrastructure need recognition to increase resilience in natural hazard events.
- Strategic infrastructure needs to operate in areas affected by natural hazards, e.g., Port of Lyttelton.
- Locate growth away from more fragile areas (e.g., low lying, coastal and deep liquefaction areas) and strengthen resilience to natural hazards.

- Eastern area – no future; the future of this plan is in moving the city inland.
- The Spatial Plan identifies the coastal suburbs as areas to avoid any development, and is firmly opposed.
- Support for priority area in Eastern Christchurch.
- Denser housing/ high rise is not a good idea in earthquake-prone Christchurch.
- Three storey development is useful for vertical evacuation during tsunamis.
- Earthquakes major concern, as are the bed levels in Waimakariri – question how safe we are from this river.
- Need to quarry the Waimakariri River bed instead of the ‘moat’ system in north-west Christchurch.
- Recognise the role of aggregates in making communities resilient to natural hazards and climate change (e.g., flood protection).
- Include high soil erosion map in GCSP natural hazard maps.
- Support natural coastal wetland and reserves to reduce flood risk.
- Resilience is important for the whole city not just the east.
- GCSP needs to make provision for relocation of tens of thousands of people displaced from coastal and low-lying areas.
- Consider Ōtautahi Christchurch Climate Resilience Strategy in all decision making.
- Promote the 4R’s of reduction, readiness, response and recovery.
- Agree development should not be in areas susceptible to natural hazards but consider risk can be mitigated.
- In formulating the Spatial Plan give attention to the NIWA report on Waimakariri River Sand Budget Stage B.²⁰
- Intensification/high rise may result in flooding and inadequate drainage.
- Priority Development Areas are too restrictive – allow growth in the Port Hills where it is readily absorbed and appropriate.
- Earthquake legacy work should be a priority and future proofed.
- Largest problems we face are climate change and the Alpine Fault.
- Kaiapoi has multiple areas to protect and avoid, but is also recognised as ‘locally important urban centre/town’: this is a dichotomy in terms of where growth is directed.

Comments made in respect to climate change:

- The [climate change] science is not settled and we need to keep abreast of the latest research and be prepared to respond appropriately. Models are simply that and should not be relied upon.
- Challenge to the evidence base for incorporating climate change/sea level rise in technical modelling including use of IPCC’s RCP 8.5 and 8.5+ scenarios.
- Public transport is an important step in reducing carbon emissions.
- Climate scam is being used to push people into 15-minute smart neighbourhood digital ghettos.
- Salt-water intrusion due to rising sea levels is a real concern.
- Support directions 2.1 and 2.2 if based on strong evidential base.
- Planning and infrastructure critical to reduce effects of climate change and protect communities.
- Need reliable renewable energy to achieve a low carbon future for GC.
- Disabled and older population will be hardest hit in climate change, and need to be included in development planning.

²⁰ <https://www.ccc.govt.nz/assets/Documents/Services/Stormwater-drainage/Coastal-Sand-Budget-for-Southern-Pegasus-Bay-Stage-B-Future-Sand-Budget.pdf>

- Planning and infrastructure are critical to reduce effects of climate change and protect communities.
- An adaptive management approach is required as a response to climate change.
- Get rid of the adapt to the impacts of climate change part of the spatial plan.
- Well planned greenfield can deliver climate mitigations.
- How will the Coastal Hazards Adaptation Panel work in this proposal - options for infrastructure and greenspace.
- Climate change is a bourgeois urban myth that should have no place in this plan.
- Waimakariri and Selwyn need MRT to encourage mode shift from private cars.
- No confidence transformational shift in public transport is achievable.
- There is no proof of climate change and sea levels rising, so does not agree with the priority development area for eastern Christchurch.
- New Zealanders are being detrimentally impacted by a Green Agenda.
- Agrees that development around urban centres and transport corridors reduces GHG emissions.
- Next 60 to 100 years, climate change is likely to require an inland migration for Christchurch.
- The impacts of climate change are city wide already, with major flooding events affecting many parts of the city frequently after heavy rain.
- Spatial Plan is idealistic re climate change.
- Reduction in greenhouse gas should not be reliant on MRT but other public transport modes and electric vehicles.
- National Grid will play a critical role in electrification of the economy to reduce GHG emissions.

Response to Submissions

4.3.1 Climate Change

Several submitters did not consider that there was evidence of climate change and/or sea level rise and questioned the inclusion of this as a matter informing the Spatial Plan. Various comments include:

- There is no climate drama, rivers flood every 100 years.
- The fear mongering word 'climate change' is a load of rubbish.
- Where is the proof that climate change exists.
- Do not consider there is proof of climate change and sea levels rising, so do not agree with the priority area for eastern Christchurch.

We note that there are several well-researched scientific papers outlining climate change and its evidence base. We refer these submitters to various climate change documents and websites footnoted below²¹ which provide information on what those scientists consider has occurred through the millennia. This information shows a distinction between previous times of warming and cooling and what is occurring today, in terms of the contribution greenhouse gases are making to global warming.

We further note that there are numerous requirements both regulatory and non-regulatory for the Urban Growth Partnership to take climate change, including sea level rise, into consideration in undertaking their respective responsibilities. These include:

²¹ https://climate.nasa.gov/evidence/#otp_evidence
<https://royalsociety.org/topics-policy/projects/climate-change-evidence-causes/basics-of-climate-change/>

Regulatory

- Resource Management Act 1991– s7; ss61 2(d),(e), 66 2(f),(g) and 74 2(d),(e);
- Local Government Act 2002;
- NZCPS - Objective 5, Policies 24, 25, 26 and 27;
- NPS UD 2020 – Objective 8; Policy 1 and Policy 6;
- Climate Change Response Act 2002.

Non regulatory

- Coastal Hazards and Climate Change: Guidance for Local Government, 2017, Ministry for the Environment;
- Interim Guidance on the use of new sea level rise projections, Ministry for the Environment July 2022;
- National Climate Change Risk Assessment Framework;
- National Adaptation Plan;
- Emissions Reduction Plan.

No specific changes to the Spatial Plan have been requested by the above-mentioned submitters.

Recommendations

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions. We consider that the evidence for, and policy direction to consider climate change impacts is clear. Climate change is a consideration for the draft Spatial Plan, particularly with respect to the long-term direction of future urban growth.

4.3.2 Evidence base for climate change assumptions in modelling used in the Spatial Plan background documents and Maps 7 and 8

Jan Sintes²², South Shore Residents Association²³ and North Beach Residents Association²⁴ expressed firm opposition to the identification of the coastal suburbs as areas to avoid (page 51 and Map 7) and consider this to be ‘simply a concept of managed retreat’. Two of these submitters identified that the IPCC have recently issued a report (IPCC 2020) where they state that the RCP8.5 is ‘implausible’ and an unlikely scenario. While we could not source IPCC 2020, we did find a similar report which makes this statement, see Hausfather and Peters (2020)²⁵.

The North Beach Residents Association²⁶ quotes IPCC AR6. WG1, Chapter 4, section 4.4.2, which the submitter states suggest RCP8.5 and 8.5+ are ‘unlikely and not to be used for policy’. This reference also relies on the Hausfather and Peters (2020) work footnoted below.

One of these submitters also stated that ‘the deliberate withdrawal of development and infrastructure from our coastal area as a primary strategy for addressing coastal challenges poses significant concerns’ which

²² Submitter 261

²³ Submitter 266

²⁴ Submitter 288

²⁵ Hausfather and Peters, 2020 cited in Climate Change 2021: The Physical Science Basis, chapter 4: Future Global Climate: Scenario Based Projections and Near-term Information (2021). Report of the IPCC.

²⁶ Submitter 288

include displacement of communities and economic consequences. Further concern was expressed in respect to an approach to avoid development in coastal areas by way of restrictive planning overlays.

Map 7 includes areas vulnerable to high risk of river flooding, flood ponding, coastal inundation (high and medium), coastal erosion and tsunami inundation (page 51). Map 8 contains 'lower risk' hazards. The modelling undertaken for the Christchurch City coastal inundation areas include climate change and sea level rise assumptions. We understand these scenarios include a sea level rise scenario of 1.2m to 2130, being between the RCP 8.5 and 8.5H+ scenario, and close to or slightly above the SSP5-8.5 scenario²⁷.

However, the technical reports are at a scale in the Spatial Plan that is deliberately broad brush and provide a 'conceptual' spatial extent to assist high level strategic planning. The mapping in the draft Spatial Plan does not identify individual properties, nor does it include restrictive planning overlays, or regulations.

Planning processes at a local level including plan changes to District Plans will include mapping at the property level. Those planning processes will enable robust discussion and testing, including the assumptions about the appropriate RCP/SSP scenarios and amount of sea level rise to be planned for over a 100-year timeframe in any coastal inundation modelling.

In terms of the concern expressed by the submitters above in relation to both the evidence base and identifying the coastal suburbs as areas to avoid (page 51 and Map 7) this is further discussed under the topic – Impact on the East; but is equally applicable to Kaiapoi, which also has high flood hazard areas. In the section 'Impact on the East' we recommend that 'avoid' be amended to 'avoid or mitigate'. This may assist in addressing some of the concerns of these submitters, given the broad nature of the mapping, and the relatively new and untested evidence base in the background technical documents to the draft Spatial Plan, which are still subject to robust district plan change processes.

We note further that the legend to these maps refer to Plan Change 12 (PC12). As discussed above this Plan Change has not yet been notified. The maps are based on technical work by Jacobs and reference to that technical document in the legend is more appropriate in our view. Some additional minor amendments are also included for clarity.

Recommendations

- a) Remove all references to 'PC12' in the legend to Map 7 and Map 8 on pages 58 and 59 and replace with a footnote reference to:
Jacobs (2021). Risk Based Coastal Hazard Analysis for Land-use Planning; Report for Christchurch City Council, September 2021.
- b) Add a reference in the legend to Map 7 and Map 8 on pages 58 and 59 as follows:
Jacobs (2020). Phase 2 Coastal Inundation Modelling Final Study Report; Report for Waimakariri District Council, March 2020.
- c) Amend the reference on Map 7 and Map 8 on page 58 and 59 respectively as follows:
*This map is based on the existing **technical** information and Geographic Information Systems (GIS) data from the four partner Councils. ~~For some constraints, mapping data is unavailable, incomplete or~~*

²⁷ Risk Based Coastal Hazard Analysis for Land Use Planning September 2021 (Jacobs).

~~reliant on emerging policy with legal effect.~~ See 'Areas to protect and avoid **Background Report**' for limitations and further information which is available on the Greater Christchurch Partnership website.

4.3.3 Managed Retreat

Submitters expressed a variety of points of view in relation to managed retreat including:

- Managed retreat should be discussed and provided for in the draft Spatial Plan.
- Early retreat from areas prone to flooding is best option.
- Mitigation is an appropriate alternative to managed retreat.
- Managed retreat is subject to moral hazard and reliance on insurance is required.
- GCSP needs to make provision for relocation of tens of thousands of people displaced from coastal and low-lying areas.
- GCSP points to the coastal suburbs as areas to avoid any development. (Areas to avoid, p51) and is firmly opposed, this is simply a concept of managed retreat.
- Wording in proposal for the east has many worried about managed retreat.

Few submitters made formal suggestions on what should be included in the draft Spatial Plan to resolve their concerns.

Managed retreat is not specifically discussed in the draft Spatial Plan. Opportunity 2 and directions 2.1 and 2.2 more positively focus growth in areas free from significant natural hazard risks and seek to strengthen resilience and reduce and manage risk from natural hazards and climate change.

Policy 25 of the NZCPS 2010 specifically identifies managed retreat as a potential option in addressing the effects of coastal hazards in existing developed areas in extreme circumstances over a 100-year period. At this point in time the draft Spatial Plan does not take a position on it. This is because Partner Councils and entities are currently involved in Coastal Adaptation Engagement with their coastal communities, and local councils are still awaiting more guidance from Central Government, particularly in relation to policy directions and potential funding. The Proposed National Policy Statement for Natural Hazards Decision-making 2023 (NPS-NHD) consultation draft was released on 18 September 2023 and is open for submissions until 13 November 2023. The draft NPS-NHD currently does not address managed retreat. Public submissions to assist the 'Inquiry into Climate Adaptation' close on 12 November 2023.

Some submitters have concerns that while managed retreat is not specifically mentioned, some of the proposals in the draft Spatial Plan appear to take a managed retreat approach. In our opinion this is not the case. While discussed in more detail below under the section 'Impact on Eastern Christchurch', the purpose of the draft Spatial Plan is to identify and incentivise urban intensification and greenfield growth where appropriate. There are no proposals or approaches in the draft Spatial Plan that would have the impact of directing 'down-zoning' or reducing the development potential that currently exists in low lying and coastal areas, or require removing/relocating assets altogether.

Overall, we consider it would be appropriate to include the coastal adaptation work and its purpose as an additional point under 'Related planning processes currently underway' on page 25. This would clarify that while managed retreat is not part of this GCSP, it will form part of conversations with communities as one potential option in the coastal adaptation toolbox.

Recommendations:

- a) Add a new bullet point after the last bullet point on page 25 as follows:

The Christchurch City Council is undertaking a Coastal Hazards Adaptation Framework with its coastal communities to create adaptive pathways to respond to coastal hazard risks. It is anticipated that this work will inform future changes to the District Plan. It is also anticipated that a new law ‘the Climate Adaptation Act’ will assist in responding to complex legal and technical issues associated with managed retreat when it is enacted.

4.3.4 Impact on Eastern Christchurch

Many submitters were concerned about the impact of the ‘avoid’ direction in Part A, Opportunity 2, associated directions 2.1 and 2.2 and natural hazard mapping, on Eastern Christchurch. Further concerns were expressed that the draft Spatial Plan identifies the east as a priority area, rather than a priority development area. The concern is that Eastern Christchurch would not be provided with the ‘targeted intensification’ and ‘co-ordinated and aligned action across multiple agencies; to inform, prioritise and unlock investment...’ (page 70) that is to be afforded to Priority Development Areas. Instead, the draft Spatial Plan references a Partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience” (page 43). Other submitters opposing the eastern priority area do not support the evidence base for climate change and sea level rise and therefore consider the approach inappropriate. The issue of the evidence base for climate change has been discussed above.

Given that the officers agree that there is a need for the Greater Christchurch Partnership to take climate change into consideration, we generally agree with the approach to identify ‘eastern’ Christchurch differently from Priority Development Areas. It is important to emphasise two points in terms of this support:

- The spatial extent of what constitutes ‘the Eastern Priority Area’ is intentionally not specifically defined. It is subject to further work, clarification and engagement.
- Whilst ‘greater intensification’ is not a focus for some eastern neighbourhoods, development opportunities are provided for under the current operative district plan.

Further responses regarding Eastern Christchurch as a Priority Area are provided in section 4.9 Priority Development Areas.

In terms of the ‘avoid’ direction and its impact on the east our preference is to amend ‘avoid’ to ‘avoid or mitigate’. This is particularly appropriate in terms of some areas subject to natural hazards where mitigation can adequately address the risk, and will be the case in parts of eastern Christchurch. It is considered that the direction to ‘avoid or mitigate’ does not prevent an avoidance outcome if that is the appropriate response in a district plan, for example, but provides the opportunity for development to occur where appropriate measures are available (or become available through changes in technology) to reduce risk to acceptable levels. Some changes to the text in Part 1, page 51 and Opportunity 2 are required to reflect this.

Officers also consider the use of the word ‘negotiable’ is inconsistent with accepted natural hazard terminology and is ambiguous; implying that the constraints or risks identified in Map 8 are ‘negotiable’. We have recommended that this be replaced with ‘moderate’ which is more consistent with natural hazard

terminology and is also consistent with the recently released terminology in the NPS-NHD (draft for consultation).

Recommendations:

- a) Amend the second sentence on page 51 as follows:

This includes identifying areas to protect given their intrinsic values and importance, such as sites and areas of significance to Māori, and areas with significant natural features or landscapes; and areas to avoid given they are subject to natural hazards, **noting in some circumstances mitigation may also be appropriate.**

- b) Amend the heading 'Areas to avoid' in the blue box on page 51 to 'Areas to avoid or mitigate' as follows:

Areas to avoid **or mitigate**

- c) Amend the first sentence in the second paragraph on page 51 as follows:

The methodology and reasoning for identifying the areas to protect and avoid, **or potentially mitigate,** is set out in the Areas to Protect and Avoid Background Report. The sites...

- d) Amend the first sentence of the third paragraph on page 51 as follows:

Layering all the areas to protect and avoid **or mitigate** on top of each other highlights the most constrained areas of Greater Christchurch for development (see Map 5). These areas...

- e) Amend the second sentence of paragraph 4 as follows:

It is acknowledged that for flood hazard areas, the map shows differing return periods as the basis for areas to avoid, **or mitigate,** based on the best available mapping information from each territorial authority.

- f) Amend the title of Map 5 from 'Areas to protect and avoid' to 'Key constraint areas' as follows:

Map 5: ~~Areas to protect and avoid~~ **Key constraint areas**

- g) Amend the legend to Map 5 by deleting reference to 'Areas to Protect and Avoid' and replacing with 'Key constraint areas'.

- h) Amend the 3rd paragraph under direction 2.1 (page 57) as follows:

It is essential that urban development is directed away from areas that are at significant risk from natural hazards **where that risk cannot be reduced to acceptable levels,** to ensure the safety and wellbeing of people, and the protection of buildings, infrastructure and assets.

- i) Amend the 4th paragraph under direction 2.1 (page 57) as follows:

There are also some areas subject to natural hazards, but where these risks can be **more easily** mitigated by building differently, such as increasing the floor levels of a building or ensuring building foundations meet a higher standard. These areas are categorised as having ~~negotiable~~ **moderate** constraints (see Map 8).

- j) Amend the title of Map 8 to be consistent with the recommended text changes as follows:

Map 8: Areas subject to ~~negotiable~~ **moderate** natural hazard risks

4.3.5 Renewable energy and reducing carbon emissions

Christchurch International Airport (CIAL)²⁸ is identified as a lifeline utility in CDEM 2002. It has been developing Kowhai Park as its own on-site renewable energy project. CIAL supports direction 2.2 in respect to increasing resilience to natural hazards and climate change. Its submission seeks additional words be added to the Introduction to reference both infrastructure and climate change and express that there is a need for reliable, renewable energy to achieve a low carbon future for Greater Christchurch.

We note that the introduction already includes reference to climate change, but agree that there is no explicit reference to renewable energy to achieve a low carbon future. Consequently, we agree that some additional words in respect to renewable energy will be helpful but under Opportunity 2 and Opportunity 5 rather than the Introduction.

Recommendations:

- a) Amend the last bullet point under Context on page 56 as follows:

In a global context, greenhouse gas emissions on a per capita basis are extremely high in Greater Christchurch. An emissions inventory for Christchurch City for the 2018/19 financial year showed that more than half of its total emissions came from the transport sector. **It is acknowledged that achieving a low carbon future for Greater Christchurch will require the provision of reliable renewable energy.**

- b) Amend the 5th bullet point under 'Current and planned state of strategic infrastructure networks' on page 81 as follows:

Growth in the use of electricity for transport will necessitate greater provision of electric charging networks in Greater Christchurch. This is expected to be provided by the private sector. Over time, there may be a requirement for greater local generation of green energy. **The provision of reliable renewable energy will be important for achieving a low carbon future for Greater Christchurch.**

4.3.6 Climate Change and the National Grid

Transpower²⁹ made a substantial submission to the draft Spatial Plan. It submits that the National Grid will play a critical role in electrification of the economy to reduce GHG emissions. Transpower seeks additional wording to reflect the significance of the national grid in achieving climate change mitigation objectives as follows:

²⁸ Submitter 218

²⁹ Submitter 325

Page 81 after the second to last bullet point add a new bullet point:

“In light of the role that the National Grid plays in electrification of the economy, the National Grid will need to be protected from inappropriate subdivision, land use and development and the partnership will work with Transpower to facilitate long-term planning for the maintenance, operation, upgrading and development of the National Grid. While existing National Grid assets are identified on the Spatial Plan maps, it is anticipated that in the life of the Spatial Plan, new assets will be needed, particularly to connect to new generation.”

Officers consider it appropriate to add a clause in respect to the importance of the national grid in electrification of the economy to reduce GHG emissions, which in turn impacts future growth of Greater Christchurch. Our recommended wording is provided below.

Recommendations

- a) Add the following text after the second to last bullet point on page 81 as follows:

The National Grid will continue to play an important role in electrification of the economy and will need to be protected. Long-term planning for the maintenance, operation, upgrading and development of the National Grid needs to be facilitated and supported. While existing National Grid assets are identified on the Spatial Plan maps, new development will necessitate new assets, particularly to connect to new generation.

4.3.7 Role of infrastructure during natural hazard events

Spark, Chorus, One NZ, FortySouth and Connexa³⁰ jointly consider that Opportunity 2 fails to recognise the impact that disruption to telecommunications could have during an extreme natural hazard event, such as the recent Cyclone Gabrielle. Their submission highlights the interdependencies between critical infrastructure and the flow-on impacts that outages can have on other sectors. Their submission states that it is also essential that growth areas have telecommunications infrastructure – both wireless and fixed line.

While there is an infrastructure section in the draft Spatial Plan, we agree that recognising the role of critical infrastructure in responding to and recovery from natural hazard events is part of an overall strategy to improve resilience to climate change and natural hazards. We recommend including an additional bullet point to the explanation to Opportunity 2, direction 2.

Port of Lyttelton³¹ support the identification of areas to protect and avoid including in relation to strategic infrastructure. They have requested that the Spatial Plan recognises that strategic infrastructure often needs to operate in areas affected by natural hazards. Officers agree that it is appropriate to acknowledge that strategic infrastructure sometimes needs to operate in areas affected by natural hazards and have recommended an amendment below.

Recommendations:

- a) Add a new bullet point after the first bullet point to direction 2.2 on page 57 as follows:

Key ways to build resilience to climate change and natural hazards in Greater Christchurch include:

- Reducing transport...

³⁰ Submitter 222

³¹ Submitter 345

- **Recognising interdependencies in the infrastructure sector, especially between telecommunications and electricity, and acknowledging the role they play in responding to, and recovering from, natural hazard events.**

b) Add to the second bullet point in direction 2.2 on page 57 as follows:

- Focusing growth away from areas likely to be more exposed to natural hazards that will be exacerbated by climate change, such as flooding and coastal erosion, **while acknowledging that strategic infrastructure sometimes needs to operate in areas affected by natural hazards.**

4.3.8 Map High Soil Erosion – Loess on the Port Hills

Ōpāwaho Heathcote River Network³² submit that the natural hazards mapping in the draft Spatial Plan ‘is missing identification of High Soil Erosion Risk’, which they consider is not the same as slope hazard. Their submission considers that erosion of loess soil from the Port Hills is the greatest current contaminant of the Ōpāwaho Heathcote River and that controlling, preventing or minimising developments on the Port Hills must be an essential part of any plan to reduce the level of erosion.

The natural hazard mapping in the draft Spatial Plan focuses on the impact of hazards on human life and property, such that it would lead to a constraint on urban growth and development. The main adverse effects from erosion of loess soils on the Port Hills, as stated by the submitter, is sediment loads contaminating the Ōpāwaho Heathcote River, which is primarily a water quality issue. Although, we note that it can also cause tunnel gullyng and be a potential natural hazard and development constraint if undermining (tunnel gullyng) leads to slope failure on developed sites. We note that the ‘Remainder of the Port Hills’ not identified as mass movement, rockfall or cliff collapse areas are identified for ‘slope hazard’ (Map 8), and the loess soils in conjunction with steeper slopes may be part of the reason for this categorisation. The Christchurch City Council is also investigating an earthworks plan change to its district plan that is reviewing provisions for managing the effects of soil erosion risk.

Overall, given that loess soils cover most of the Port Hills and are a constraint which require engineering geologist/ geotechnical input for subdivision and building consent on a site-specific basis, we do not consider it necessary to map these areas as a natural hazard at the level of the draft Spatial Plan. High Soil Erosion Risk Areas are mapped in the Canterbury Land and Water Regional Plan (see below) and have a policy and rule framework to address this hazard including rules relating to setbacks from waterways, earthworks and discharges.

³² Submitter 360

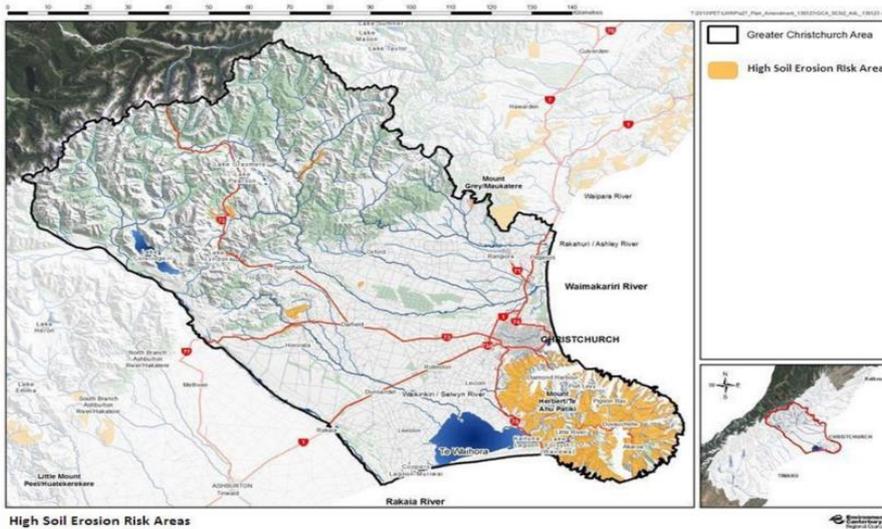


Figure 4: High Soil Erosion Risk Areas. Source: Canterbury Land and Water Regional Plan

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

4.3.9 Development on the Port Hills

The Tapper Family Trust³³ seeks recognition within the draft Spatial Plan for growth and intensification on the Port Hills ‘in pockets’ in areas surrounded by existing development, below ridgelines, where such growth could be readily absorbed. Its submission seeks specific changes at page 51 of the draft Spatial Plan as follows:

Layering all the areas to protect and avoid on top of each other highlights the most constrained areas of Greater Christchurch for development (see Map 5). These areas generally include the eastern areas along the coastline, the Port Hills and Te Pataka a Rakaihautu / Banks Peninsula, the areas to the north-west of Christchurch, and the areas i8oio67yt5and man-made factors. The presence of Wahi Tapu, Wahi Taonga and Nga Wai are also matters of further significance, where any urban encroachment will require engagement with and consideration by mana whenua. In noting the above there may be pockets of landholdings within the Port Hills that are appropriate for development and that may be readily absorbed within the environment. In particular infilling and intensification of parts of the Port Hills may occur where considered appropriate.

Overall, we do not consider the proposed amendment above appropriate given the purpose of that section is to highlight the most constrained areas shown in the ‘heat map’ on page 52. However, it may be appropriate to include a small amendment on page 57 to recognise that parts of the Port Hills are neither subject to rock fall, mass movement, cliff collapse, nor fall within protected places, landscapes and features, and that these areas have traditionally been considered appropriate and/or safe to build on with appropriate geotechnical consideration.

Recommendations:

³³ Submitter 330

- a) Amend the last paragraph to Direction 2.1 on page 57 as follows:

There are also some areas subject to natural hazards, but where these risks can be **more easily**³⁴ mitigated by building differently, such as increasing the floor levels of a building or ensuring building foundations meet a higher standard. These areas, **which include parts of the Port Hills and large areas of the floodplains**, are categorised as having negotiable **moderate**³⁵ constraints (see Map 8).

4.3.10 Tsunami mapping error – Maps 7 and 8

Incorrect mapping was inserted in Maps 7 and 8. In both cases the mapping should include tsunami inundation extents rather than tsunami evacuation areas; noting that evacuation zones include logistic and communication factors in determining the extent. Correct mapping has now been provided, modelled by GNS in 2019/2020, which shows a 1:100-200-year inundation by a 3m wave for Pegasus Bay and Lyttelton (~1:200-400 years for Selwyn) as the high tsunami hazard and ~1:800-year inundation (5 m wave) for Pegasus Bay and Lyttelton Harbour (~1:1700 years for Selwyn) for the moderate to low-risk area. At the scale of the maps for the draft Spatial Plan these changes will be barely noticeable and are coupled with other coastal inundation hazards.

The legend in Map 7 needs to be amended to remove reference to the word 'red' next to 'Tsunami Inundation' as this is a reference to the red Tsunami Evacuation Area, and replaced with 'High'. In Map 8 legend the reference to 'Tsunami Evacuation Zone (orange)' should be replaced with 'Tsunami Inundation (Moderate-Low)'.

Recommendations:

- a) Amend the tsunami layer underlying Map 7 on page 58 as follows:

Remove the red tsunami evacuation map layer and replace with the tsunami inundation 3m wave map layer (~1: 100-200 from 2019/2020 GNS modelling) and amend the legend on the map to refer to Tsunami Inundation – High.

- b) Amend the tsunami layer in Map 8 on page 59 as follows:

Remove the orange tsunami evacuation map layer and replace with tsunami inundation 5m wave map layer (~1:800 from 2019/2020 GNS modelling) and amend the legend on the map to refer to Tsunami Inundation – Moderate-Low.

³⁴ From recommendation for 4.3.4 - Impact on Eastern Christchurch

³⁵ From recommendation for 4.3.4 - Impact on Eastern Christchurch

4.4 Opportunity 3 – Protect, restore and enhance the natural environment with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people

Submissions

The *Have Your Say* submission form included two questions that sought feedback directly relevant to Opportunity 3, the associated Directions, and the Key Move supporting an enhanced and expanded blue-green network.

Seventy-four per cent of the 281 submitters who responded to question 3a in the online *Have Your Say* submission form³⁶ stated that they support the proposed strategy to maintain and enhance the natural environment within urban areas. Seventeen per cent indicated they did not support the proposed strategy, and 9 per cent were unsure.

Table 6 – Response to ‘Have Your Say’ Question Q.3a – Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Position	Number of Responses	% of Total Responses
Support	208	74.02%
Opposed	47	16.73%
Unsure	26	9.25%

Just over 66 per cent of 282 submitters who responded to question 3b in the online *Have Your Say* form³⁷ stated that they support the concept of a greenbelt around urban areas. Twenty-two per cent indicated they did not support the concept, and 12 per cent were unsure.

Table 7 – Response to ‘Have Your Say’ Question Q3 – Do you support the concept of a Greenbelt around our urban areas?

Position	Number of Responses	% of Total Responses
Support	187	66.31%
Opposed	62	21.99%
Unsure	33	11.70%

Additionally, submissions on aspects of Opportunity 3 were also received from submitters that did not use the *Have Your Say* submission form.

Relevant submission points have been grouped under key themes in the sub-sections below.

³⁶ Have Your Say Survey question 3a – ‘Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?’

³⁷ Have Your Say survey Q3b – ‘Do you support the concept of a Greenbelt around our urban areas?’

4.4.1 General comments on the proposed strategy to maintain and enhance the natural environment

Overview of submissions

General comments in support of the proposed strategy referred to the importance of the natural environment in urban areas for physical and mental health and wellbeing, amenity, environmental health and biodiversity (in particular birdlife), and social connection. The importance of enhancing the natural environment to help to address or mitigate climate change was also identified by submitters. One submitter suggested that the Spatial Plan should promote the concept of a “sponge city”.³⁸

Several submitters referred to the need to protect or enhance the environment as part of supporting high quality intensification and the expansion of Greater Christchurch.³⁹

A wide range of comments were received from submitters who did not support the approach to maintaining and enhancing the natural environment. Examples include –

- further environmental protection and enhancement measures and / or additional greenspaces are unnecessary
- trees can damage infrastructure
- the proposal represents a ‘predetermined agenda’
- freedom of choice is being removed
- waterways would be healthy if chlorine and/or other chemicals were removed
- a preference for private gardens over shared greenspaces
- that the Spatial Plan will not deliver the environmental outcomes sought.

Some submitters referred to the need for any proposal to protect, maintain and enhance the natural environment to be based on a sound evidential basis and site-specific characteristics.⁴⁰

Response to submissions

An enhanced and expanded blue-green network is one of the five Key Moves identified through the draft Spatial Plan as being fundamental to achieving the desired future and to support inter-generational wellbeing. The blue-green network principles on page 46 of the draft Spatial Plan provide a framework to guide further work to achieve the objectives of regenerating the natural environment and strengthening climate resilience, which will be embedded into the work of the partnership and individual partners. This work includes the development of an integrated blue-green network strategy, which is identified in the Joint Work Programme of the draft Spatial Plan.⁴¹

We do not consider that specific changes are required in response to the general submission points received. However, we consider that many of these comments, and those summarised under relevant sub-sections below, could usefully inform the development of the blue-green network strategy identified in the Joint Work

³⁸ Submitter 360

³⁹ For example, Submitters 57, 64, 277

⁴⁰ For example, Submitters 339, 340, 362

⁴¹ Joint Work Programme (Draft GCSP page 90): Blue-Green Network Strategy (including Green Belt Concept) – To develop an integrated blue-green network strategy reflecting the blue-green network principles and environmental directions.

Programme. These comments have been collated and categorised, and officers suggest it would be appropriate to consider these further in developing the blue-green network strategy.

Several submitters⁴² sought changes to Direction 3.1, with some citing inconsistency with the RMA or national direction which they consider does not require the ‘avoidance’ of development or absolute protection of areas with environmental values. Submitters also sought the removal of some areas from Map 10. Other submitters supported this Direction.⁴³

In response to these submissions, we recommend that the Direction is amended to ‘Protect areas with significant natural values’. We note that the text under Direction 3.1 refers to focussing development away from areas with significant natural values and areas of cultural significance, and that development is either avoided in these areas or involves early engagement and agreement with mana whenua. The text on page 51 of the draft Spatial Plan identifies sites and areas of significance to Māori and environmental areas and features as areas to protect. We do not consider this high-level direction to be inconsistent with national direction, nor would it prevent a nuanced and effects-based approach being taken by councils in regional and district plans.

Some submitters commented on the relative priority that should be given to Opportunity 3 compared with the other opportunities set out in the draft Spatial Plan.⁴⁴ As set out in Section 4.1.1 of this report, the intent of the Spatial Plan is that there is no hierarchy between the Opportunities. Other submitters referred to the need for a strong and effective commitment from partners to implement and fund the improvements and opportunities identified in the draft Spatial Plan.⁴⁵ We note that the draft Spatial Plan (page 46) sets out the ways in which the blue-green network principles will be embedded into the work of the partnership and individual partners, and the commitment to develop an integrated blue-green network strategy.

Recommendations:

- a) Amend Direction 3.1 (pages 30, 61 and 63) as follows:

*3.1 ~~Avoid development in~~ **Protect** areas with significant natural values*

Te ao Māori acknowledges the interconnectedness of people and te taiao – the environment. Based on this Māori world view, kaitiakitanga is a way of managing the environment that recognises that people are an integral part of the natural world, not separate from it; and that there is an intergenerational duty to **protect**, restore and enhance the mauri (life force) of water, land and ecosystems.

4.4.2 Health and wellbeing of waterbodies

Overview of submissions

Most submissions which raised points related to the health and wellbeing of waterbodies appeared generally supportive of the direction in the Spatial Plan.

⁴² Including, Submitters 171, 314, 330

⁴³ For example, Submitters 295, 340

⁴⁴ Including, Submitters 159, 165, 368

⁴⁵ Including, Submitters 202, 360

Specific points included:

- support for the protection and restoration of waterways and/or wetlands⁴⁶
- support for giving rivers and wetlands ‘space’, including to help manage flooding⁴⁷
- the need to address pollution in urban rivers⁴⁸
- recognition of the importance of water, and that the integration between urban development and water quality and quantity is fundamental to the future of the sub-region⁴⁹
- the need to protect the aquifers and waterbodies that feed them⁵⁰; and the need to consider ‘downstream’ waterway health when creating ‘upstream’ projects⁵¹
- support for a catchment (or ki uta ki tai – ‘mountains to the sea’) approach.⁵²

Two submitters that did not support the approach to maintain and enhance the natural environment commented that waterways are already protected or improving,⁵³ while others objected to the chlorination and fluoridation of water.⁵⁴

Submitters also commented that residential intensification, and an increased population, could negatively impact waterways.⁵⁵

One submitter did not support the establishment of additional wetlands.⁵⁶

Response to submissions

Summerset Group Holdings Limited⁵⁷ submits that the reference to the protection of the groundwater protection zone under Direction 3.2 is a ‘blunt statement’ which does not acknowledge the mechanisms and instruments available to prevent contamination of groundwater.

Within the groundwater protection zone, there is high risk of groundwater contamination,⁵⁸ and land uses and activities that could compromise drinking water supplies are regulated. Rules in the Canterbury Land and Water Regional Plan control land use in the areas north and west of Christchurch City, to minimise the risk of contamination. Officers consider that the draft Spatial Plan appropriately recognises the need to protect this essential drinking water source at a strategic level.

The Ōpāwaho Heathcote River Network⁵⁹ notes in its submission that throughout the Spatial Plan the term ‘waterbodies’ is used to cover all types of geographical features containing water and submits that the Spatial

⁴⁶ For example, Submitters 7, 80, 156, 148, 163, 226, 260, 264,

⁴⁷ For example, Submitters 7, 55, 87, 297, 360

⁴⁸ Submitter 134, 227

⁴⁹ Submitter 310

⁵⁰ Submitter 226

⁵¹ Submitter 363

⁵² Submitter 227, 310

⁵³ Submitter 200, 298

⁵⁴ Submitters 154, 244, 169

⁵⁵ Submitter 198, 253

⁵⁶ Submitter 271

⁵⁷ Submitter 171

⁵⁸ Within this area, groundwater is very close to the land surface and overlying soil and gravel is permeable, meaning that nearly everything is able to pass through it easily.

⁵⁹ Submitter 360

Plan should refer to “waterbodies including wetlands”, to ensure wetlands receive the same priority as other water features.

We consider that it is sufficiently clear that ‘waterbodies’, used as a general term within the draft Spatial Plan, includes wetlands. Both the definition of ‘blue-green network’ on page 10 and the description on page 45 refer to wetlands as part of the ‘blue’ elements of the network. The description of Ngā Wai similarly refers to waterbodies and their margins, which include ngā repo / wetlands (page 9). However, for the avoidance of doubt, a change to the text under Direction 3.2 has been recommended.

One submitter⁶⁰ commented that management of the natural environment should include protecting the sea as well as waterways and suggests a ‘Bluebelt’ around ocean coastlines, including marine reserves and careful placement of offshore wind farms. We note that the boundary of Greater Christchurch for the purposes of the Spatial Plan is the landward extent of the coast. However, the coast and coastal water quality are referred to in the draft Spatial Plan, with references to the blue-green network including coastal areas and coastal waters (Key Terms and page 45), and Direction 3.2 Prioritise the health and wellbeing of water bodies (page 63). Officers recommend coastal waters / the sea be shown for context on Map 10. This also responds to a submission which commented that the status of Lyttelton Harbour is unclear from Map 10.⁶¹

In response to multiple submissions which emphasised and supported the prioritisation, protection and restoration of waterways and wetlands, we recommend an additional Principle be added to page 45, which relates specifically to healthy waterbodies.

Recommendations:

- a) Insert new blue-green network Principle (page 45) as follows:

Healthy waterbodies: Valuing, respecting, and prioritising the health and wellbeing of waterbodies, recognising the vital importance of water.

- b) Amend the text under Direction 3.2 (page 63) as follows:

Direction 3.2 Prioritise the health and wellbeing of water bodies

Restoring the health and wellbeing of water bodies, **including wetlands**, is a priority for the city region.

- c) Amend Map 10 (page 62) to show the sea / coastal water in blue.

4.4.3 Provision for greenspace (including trees and biodiversity)

Overview of submissions

Many submitters referred to benefits or uses of greenspace and trees through their submissions, including:

- physical and mental health
- sport, play and recreation

⁶⁰ Submitter 175

⁶¹ Submitter 127

- ambience and amenity
- connection / sense of community / place making
- protection / reduced contamination of waterways
- mitigating urban temperatures
- improved routes for active transport
- improved biodiversity, ecological connectivity
- improved air quality
- carbon sequestration

Submitters made specific suggestions relevant to the enhancement and expansion of the network of greenspaces. These included support for:

- larger greenspaces (“to support life, not just fitting things into margins and corners”)⁶²
- green space / pocket parks / play spaces within subdivisions and developments throughout urban areas⁶³
- food forests, orchards and community gardens⁶⁴
- green areas along the public transport system⁶⁵
- trees / increasing tree canopy cover (including roadside trees, tree-lined streets)⁶⁶
- native flora / plantings, including street trees⁶⁷
- urban forests⁶⁸
- the need to ensure walking tracks, walkways, parks and waterways are fully accessible to accommodate the widest range of users (including disabled people and double buggies)⁶⁹

Many of the submissions from groups of youth⁷⁰ identified specific parks and greenspaces across the sub-region that are valued and should be protected. These submissions emphasised the importance of greenspace to youth for sport and other forms of recreation, bringing people together, and being areas of significance to Māori. One submission supported additional parks and greenspace and the introduction of nature in Central City locations such as Riccarton Mall and surrounding streets, and suggested prioritising a percentage of the city being filled with trees when the city continues to be urbanised.⁷¹

A large number of submitters referred to the potential of the ‘red zones’⁷² to provide enhanced / additional urban greenspace, environmental, recreational and other benefits (e.g. buffer against flooding, mahinga kai, community gardens, orchards).⁷³

⁶² Submitter 151

⁶³ Submitters 187, 199, 227, 247, 289

⁶⁴ Including, Submitters 66, 76, 117,

⁶⁵ Submitter 281

⁶⁶ Submitters 7, 87, 167, 187, 227, 279, 303, 363

⁶⁷ Submitters 21, 80, 87, 93, 151, 164, 166

⁶⁸ Submitters 93, 164, 166

⁶⁹ Submitters 133, 302

⁷⁰ Including, Submitters 160, 165, 167, 168, 188, 189

⁷¹ Submitter 167

⁷² The residential red zone is an area that experienced severe land damage following the Canterbury earthquake sequence of 2010–2011, which the Government categorised as ‘red’ for the purposes of making a Crown offer to buy the land.

⁷³ For example, Submitters 96, 99, 109, 151, 156, 163, 195, 205, 216, 226, 227, 264, 350

Some submitters that stated they did not support the proposed strategy to maintain and enhance the natural environment referred to there already being many / enough parks and green spaces⁷⁴, that it is safer for families to have a backyard than shared greenspace⁷⁵, and that trees cause damage to infrastructure.⁷⁶

Response to submissions

The submission by the Environment Canterbury Youth Rōpū⁷⁷ seeks clarification regarding how, if at all, the red zone will be prioritised for environmental and recreational development. Officers note that the Ōtākaro Avon River Corridor Regeneration Plan (August 2019) sets out the vision and detailed proposals for the future of the Ōtākaro Avon River Corridor. Similarly, the Waimakariri Residential Red Zone Recovery Plan (December 2016) sets out the agreed long-term uses for the five regeneration areas. The proposals within both Plans include significant green space and recreation uses and will be key components of the future blue-green network in Christchurch City and Kaiapoi. Detailed information regarding the plans for the Ōtākaro Avon River Corridor regeneration area and Waimakariri Residential Red Zone Recovery Plan is available on the Christchurch City Council and Waimakariri District Council websites.

Some submitters referred to the importance of high-quality shared greenspace and parks within intensification areas, and as residential densities increase.⁷⁸ Submissions also highlighted the need to ensure that provision for greenspace and tree canopy, and blue-green network enhancement opportunities, are identified / prioritised in existing areas as well as in new development areas, including neighbourhoods currently experiencing significant intensification.⁷⁹ The text under Direction 3.2 in the draft Spatial Plan states that 'improving the quality of the environment in higher density areas is critical'. In response to these submission points, officers recommend this wording is amended to refer to both existing and proposed higher density areas.

The submission by the Disabled Persons Assembly (NZ) Inc⁸⁰ seeks that access to Greater Christchurch's present and future natural areas be supported through the construction and/or upgrading of facilities to Universal Design standards. The importance of accessibility is also highlighted by Multiples Canterbury.⁸¹ We agree that it is important that greenspace within our urban environments can be enjoyed by people of all ages and abilities and have recommended some additional wording to this effect.

One submitter⁸² noted that a 100 hectare District Park is proposed at the corner of Levi Road and Weedons Road in Rolleston (signalled in the Rolleston Structure Plan), and suggests that this could be added to Map 2. Officers understand that the land is currently zoned General Rural. Without further certainty around the timing of the District Park proposal, a change to Map 10 is not recommended.

Recommendations:

- a) Amend text under Direction 3.3 (page 64) as follows:

⁷⁴ Submitters 157, 232

⁷⁵ Submitters 276, 293

⁷⁶ Submitters 5, 105

⁷⁷ Submitter 264

⁷⁸ Submitters 14, 28, 74, 102, 234, 277

⁷⁹ Submitter 360, Ōpāwaho Heathcote River Network Submitter 303, Waihoru Spreydon-Cashmere-Heathcote Community Board

⁸⁰ Submitter 303

⁸¹ Submitter 133

⁸² Submitter 199

New para. 4:

It is important that green spaces within our urban environments can be enjoyed by people of all ages and abilities, including through inclusive design and the application of universal design standards.

b) Amend the last paragraph under Direction 3.3 (page 64) as follows:

Improving the quality of the environment in **existing and proposed** higher density areas is critical.

4.4.4 Protection of highly productive land

Overview of submissions

Thirty-four submission points were coded as relevant to the topic of highly productive land.

Submitters referred to the environmental damage and climate change implications of continued urban expansion onto horticultural and agricultural land, the desire to provide space for farming and ecosystems / habitats, and the need to protect rural land / farmland / land for growing food.⁸³ Related submission points referred to the positive impact intensification and higher densities can have in reducing the expansion of urban areas or urban sprawl onto productive soils, land suitable for growing food, arable land and farmland.⁸⁴

The submission from NZ Pork⁸⁵ referred to the impact of the loss of good quality soils in terms of both the cost and the environmental footprint of farming, due to the need for more inputs, such as fertiliser and irrigation water, to obtain the same level of production on lower quality soils.

Some submitters identified the loss of productive land that has already occurred within and around urban centres (including Marshlands, the former Applefields site and others in Belfast), and the need to protect what remains.⁸⁶ Others referred to the difficulty in protecting highly productive land from development,⁸⁷ in some cases highlighting specific plan changes.

Comments from submitters that (either explicitly or implicitly) did not support the proposed approach to protecting highly productive land included:

- that Direction 3.4, in conjunction with the greenbelt concept, will significantly restrict land development outside current urban boundaries⁸⁸
- the need to provide housing / prepare for population growth⁸⁹
- the availability of productive soils in other locations⁹⁰
- that 'spreading out' will enable more green spaces to be provided⁹¹

⁸³ For example, Submitters 51, 184, 226, 227, 275

⁸⁴ For example, Submitters 69, 73, 74, 75

⁸⁵ Submitter 342

⁸⁶ Submitters 226, 227, 294

⁸⁷ Submitters 136, 293, 294

⁸⁸ Submitter 171

⁸⁹ Submitter 37, 47

⁹⁰ Submitter 47

⁹¹ Submitter 37

- area-specific constraints, such as a lack of available irrigation in over-allocated catchments which prevents land from being utilised for productive purposes.⁹²

Several submitters made similar points as follows:

- that the land adjoining the existing urban areas in Greater Christchurch is already fragmented into 4 ha or rural lifestyle blocks which are too small to be highly productive⁹³ and/or
- that the loss of highly productive land is not a significant issue in the context of urban growth scenarios for Greater Christchurch and the spatial plan discussion / direction regarding highly productive land needs to be amended accordingly.⁹⁴

Some submitters⁹⁵ consider that the classification of soils under the Land Use Capability Classes 1,2,3 is too simplistic, and sought that other factors that affect the productivity of soil, such as the ability to irrigate, the location of the land, fragmentation, and versatility of soils should be considered when applying the National Policy Statement for Highly Productive Land (NPS-HPL).

Response to submissions

The draft Spatial Plan (Direction 3.4, page 65) recognises that highly productive land is a scarce and finite resource that has been lost to urban expansion and land fragmentation. The approach reflected in the Spatial Plan is to focus future urban development within the existing urban area, to help protect the best soils for agriculture. Where development does need to occur outside the existing urban area, this should avoid highly productive land where possible. Officers consider this approach is appropriate in the context of the objective and policies in the NPS-HPL.

Christchurch International Airport Limited⁹⁶ submits that Map 12 should reflect the status of land under the NPS-HPL (for example, land that is not zoned Rural or Rural Production should not be included in the mapping).

Officers note that the Areas to Avoid and Protect Background Report (February 2023)⁹⁷ confirms the mapping of Land Use Capability (LUC) Class 1, 2, and 3 soils⁹⁸ has not excluded parts of the existing urban area, land identified for future urban development, or land that is subject to council initiated or notified plan changes. Map 12 shows the extent of soils in Greater Christchurch that are classified as LUC Class 1-3 soils; this is confirmed by the title and legend on Map 12, and the text under Direction 3.4.

On this basis, we consider that Map 12 is not intended to represent highly productive land as per the interim definition in the NPS-HPL (NPS-HPL clause 3.5 (7)). For clarity, we recommend the title of Map 12 is amended to reflect that LUC Class 1-3 soils have been mapped.

The NPS-HPL requires regional councils to notify in a proposed regional policy statement all the land in its region that is required to be mapped as highly productive land (ref. clause 3.5 (1)).

⁹² Submitter 315 (this submission point relates to a specific site in West Melton)

⁹³ Submitters 147, 308, 310, 315, 318, 320

⁹⁴ Submitters 308, 310, 315, 318, 320

⁹⁵ Submitters 241, 310, 327

⁹⁶ Submitter 218

⁹⁷ [Areas-to-Avoid-and-Protect-Report_FINAL-v2.pdf \(greaterchristchurch.org.nz\)](#)

⁹⁸ As mapped by Manaaki Whenua Landcare Research (Canterbury Maps)

We understand that the Canterbury Regional Council is currently progressing the mapping of highly productive land as required by the NPS-HPL. This is being undertaken as part of the review of the Canterbury Regional Policy Statement, to be notified in December 2024. The exclusion or otherwise of blocks of land of a particular parcel size or zoning (and other factors identified in the NPS-HPL) will be a matter for the Canterbury Regional Council to consider through this process.

As required by the NPS-HPL, the territorial authorities will be required to apply the interim definition until the mapping of highly productive land in the Canterbury Regional Policy Statement is operative.

For these reasons, we do not recommend any further changes to Map 12.

Birchs Village Limited and WDL Enterprises Limited sought that Direction 3.4 be amended to clarify that Map 12 is not determinative of what land will be determined to be highly productive land by the Canterbury Regional Council.⁹⁹ Officers agree that this is appropriate, and additional wording is recommended below.

For clarity, we also recommend that the section in the draft Spatial Plan which refers to 'Related planning processes currently underway' (page 25) includes the process of mapping highly productive land being progressed by the Regional Council. We recommend a change to the third bullet point to reflect this, together with some additional amendments to reflect updated information regarding the process for reviewing the Regional Policy Statement.

Recommendations:

- a) Amend text under Direction 3.4 (page 65) as follows:

Map 12 is not determinative of the identification of highly productive land for inclusion, by way of maps, in the Canterbury Regional Policy Statement as required by the National Policy Statement for Highly Productive Land.

- b) Amend Map 12 title (page 64) as follows:

Map 12: ~~Highly productive soils~~ **Land Use Capability Class 1-3 soils**

- c) Amend third bullet point under 'Related planning processes currently underway' (page 25) as follows:

Canterbury Regional Council is reviewing the **regional planning framework for Canterbury. A new Regional Policy Statement is expected to be notified at the end of 2024. This process seeks to align the regional planning framework with national direction such as the National Policy Statement for Freshwater Management 2020, including Te Mana o te Wai. It also** ~~Regional Policy Statement, which~~ includes a review of the ~~airport~~ noise contours **relating to Christchurch International Airport, mapping of highly productive land, and development of** ~~developing~~ significance criteria for new greenfield areas, ~~as well as the Regional Coastal Environment Plan and the Land and Water Regional Plan.~~ This review will also continue to consider, and direct, how to manage urban growth in balance with activities that occur in the rural environment.

⁹⁹ Submitter 327

4.4.5 Greenbelt concept

Overview of submissions

As set out above, just over 66 per cent of 289 submitters who responded to the *Have Your Say* survey question¹⁰⁰ stated that they support the concept of a greenbelt around urban areas. Twenty-two per cent indicated they did not support the concept, and 12 per cent were unsure.

Over 150 submission points were coded as relevant to this theme.

Reasons provided by submitters for their support for the greenbelt concept were wide-ranging and included:

- Prevention of urban sprawl or encroachment, and promotion of a compact urban form / network of settlements
- Protection of productive soils / land
- Provision of access to green spaces and opportunities for recreation with associated benefits for communities – physical and mental health and wellbeing
- It would be a ‘draw card’ for future Christchurch residents – amenity, attractiveness
- Benefits for native flora and fauna / ecological value / supporting biodiversity / creation of corridors for animals to travel in and around urban areas
- Climate change mitigation and adaptation benefits – floodwater catchment, mitigate urban heatwave, sequestration of greenhouse gases
- It will provide a boundary between rural and urban environments.

A range of reasons were similarly provided by submitters that did not support, or were unsure whether they would support, the greenbelt concept, including:

- That it represents an urban containment policy, will constrain growth and development, restrict housing supply
- Map A and Policy 6.3.1 of the Canterbury Regional Policy Statement already has the effect of a greenbelt
- Sites or areas which have planning merit could be prevented from being rezoned due to the inflexibility a green belt approach creates, and this is contrary to the responsive planning expectations contained in the NPS-UD
- It potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan; large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan
- Effects on housing affordability / increased land prices
- Whether it is needed / that sufficient green space and rural areas are already available
- It could result in development further from where it is required (on the other side of the green belt), and people having to travel longer distances / development being ‘shunted’ out to satellite towns

¹⁰⁰ Have Your Say survey Q3b: Do you support the concept of a Greenbelt around our urban areas?

- Difficulty in irrigating in over-allocated water zones
- That the evidence of the benefits provided by greenbelts is weak
- Concern that greenbelts around Selwyn would further reduce productive land
- How it will be funded / who will fund it
- Concern that it could create a border / restrict freedom of movement / be used to define parameters of the 15-minute city.

Some submitters made specific comments about the location of the ecological enhancement / greenbelt areas shown on Map 2 and Map 14. Several submitters suggested the greenbelt should be smaller or ‘tighter’ around existing urban areas.¹⁰¹ Another suggested it should be moved further out, to allow for more housing.¹⁰² Some submitters sought the removal of the greenbelts shown on Maps 2 and 14, and all references within the Spatial Plan to greenbelts and / or removal from specific locations (e.g. Templeton).¹⁰³

Many of the comments made by submitters related to the ways in which a greenbelt should be planned, designed, or implemented. Some submitters suggested that there should be strong or binding protection from development, while others suggested the greenbelt areas need to be planned in a way that allows for future population, commercial and / or industrial growth, such that it does not unreasonably constrain growth now and into the future, or limit future choices.

Some submitters supported the intent but suggested alternative approaches or mechanisms, for example: a greenbelt with ‘sprouts’ off it more like a root system; a mix of green wedges and green ways that follow natural features; ‘green fingers’, with development built along transport routes; a more targeted strategy of identifying a concentrated network of natural areas and parks, with future development at the urban fringe integrated around these natural areas. The Ōpāwaho Heathcote River Network¹⁰⁴ supported the enhancement of natural features such as hills, catchments, rivers and wetlands, recognition and prioritisation of blue-green spaces in growth planning and statutory planning documents, and greater emphasis on the importance of well-established integrated landscape design with patch / steppingstone, corridor and matrix configurations to maximise connectivity.

Some submitters¹⁰⁵ suggested that a policy framework that achieves the same outcomes but which does not rely on such a blunt instrument as a greenbelt, will achieve better outcomes and should be sufficient to:

- Provide for open space for nature and recreation
- Manage inappropriate activities and urban development in or near sensitive areas, such as ecological areas, sites and areas of significance to tangata whenua, and historic heritage buildings, sites and areas, and
- Manage urban development or to avoid urban development and other activities that will be affected by natural hazards, where development is not a priority in the short to medium timeframe, while still ensuring future opportunities for growth and development beyond the life of the Spatial Plan are not foreclosed.

¹⁰¹ For example, Submitters 46, 52, 170

¹⁰² Submitter 206

¹⁰³ For example, Submitter 320

¹⁰⁴ Submitter 360

¹⁰⁵ Including, Submitters 304, 339, 340, 362

A number of submissions commented on a lack of clarity. For example, the Environment Canterbury Youth Rōpū¹⁰⁶ sought a more detailed map of the placement of green spaces, and an understanding of what land will be utilised as well as whether it is private or publicly owned, what these spaces will be used for and how, if at all, the redzone will be prioritised for environmental and recreational development. Other submitters commented on a lack of clarity / detail as to the spatial extent of the greenbelt, how it will work in practice, what it will or will not allow, and the ability to adapt to change and utilise these areas, if required, in the future; that it is unclear what the future use of the land between the greenbelt and the existing urban area is intended to be; and that the terms ‘protection of nature’, ‘rural production’ and ‘recreation’ are vague.

Submitters also provided specific examples of the types of uses that they considered could be appropriate within the greenbelt, including – public forest, a water park, low density living opportunities, low coverage industrial uses.

Submissions from infrastructure providers also raised a range of considerations. The submission from CIAL¹⁰⁷ refers to managing bird strike risk and achieving biodiversity outcomes in a complementary manner. Orion Group Limited¹⁰⁸ supports the concept of a greenbelt in principle but referred to the practical implications and need to install, maintain, and protect strategic infrastructure is considered. Waka Kotahi¹⁰⁹ encourages the consideration of integrating walking and cycling access within the design and implementation of the greenbelt to better connect urban areas with the natural environment.

Response to submissions

Key submission points from landowners and the development sector included the risk that implementation of the greenbelt could constrain housing supply, foreclose opportunities for future urban growth and development beyond the life of the Spatial Plan, and prevent sites or areas which have planning merit from being rezoned in the future.

Within the draft Spatial Plan, the term ‘greenbelt’ is defined as ‘a planning tool used to maintain areas of green space around urban areas, often acting as a buffer between urban and rural areas’.¹¹⁰ Figure 8 in the draft Spatial Plan refers to a greenbelt as ‘an area where there is a dominance of open space for nature, rural production, and recreation’. Based on these descriptions, and a general understanding of greenbelt principles, we agree that the ability to rezone sites within the greenbelt for urban residential development would likely be impacted, subject to how the concept is implemented.

However, the draft Spatial Plan sets out a clear strategy for how the projected demand for housing and business development in Greater Christchurch over the next 30 years and beyond to 1 million people will be met, within identified greenfield areas and through further targeted intensification in urban and town centres and along public transport corridors. This is further explained in Section 4.8 of this report. The draft Spatial Plan also acknowledges that the creation of greenfield areas will continue to be part of how more people will be accommodated in Greater Christchurch in the future (page 72).

¹⁰⁶ Submitter 264

¹⁰⁷ Submitter 218

¹⁰⁸ Submitter 336

¹⁰⁹ Submitter 338

¹¹⁰ Key Terms, page 10, draft GCSP.

A principal focus of the draft Spatial Plan is to encourage and incentivise intensification and higher housing densities which support the desired pattern of growth. The greenbelt concept has the potential to support this intent, by helping to manage outward urban expansion. Direction 3.5 in the draft Spatial Plan identifies other potential benefits of the green belt as being to help protect food producing land and green spaces for future generations, provide space for urban forests, wetlands, and ecological restoration areas, increase resilience to climate change and support recreational activities. Many of these benefits were similarly cited by submitters in support of the concept.

We recognise the potential benefits and outcomes a greenbelt concept could deliver but agree with submitters that further work is required, including to define the objectives and opportunities of a greenbelt, how it could work alongside existing planning and development management policies, and the way/s in which it will be planned, designed, and implemented.

This is clearly signalled in the draft Spatial Plan, which states (page 46) that ‘as part of developing an integrated blue-green network strategy, partners will further investigate a sub-regional green belt concept’ and that, ‘subject to the outcome of this work, a green belt plan could form part of the strategy or be a standalone document’. Direction 3.5 (page 65) reiterates this, stating ‘the concept of a green belt in Greater Christchurch needs to be explored in more detail and will be undertaken as part of the development of a blue-green network strategy’.

‘Ecological enhancement / greenbelt’ areas are shown on Map 2: The Greater Christchurch spatial strategy (1 million people) and Map 14: Broad locations of housing and business development capacity (700,000 people). While we do not recommend specific changes in response to submissions seeking a change to the position or complete removal of the greenbelts from these maps, given the further work required to develop the concept we recommend that a note is added to Maps 2 and 14 to make clear that the ecological enhancement / greenbelt areas shown are indicative.

Officers note that many of the comments made by submitters, including those outlined in the paragraphs above, could usefully inform the further investigation of the greenbelt concept through development of the blue-green network strategy. These comments have been collated and categorised, and officers recommend they are given further consideration at the time the blue-green network strategy is developed.

Recommendations:

- a) Add notation to Maps 2 and 14 (pages 29 and 79 respectively) as follows:

Ecological enhancement / greenbelt: The dashed lines are an approximate representation of the location of ecological enhancement / greenbelt areas, to be further investigated.

- b) Amend text under Direction 3.5 (page 65) as follows:

The concept of a greenbelt in Greater Christchurch needs to be explored in more detail, and **this** will be undertaken as part of the development of a blue-green network strategy.

4.5 Opportunity 4 – Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs

Submissions

Opportunity 4 of the draft Spatial Plan is to enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs. As part the consultation process a question was asked on the *Have Your Say* submission form which related to an overarching direction of the Spatial Plan being to focus growth through targeted intensification in urban and town centres and along public transport corridors. Although this overarching direction spans multiple opportunities of the Spatial Plan it has a close association with Opportunity 4. The question was:

“Do you agree that we should focus future development and investment around urban centres and transport corridors?”

287 submitters responded to this question using the online *Have Your Say* form as follows:

Table 8– Responses to *Have your Say* Question 2 - “Do you agree that we should focus future development and investment around urban centres and transport corridors”:

Position	Number of Responses	% of Total Responses
Support	189	65.85%
Opposed	75	26.13%
Unsure	23	8.01%

4.5.1 Future Housing Development

187 submission points were coded to future housing development. The submission points coded to future housing development are principally from the additional comments related to question 2 of the *Have Your Say* form, as well as broad points related to the overarching direction of the Spatial Plan to focus growth through targeted intensification in urban and town centres.

At the macro level, submissions points considered whether the desired pattern of growth in the Spatial Plan represented the best option for Greater Christchurch. Of those that supported the desired pattern of growth, submission points were related to these broad themes:

- Represents an efficient use of land and infrastructure
- Would be more efficient for providing services and cost-savings
- Would lead to greater housing choice and affordability
- Supports people to live where there is greater demand and services available
- Ensures the viability of public transport
- Would result in lower emissions
- Reduces car dependence, supports mode shift and VKT reduction, which reduces congestion, noise and pollution
- Would preserve productive land, greenspace, natural areas and biodiversity
- Would encourage a broader range of land uses resulting in more walkable, accessible and vibrant centres and neighbourhoods.

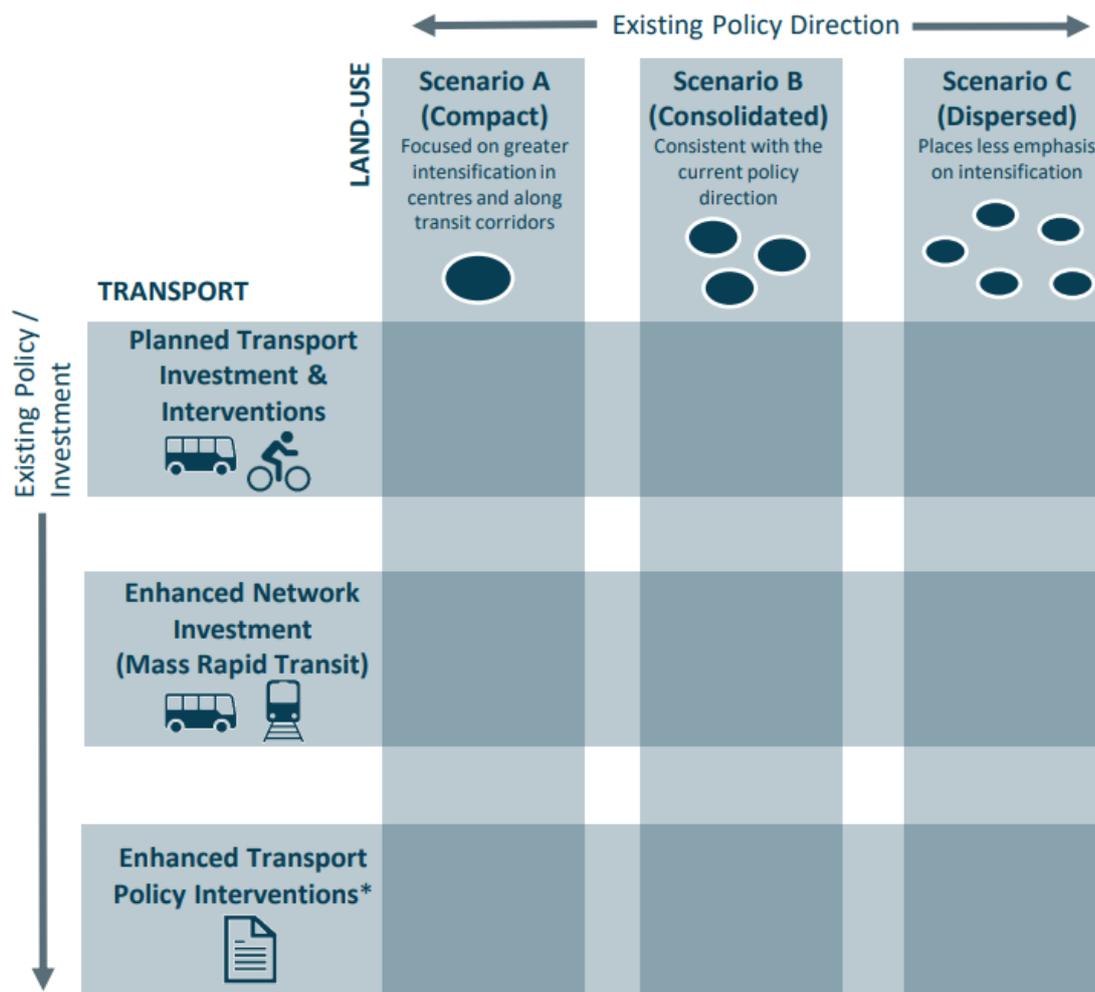
Of those that did not support, were unsure or did not state a position on the desired pattern of growth, submission points were related to these broad themes:

- Is too focused on the central city and excludes the Districts
- Should only focus on intensifying particular areas eg. the central city and surrounds
- Intensification is not appropriate where there are risks from natural hazards
- A more poly-centric urban form with dispersed growth across a broader range of urban and town centres, including those outside of Greater Christchurch is more appropriate
- A more balanced approach to growth is needed which includes new greenfield development to provide sufficient development capacity, housing choice and improve affordability
- Not necessary to co-locate future housing developments around centres due to the infrequent use of these centres
- Current poor patronage of current public transport does not support focusing future development and investment along transport corridors
- Should not unduly constrain the location of development or the market
- Will not necessarily improve housing affordability and could lead to gentrification
- More intense development has poor design outcomes, poor safety, inadequate seismic resilience, inadequate greenspace, leads to social issues, reduces amenity, lowers property values, leads to more crime and reduced wellbeing
- More intense development without the supporting infrastructure will exacerbate existing issues such as congestion and flooding
- Redevelopment and infill through the demolition of existing buildings and removal of trees will impact and disrupt existing communities and threaten historic heritage
- Does not support the way of life (Kiwi dream / way of life) people expect and are accustomed to in Greater Christchurch and New Zealand, which in summary is a more rural and less urbanised lifestyle that includes using a private vehicle, having a stand-alone dwelling with garage and spacious section, outdoor living space and garden

Various submitters considered that consolidated and dispersed urban form scenarios were a more appropriate direction for future growth. As the draft Spatial Plan represents the FDS for the tier 1 urban environment, a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS is a requirement of the NPS-UD.¹¹¹ The Spatial Plan Urban Form Scenario background report had the purpose of understanding how different land-use scenarios and transport packages contribute to the realisation of outcomes and priorities as set out in the Strategic Framework that underpins the draft Spatial Plan.¹¹² This urban form evaluation subsequently informed the development of urban form direction and the draft Spatial Plan. Three land-use scenarios and transport packages were developed to assess the performance of different urban form scenarios against a range of evaluation criteria. The evaluation consisted of quantitative, qualitative and mana whenua evaluation.

¹¹¹ Clause 3.14(1)(b)

¹¹² GCP (2022) Urban Form Scenarios Evaluation Report. [GCP-Urban-Form-Scenarios-Evaluation-Report-v2.pdf](#)
(greaterchristchurch.org.nz)



* Enhanced Transport Policy Interventions package: A representative package of policy and pricing interventions that could help manage transport demand that includes: Work-at-home: 50% increase (from 10% to 15%), Road network speeds: 20% general reduction, PT Fares: 80% Reduction, PT Frequency: 50% Increase, PT Access Time: 10% Reduction, Road Pricing (distance-based charge): \$0.25/km, Cycle level of service: 20% improvement, Walking level of service: 10% improvement, Top rate adjustment: 5% reduction in non-home-based trips

Figure 5: Land use scenarios and transport packages used to assess urban form

The compact scenario (focused on greater intensification in centres and along transit corridors) was assessed as performing best across almost all criteria. This scenario has translated into the overarching direction of the draft Spatial Plan and as the desired pattern of growth.

Some submitters highlighted that the report shows only a 5% difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions. The three transport packages used in the urban form scenarios evaluation are cumulative; i.e. Package 2 includes all of the elements of Package 1; and Package 3 also includes all of the elements of Packages 1 and 2. The three transport packages were assumed to be consistent across each of the three land-use packages.

The three transport packages involved:

1. Incorporating information on planned interventions and investment, and a future Mass Rapid Transit (MRT) scenario.

2. Modelling of transport through the Christchurch Transport Model.
3. The development of a simplified transport model to assess a representative transport policy intervention package.

The best performing combination was the compact land-use scenario with transport package 3 (MRT and additional policy interventions). However, this combination still fell short of key criteria, notably VKT and emissions. The report acknowledges that additional transport interventions are needed to meet anticipated Emission Reduction Plan (ERP) and VKT reduction targets. In the urban form scenario evaluation MRT was a critical transport package for reducing emissions and previous work on MRT found that its viability depends on intensification occurring along the corridors and around the stations.

Some submitters considered that the desired pattern of growth was central city centric. The compact scenario consists of a more mono-centric urban form, the descriptor of the compact scenario from the Urban Form Scenarios Evaluation Report is as follows:

Focused on greater intensification in and around centres and along transit corridors assumes more intensive growth with a higher proportion of household and employment growth concentrated in Christchurch City, and intensified around key centres and corridors, including within the townships. Growth would also be focussed into the existing urban areas of townships, with limited greenfield and low density development.

Centres:

- *Christchurch Central City is the primary centre*
- *Other significant centres – Riccarton, Hornby and Papanui*
- *Growing urban centres – Merivale, Upper Riccarton/Bush Inn, North Halswell*
- *Rolleston and Rangiora are major towns within the Districts*

The compact scenario recognises a polycentric urban form but does have a higher allocation of population and employment to the central city relative to the consolidated and dispersed scenarios. The submitters that considered that the desired pattern of growth was central city centric were proponents of a broader 'balanced' approach to future growth which includes a continuation of greenfield development into the future.

Various submitters did not support targeted intensification in particular urban and town centres or highlighted that particular urban and town centres should be emphasised. Some supported a more dispersed urban form, suggesting that Greater Christchurch could be made up of a series of villages, concentrating growth to particular urban and town centres outside the central city and even further afield than the area of Greater Christchurch (eg. Dunsandel and Amberley). Others considered that the central city and surrounds should be the focus of targeted intensification, noting that outer areas and/or the Districts were inappropriate for a number of reasons including inducing further car dependency or exacerbating traffic issues. Other submitters considered that parts of Christchurch were already saturated with intensive developments, and that the carrying capacity of these areas would not support further intensification.¹¹³ Others considered that Eastern Christchurch offered significant opportunities for targeted intensification to support the desired pattern of growth in the Spatial Plan.

¹¹³ Submitter 363 Richmond Residents' and Business Association Richmond Residents' and Business Association

Various submitters considered that encouraging and providing for future development should not be limited to areas around the significant urban centres and core public transport routes. Some considered that co-locating growth around urban and town centres was unnecessary due to the infrequent nature of visits to centres by residents. The desired pattern of growth in the draft Spatial Plan is to focus household and business growth through greater intensification in urban and town centres, and along public transport corridors. This transit-based and centres-based pattern of growth is consistent with the NPS-UD and would contribute to a well-functioning urban environment. However, some submitters highlight that greater densities can be supported in other areas as well as urban and town centres, and along public transport corridors. The draft Spatial Plan outlines that these locations are the focus but does not preclude dense development from occurring in other locations.

Some submitters considered that there is a potential conflict between transit-orientated development and centres-based development, as both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both. This concern is unfounded in the context of preferred MRT route option for Greater Christchurch and included in the draft Spatial Plan. The route aims to locate stations at major demand destinations such as urban and town centres, as well as at nodes with high clusters of economic focus or serving the everyday needs of household. The street corridor route follows existing arterial routes, aims to maximise access to the rapid transit system with more frequent stops and access to existing urban and town centres at the expense of travel time competitiveness.

At the meso level, various submitters outlined the benefits and challenges associated with targeted intensification. The submission points closely parallel the submission points coded to 'Section 4.5.5 Intensification' of this report. These are summarised in the bullet points on the broad themes of submissions coded to future housing development. Recommendations in relation to intensification are included in Section 4.5.5 of this report.

Some submitters requested that Maps 2 and 14 be amended to include existing large lot residential zones (LLRZs) in Greater Christchurch as is represents a form of low-density urban zoning.¹¹⁴ Part 3 Area-Specific Matters of the National Planning Standards (2019) confirms that LLRZ is a residential zone. The description of the LLRZ in the National Planning Standards (2019) is that it represents "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".¹¹⁵ The NPS-HPL states in the context of urban rezoning that an 'urban zone' includes LLRZ.

Recommendations:

- a) Amend Maps 2 and 14 (pages 29 and 79 respectively) to include any existing LLRZ in Greater Christchurch as part of the existing urban area.

¹¹⁴ Submitters 125, 318 and 323

¹¹⁵ Ministry for the Environment (2019) National Planning Standards (p36).

4.5.2 Opportunity 4 and Directions 4.1 to 4.5

Some submission points supported Opportunity 4, and/or sought changes to the wording of the opportunity and supporting Directions 4.1 through to 4.5.

The Disabled Persons Assembly (NZ) Inc requested that Opportunity 4 be amended as follows:

Enable diverse, accessible and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs.

We consider that universally designed and accessible homes are essential for meeting the needs of the community now and into the future. The broader themes from the submissions received on the Spatial Plan have highlighted that there is insufficient direction on the design and quality of housing. We consider that adaptable, universally designed and accessible homes should be part of quality housing along with other considerations. We recommend that 'quality housing' is included in Opportunity 4. Section 4.5.5 recommends a brief description of quality housing be inserted into the Spatial Plan with a commitment for the Partnership to fully consider what quality housing means in the context of Greater Christchurch in the Joint Housing Action Plan.

Various submitters requested changes to Direction 4.2, particularly around seeking greater alignment with the NPS-UD and UGA in terms of providing at least sufficient development capacity.¹¹⁶ It is considered that the inclusion of at least would provide greater alignment with the wording of the NPS-UD.

Orion sought Direction 4.2 be amended as follows:

Ensure sufficient development capacity (including identifying, protecting, and securing land interests needed for infrastructure) is provided or planned to meet demand.

Given that development capacity is a key term in the draft Spatial Plan and sufficient development capacity is defined by the NPS-UD, we do not consider this suggested change to Direction 4.2 necessary.

Some submitters questioned whether Direction 4.3 was realistic in terms of implementation given perceived challenges of intensification of brownfield areas. Submitter 327 Birchs Village Limited and WDL Enterprises Limited requested that Direction 4.3 be deleted. Submitter 327 considers Direction 4.3 does not give effect to Objective 3 of the NPS-UD which seeks to enable more people to live in areas of an urban environment in which there is a high demand for housing relative to other areas within the urban environment. The submitter is concerned that the "desired" growth has not appropriately considered actual demand from the development community, where people want to live, or demonstrated how it will actually achieve the extensive capacity said to be achieved through intensification of existing urban areas. Objective 3 of the NPS-UD states:

¹¹⁶ Submitters supported by Aston Consultants Resource Management and Planning including submitters 306, 308, 310, 311, 313, 314, 315, 316, 318 and 345

Submitter 327 Birchs Village Limited and WDL Enterprises Limited

Submitter 340 Hughes Developments Limited

Submitter 339 Fletcher Living

Submitter 362 Danne Mora Ltd

Submitter 304 Urban Estates Limited

Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- a. the area is in or near a centre zone or other area with many employment opportunities
- b. the area is well-served by existing or planned public transport
- c. there is high demand for housing or for business land in the area, relative to other areas within the urban environment

Objective 3 is relevant to regional policy statements and district plans, and only one or more of (a), (b) and (c) need apply. The desired pattern of growth is outlined on page 70 of the draft Spatial Plan, which is stated to be:

- More people living in closer proximity to services and employment
- A competitive public transport system to encourage mode shift
- Less reliance on private vehicle use
- A reduction in greenhouse gas emissions
- Efficient and effective use of existing infrastructure
- More affordable and diverse housing choices
- Less need for urban expansion onto highly productive land.

Direction 4.3 is not inconsistent with Objective 3 of the NPS-UD and it is recommended that Direction 4.3 is retained.

A number of submitters requested various changes to Direction 4.4. Submitters 306, 308, 310, 311, 313, 314, 315, 316, 318 and 345 requested the following:

Provide housing choice and affordability to meet housing needs in terms of type, price, and location, of different households, including large lot and low density housing as well as medium and high density housing.

The rationale put forward by submitters is that the wording is consistent with the NPS-UD, as the suggested wording is derived from Policy 1(a)(i) of the NPS-UD. Policy 1(a)(i) of the NPS-UD refers to housing need in terms of type, price and location but does not refer to specific densities. Housing choice is well understood as a broad concept includes type, price and location as well as other aspects of housing choice. We do not consider it is appropriate nor necessary to specifically identify large lot and low density housing nor medium and high density housing in Direction 4.4.

Submitter 327 Birchs Village Limited and WDL Enterprises Limited requested that Direction 4.4 be amended to specifically provide for recognition of greenfield development. As previously stated, housing choice is well understood as a broad concept and specific recognition of greenfield in Direction 4.4 is not supported.

Orion sought Direction 4.4 be amended as follows:

Provide a range of choice of healthy homes taking into account affordability ~~housing choice and affordability~~

Orion seeks that the Spatial Plan emphasises the importance of energy efficient buildings and healthy homes. We accept that the quality of homes should be included in Opportunity 4 and Direction 4.5 under Opportunity 4 of the Spatial Plan, particularly given that one of the Whakawhanake Kāinga Komiti's priorities is accelerating the provision of quality, affordable housing and the community aspirations for Greater Christchurch in 2050 includes affordable and quality housing options. Direction 4.5 is more appropriate for the inclusion of quality housing.

Ara Poutama requests that Direction 4.4 be amended as follows:

Direction 4.4 Provide diverse housing options, choice and affordability to meet the needs of the community.

The submitter's rationale is that Spatial Plan should recognise a full range of residential activities. We consider that 'housing choice' represents that full range of residential activities as it is a broad and well understood term. 'Diverse and affordable housing to meet people's day-to-day needs' is included under Opportunity 4.

Christchurch International Airport Ltd highlights that Direction 4.5 refers to "community infrastructure", however there are limited references to broader infrastructure and the resilience and future-proofing of infrastructure provision.¹¹⁷ Christchurch International Airport considers that these elements need to factor into Opportunity 4 of the draft Spatial Plan. Similarly, Lyttelton Port Company Limited supports the reference to the delivery of "community infrastructure" but considers that other types of infrastructure, such as Lyttelton Port Company Limited's strategic assets and the supporting freight network, will also be crucial to deliver quality living environments.¹¹⁸ Lyttelton Port Company Limited therefore considers that the Directions should be expanded to recognise broader infrastructure needs. It is not clear what constitutes 'community infrastructure' in the context of the draft Spatial Plan, particularly as it is not included as a key term and the key term 'social infrastructure' includes community facilities and seemingly other aspects of what could be understood as community infrastructure. The key term 'social infrastructure' is also not used anywhere else in the Spatial Plan aside from the key term itself. We acknowledge that the infrastructure needs to support thriving neighbourhoods are broad, and should be recognised as such.

Recommendations:

- a) Amend Opportunity 4 (pages 9, 31 and 67) as follows:

Enable diverse, **quality**, and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs.

- b) Amend Direction 4.2 (pages 31, 67 and 73) as follows:

Ensure **at least** sufficient development capacity is provided or planned for to meet demand

- c) Amend Direction 4.5 (pages 31, 67 and 73) as follows:

¹¹⁷ Submitter 218

¹¹⁸ Submitter 332

Deliver thriving neighbourhoods with quality developments, **quality housing** and supporting ~~community~~ infrastructure.

d) Amend the reference to ‘community infrastructure’ on page 37 as follows:

Rolleston is a strong residential growth node with high quality ~~community~~ infrastructure and a developing town centre providing retail and hospitality.

e) Delete ‘Social Infrastructure’ as a Key Term (page 11) in the Spatial Plan.

4.5.3 Greenfield and Urban Sprawl

54 submissions were received in relation to greenfield and urban sprawl, excluding submission points related to particular greenfield opportunity sites and/or areas to be included in the Spatial Plan as future urban areas which have been coded separately. Submission points coded to urban sprawl do not include submission points coded to the greenbelt, although some submission points coded to the greenbelt relate to urban sprawl as the draft Spatial Plan outlines that “a greenbelt around Greater Christchurch’s urban areas could help limit urban expansion”.¹¹⁹

2 submitters completely opposed the inclusion of further greenfield areas in the Spatial Plan. 14 submitters had a softer stance and considered that the desired pattern of growth of Greater Christchurch should focus on combatting urban sprawl for a myriad of perceived benefits such as VKT reduction, mode-shift, emissions reductions, more vibrant centres, a viable public transport system, efficiencies in providing infrastructure, protecting highly productive land, protecting biodiversity, providing housing choice and affordability. 33 submission points called for ‘balanced growth’ into the future, which represents a continuation of greenfield development alongside brownfield development to accommodate future projected growth and provide for housing choice. Some submitters considered that balanced growth is needed to meet the needs of the market terms of location, type and price in order to support the competitiveness of land and development markets. Some submitters also outlined the benefits of greenfield development, which included demonstratable benefits from previous greenfield developments in Greater Christchurch. Some outlined the benefits of greenfield development relative to brownfield development, which in summary related to providing housing choice, improving housing affordability, bringing housing to market quicker and at scale as well as the opportunity to deliver outcomes that would not otherwise be achievable through brownfield development. Various submitters also considered that greenfield development can deliver housing at densities that support the desired future state for Greater Christchurch. The draft Spatial Plan acknowledges that there has been a trend towards increasing greenfield density over the last few years.

Most submission points do not support the greenfield approach in the draft Spatial Plan, in particular noting that the draft Spatial Plan does not spatially identify greenfield areas on Maps 2 and 14. Some submitters were critical that as a spatial plan, Maps 2 and 14 did not spatially identify the broad locations for future greenfield growth. Submitters that considered that both Maps 2 and 14 should spatially identify new greenfield areas typically were those which contained greenfield opportunity sites and/or areas. A number of submissions considered that the Map 14 did not spatially identify the broad locations in which development capacity will

¹¹⁹ GCSP (2023) p.65.

be provided over the long term in future urban areas. These submission points have been considered in Section 4.12.3 of this report as this is a requirement of clause 3.13(2)(a) of the NPS-UD in relation to requirements of an FDS. The particular greenfield opportunity sites and/or areas have been considered in Section 4.5.4 of this report.

Various submissions focused on Map 2 the Greater Christchurch spatial strategy (1 million people). Map 2 is described in the draft Spatial Plan as a visual representation of the strategy. Fletcher Living¹²⁰, Hughes Developments Limited¹²¹, Danne Mora Ltd¹²² and Urban Estates Limited¹²³ raised particular issue with Map 2. They consider that Map 2 represents future growth beyond 2050 (presented as 700,000 people). These submitters acknowledged that the draft Spatial Plan states that further additional greenfield development may be required for the longer term and to provide for a population towards one million. They consider that this is not spatially identified on Map 2 of the draft Spatial Plan.

Other submitters raised similar points, albeit not specifically in reference to Map 2. Submitters broadly considered that the draft Spatial Plan has not taken the opportunity to spatially identify the longer-term preferred direction for urban growth beyond what is already provided for by existing urban areas, rezonings and future urban areas already identified through existing planning documents and processes. Submitters consider that this approach does not take the opportunity to promote long-term strategic planning, particularly the coordination of infrastructure with land-use. These submitters considered that, in particular, the opportunity to identify greenfield transit-orientated development which would support the direction of the draft Spatial Plan and the desired pattern of growth has been missed.¹²⁴

The draft Spatial Plan is not sufficiently clear on the distinguishing between the process for identifying broad locations in which development capacity will be provided and the parameters of successful future greenfield development. There is an interrelationship between the two in respect of greenfield development, and both delve into aspects of urban form, albeit at two different spatial scales. It is important to distinguish that identifying broad locations in which development capacity will be provided is not exclusively related to locations of future greenfield. The broad locations shown on maps 2 and 14 of the draft Spatial Plan demonstrate this by spatially identifying broad locations that are already urban but are intended to accommodate additional development capacity through redevelopment, infill, and intensification.

Under the description of Direction 4.2 on page 69 of the draft Spatial Plan is the following sentence:

“locations for development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth”.

This seemingly references the requirements of an FDS under the NPS-UD to spatially identify broad locations in which development capacity will be provided over the long-term. The first part of the sentence is ambiguous as it refers to “the direction in the Spatial Plan” which in the broadest sense would include the Spatial Plan in its entirety. The desired pattern of growth is described on page 32 of the draft Spatial Plan to be a “focus household and business growth through greater intensification in urban and town centres, and along public transport corridors”.

¹²⁰ Submitter 339

¹²¹ Submitter 340

¹²² Submitter 362

¹²³ Submitter 304

¹²⁴ Submitters 125 and 258 as examples

Under the description of greenfield on page 72 of the draft Spatial Plan, there are four success parameters for greenfield development listed:

1. Be well connected with employment, services and leisure through public and active transport networks
2. Be integrated with existing urban areas
3. Meet a need identified by the latest Housing and Business Development Capacity Assessment
4. Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.

These four success parameters for future greenfield development are not appropriate for considering broad locations at the highest level. First and foremost, broad locations are not exclusively greenfield areas. The draft Spatial Plan should provide greater clarity of the key aspects which guide the identification of broad locations into the future. This should just be indicative of key considerations to ensure there is still robust consideration of the direction of the Spatial Plan and desired pattern of growth.

The draft Spatial Plan acknowledges that kāinga nohoanga does not fit the western paradigm of residential, commercial, industrial and rural activities. The development of kāinga nohoanga on Māori Land and within urban areas is to be determined by mana whenua.

A number of submitters called for significance criteria to be developed as per clause 3.8(3) of the NPS-UD.¹²⁵ Submitters considered that without spatially identifying preferred locations for greenfield growth in the long and longer term or providing significance criteria there is substantially less assurance for the development sector that proposals support the desired pattern of growth in the draft Spatial Plan.

The draft Spatial Plan states that Canterbury Regional Council is reviewing the Canterbury Regional Policy Statement, which includes developing significance criteria for new greenfield areas. The inclusion of criteria on significant development capacity is essential for ensuring transparency about how an assessment will be undertaken to determine significance under Policy 8 of the NPS-UD. As the draft Spatial Plan is not the CRPS, it does not include significance criteria. The draft Spatial Plan will provide a foundation for the review of the CRPS and as such the draft Spatial Plan includes four success parameters for greenfield development on page 72.

Some submitters maintained that there was a general need for the draft Spatial Plan to enable development and to respond to unanticipated out-of-sequence developments.¹²⁶ Submission points referenced the NPS-UD, in particular Objective 6(c), Policy 8 and Subpart 2 of Part 3. Infinity Investment Group Holdings Limited¹²⁷ supports the identification of locations for growth that are integrated with existing urban areas, achieve a well-functioning urban environment and aligns with criteria similar to what is included in the draft Spatial Plan. Birchs Village Limited and WDL Enterprises Limited¹²⁸ were not supportive of the success parameter that greenfield development be integrated with existing urban areas on the basis that it does not give effect to Policy 8 of the NPS-UD.

Summerset Group Holdings Limited considered that for greenfield development to be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented

¹²⁵ See submitters 207, 326 and 327

¹²⁶ See submitters 125, 240, 306, 308, 310, 311, 312, 314, 315, 316, 318, 320, 326, 327, 337 and 345

¹²⁷ Submitter 326

¹²⁸ Submitter 327

primary production activities combined with the identified areas spatially identified to ‘protect, avoid and enhance’ effectively limits land use activities requiring larger areas of land and restricts large swathes of the Greater Christchurch area from further development. The pattern of growth aligns with national direction to protect highly productive land for land-based primary production as well as appropriate statutory requirements of identifying areas and values to protect, avoid and enhance. We address the broad nature of the mapping in the draft Spatial Plan and recommend that ‘avoid’ be amended to ‘avoid or mitigate’. This has been considered under Opportunity 2 where there is a more detailed assessment.

Birchs Village Limited and WDL Enterprises Limited did not support the success criteria that greenfield development should meet a need identified by the latest Housing and Business Development Capacity Assessment, as the assessments are authored by local authorities and that it does not give effect to Policy 8 of the NPS-UD. Guidance from MfE on responsive planning, includes some specific guidance on developing significance criteria, which is as follows:

“The criteria will need to align with the higher-level objectives of the NPS-UD. Criteria could include an assessment of the development capacity proposed against demand identified in a housing and business development capacity assessment, the scale of development appropriate to support a well-functioning urban environment in that city or town, and the ability to service the development with infrastructure.”¹²⁹

The NPS-UD is not overly prescriptive on what must be included in significance criteria, and the four success parameters for greenfield development appropriately considers the NPS-UD including the higher-level objectives. The four success parameters for greenfield development are a useful ‘stop-gap’ ahead of formal significance criteria being developed and included in the CRPS.

Recommendations:

- a) Amend page 69 of the draft Spatial Plan as follows:

Further to this, **broad** locations for **residential** development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth. **Identifying broad locations for residential development should be guided by the Spatial Strategy, including the six opportunities, directions and the overarching directions that shape the desired pattern of growth. Broad locations at a minimum:**

1. **Adjoins to or are within a Significant Urban Centre, Major Town or a Locally Important Urban Centre in Greater Christchurch**
2. **Are accessible to either MRT, Core Public Transport Routes or New / Enhanced Public Transport Routes**
3. **Protect, restore and enhance the natural environment, historic heritage and sites and areas of significance to Māori**
4. **Are free from significant risks arising from natural hazards and the effects of climate change**

¹²⁹ Ministry for the Environment (2020) National Policy Statement on Urban Development 2020 – responsive planning fact sheet. <https://environment.govt.nz/assets/Publications/Files/Responsive-Planning-Factsheet.pdf>

4.5.4 Greenfield Opportunity Sites and Areas

Several submitters proposed particular greenfield opportunity sites and/or areas to be included in the Spatial Plan as future urban areas.¹³⁰ In total, 28 greenfield opportunity sites and/or areas were proposed for predominantly residential development (acknowledging some sites and/or areas would include a commercial component). The sites and/or areas proposed by submitters are represented on Figure 6, and are labelled with the submitter ID. Where a submitter has more than one site and/or area their submitter ID will display accordingly.

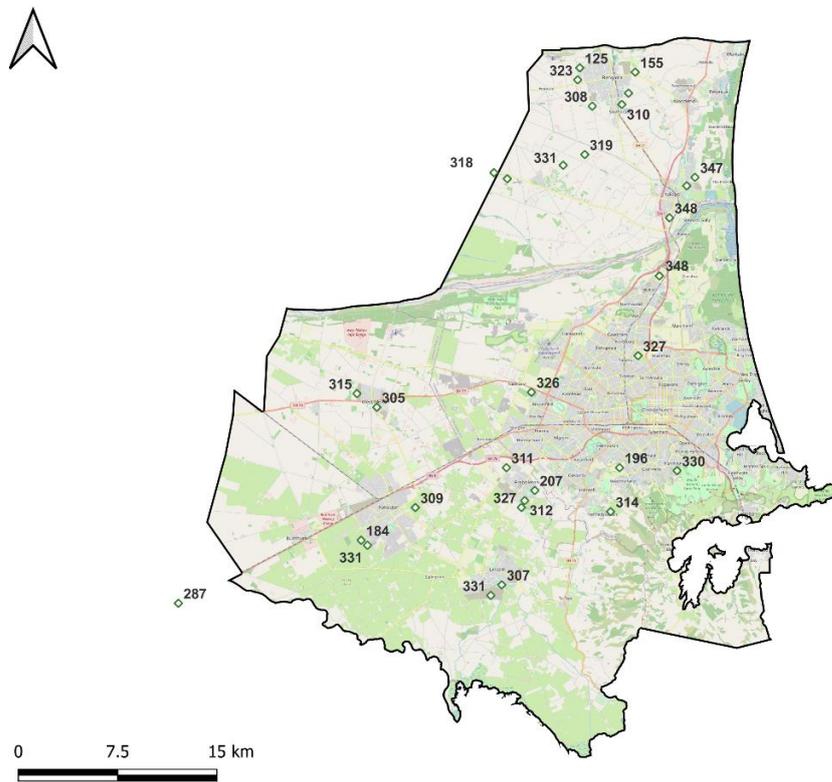


Figure 6: Greenfield residential sites and/or areas indicative locations by submitter ID.

There is a technical shortfall in housing development capacity in the long term, as determined by the HCA and recorded in the draft Spatial Plan. This shortfall is in the Selwyn District and is less pronounced than at the time of the HCA as a result of the DPR and IPI processes. The technical shortfall is anticipated to manifest at the end of the long-term, around 2050.

The response to this shortfall as stated in the draft Spatial Plan will be to explore the feasibility of intensification, especially around centres and public transport routes, and increase minimum densities for new greenfield areas. Exploring interventions for improving the feasibility of intensification constitutes an appropriate response to the insufficiency as it recognises that the insufficiency is not wholly a result of RMA

¹³⁰ Note submitters used a variety of terminology from previous spatial planning processes in Greater Christchurch such as greenfield priority area and/or future urban development area.

planning documents. Recommendations on formalising the response to the insufficiency in the Joint Work Programme is included in Section 4.5.5.

This approach takes account of the significant amount of plan-enabled capacity in Greater Christchurch, and the need for a response that closes the gap between plan-enabled and commercially feasible capacity. This approach aligns with the desired pattern of growth in Greater Christchurch which is to focus household and business growth through greater intensification in urban and town centres, and along public transport corridors. The desired pattern of growth has been assessed as being best able to deliver on the six opportunities of the draft Spatial Plan. The draft Spatial Plan states that additional greenfield will be assessed through other statutory processes. We consider that additional greenfield sites and/or areas would be most appropriately considered by other statutory processes¹³¹, whereas the Spatial Plan should remain at a spatial scale that sets the broad locations in which development capacity will be provided over the long term and beyond. A recommendation that guides the identification of broad locations over the longer term has been made in Section 4.5.3. It is also worth acknowledging that work is underway for developing significance criteria for new greenfield areas. It is our view that the draft Spatial Plan provides sufficient direction, and broad locations, for long term growth (as required under the NPS-UD) and consideration of 'greenfield' opportunities within, or beyond, those locations is best considered in other processes.

After completing hearings on the DPR and the IPI, and receiving recommendations from the Council appointed Hearing Panels, SDC's decisions on both the DPR and IPI were publicly notified on the 19th August 2023. Submitters have requested that maps in the GCSP be updated to account for the decisions. The notified version of the Selwyn Proposed Plan has now been superseded by the 'Decisions Version' of the Partially Operative Selwyn District Plan and includes new planning maps. It is appropriate that the maps of the Spatial Plan are updated to reflect these changes and a recommendation is made in Section 4.12.3 in the context of spatially identifying broad locations in which development capacity will be provided over the long term. A number of greenfield opportunity sites and/or areas have been affected by SDC's decisions on the DPR and IPI. In Selwyn as a result of the IPI and DPR process additional capacity has been added to the short-medium term. SDC's decisions on the DPR and IPI in relation to the sites and/or areas put forward by submitters in the Selwyn District portion of Greater Christchurch is summarised as follows:

West Melton

The subject land/area of submitter 305 was included in the UGO and has since been live zoned to GRZ as a result of the Selwyn DPR and IPI processes.

The subject land/area of submitter 315 includes two areas west of West Melton, including the area of PC77. The subject land of PC77 was live zoned to GRZ as a result of the Selwyn DPR and IPI processes.

Rolleston

The subject land/area of submitter 309 includes the approved PC71 land as well as the land under the 50Ldn airport noise that was not approved by the Commissioner. The PC71 land excluding land under the 50Ldn airport noise has been live zoned to MRZ as a result of the Selwyn DPR and IPI processes. The IHP of the IPI considered it would be inappropriate to rezone land within the 50 dBA Ldn Noise Control Overlay from GRUZ

¹³¹ For example, the RPS, District Plan Reviews and Plan Changes (Council or Private).

to enable residential development as to do so would rely on an as yet unknown outcome of CRC's review of the airport noise contours.¹³²

The subject land/area of submitters 184 and 331 includes an area west of Dunns Crossing Road a mixture of land that is GRUZ and LLRZ. The subject land/area of the two submitters includes PC73, 81 and 82 areas. PC73 was also included in Part B of the IPI however no change was made to it as SDC considered that urban form connectivity and reverse sensitivity matters formed the basis of a qualifying matter, making the land inappropriate for MDRS.¹³³ The decision of SDC on PC73, 81 and 82 has been appealed to the Environment Court.

Lincoln

The subject land/area of submitter 307 has been live zoned to MRZ as a result of the Selwyn DPR and IPI processes.

The subject land/area of submitter 331 in Lincoln, includes the PC69 area which has been live zoned to MRZ as a result of the Selwyn DPR and IPI processes.

Prebbleton

The subject land/area of submitter 207 is 93 Tosswill Road in Prebbleton with the corresponding legal description of Lot 4 DP 538252. This land has been live zoned to MRZ as a result of the Selwyn DPR and IPI processes.

The subject land/area of submitter 311 includes land west of Shands Road. Submitter 311 also included this land/area as part of their submission on the Proposed Selwyn District Plan. No zoning changes to this area have occurred as a result of the Selwyn DPR and IPI processes.

The subject land/area of submitter 312 refers to PC72 which was approved by SDC and was also included in Part B of the IPI. The subject land/area has been live zoned to MRZ as a result of the Selwyn DPR and IPI processes.

The subject land/area of submitter 327 refers to PC79. SDC recently accepted the Commissioner's recommendation to decline the plan change request. This decision was publicly notified on the 6th September 2023, providing an opportunity for parties involved in PC70 to lodge an appeal against the decision.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions. A recommendation is made in Section 4.12.3 on spatially identifying broad locations in which development capacity will be provided over the long term in relation to recent rezonings in the Selwyn District.

¹³² Selwyn District Council (2023) IPI Part B Recommendation Report. [V1-IPI-Operative-District-Plan-Recommendation-Report.pdf \(selwyn.govt.nz\)](#)

¹³³ Selwyn District Council (2023) IPI Part B Recommendation Report. [V1-IPI-Operative-District-Plan-Recommendation-Report.pdf \(selwyn.govt.nz\)](#)

4.5.5 Intensification

78 submissions were coded to intensification. Intensification forms a large component of the draft Spatial Plan and is represented throughout.

Table 9 – Summary of coded submission points on Intensification

Position	Number of Responses	% of Total Responses
Support	27	34.62%
Support in Part	2	2.56%
Opposed	24	30.77%
Unsure	4	5.13%
Not Stated	21	26.92%

The 27 submission points that were in support of intensification broadly consisted of the following themes:

- Intensification represents an efficient use of land and preserves land for land-based primary production, green spaces, natural areas and biodiversity
- Intensification supports sustainable transport choices, reduces car dependency, reduces VKT and emissions from land-transport, and makes public transport options viable
- Intensification improves housing affordability and increases housing choice
- Intensification that is mixed-use provides for greater accessibility, supports centres and the local economy
- Intensification provides greater social cohesion, greater sense of community and attractive neighbourhoods

The 2 submission points that were in partial support of intensification the submission points broadly consisted of the following themes:

- Conditional support on the basis of better design outcomes and safety measures than what has been previously delivered in Greater Christchurch and elsewhere

The 24 submission points opposed to intensification broadly consisted of the following themes:

- Poor design outcomes, which results in a poor living environment and quality of life for those intensified housing with consequences on well-being
- Poor design outcomes, and the effects on the surrounding environs including amenity, congestion, safety concerns, antisocial behaviour concerns, poor social cohesion, lower sense of community, increased noise and pollution

- Concerns of the resilience of multi-storey developments in the face of the natural hazard and climate change risks posed, in particular earthquakes and the prospect of an Alpine Fault rupture
- Did not support intensification in particular areas of Greater Christchurch

Of the coded submission points where the position was not stated and or unsure, the submission points broadly consisted of the following themes:

- Hesitance regarding intensification on the basis of poor design outcomes currently being delivered in Greater Christchurch and elsewhere
- Hesitance regarding intensification on the basis that intensification has not typically been sensitively incorporated into existing urban areas or appropriately accounted for impacts on the existing communities
- Recognising that intensifying existing urban areas along transport corridors can result in the gentrification of areas, and does not have the desired effect on housing affordability
- Criticism of the intensification focus of the draft Spatial Plan rather than intensification itself from the proponents of the ‘balanced growth’ approach with the relative merits of greenfield development put forward
- The identification of the operational challenges of intensifying existing urban areas, including sequencing intensification in preferred areas, infrastructure constraints and costs, acquiring brownfield land and feasibility challenges

We do not consider that substantial changes are required to the Spatial Plan in response to the submission points coded to intensification. It is clear from the submission points received, that if there is to be housing intensification into the future, then it needs to be designed well and sensitively incorporated into existing areas to ensure that poor outcomes are averted where possible. This reflects a key theme from the HuiHui Mai engagement which is summarised on page 6 of the draft Spatial Plan that “many people are open to high density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people”.

There is, however, little mention of quality or design of housing in the draft Spatial Plan. One of the Whakawhanake Kāinga Komiti’s priorities is accelerating the provision of quality, affordable housing. The community aspirations for Greater Christchurch in 2050 includes affordable and quality housing options. Submitters outlined key features for well-designed and quality housing which included functionality, universal design, accessibility, lower embodied carbon, thermal and energy efficiency, seismic resilience, healthiness and habitability (warm and dry), safety, sense of privacy, good urban design, and appropriate bulk and location standards. Submitters highlighted the important of well-designed and quality housing within the context of greater intensification in particular.

There is no clear direction in the draft Spatial Plan that housing should be well-designed or of a good quality, apart from Direction 4.5 in a limited capacity, as it includes ‘quality developments’. Although Direction 4.5 includes quality developments, the subsequent description and explanation only considers the neighbourhood

spatial scale in terms of thriving neighbourhoods.¹³⁴ Thriving neighbourhoods are provided with a detailed description in the draft Spatial Plan and is conflated with a subsequent term ‘connected neighbourhoods’. Thriving neighbourhoods seemingly have strong associations with the outcome of ‘thriving and resilient communities’ in the GPS-HUD and well-functioning urban environments. The GPS-HUD differentiates between quality at these two spatial scales, referring to the quality of places and the quality of housing.

There is no description of what quality developments are in the draft Spatial Plan and how they contribute to a thriving neighbourhood. The wording of Direction 4.5 does however infer that to deliver thriving neighbourhoods, quality developments are necessary. Without a description of quality developments in the draft Spatial Plan the relationship between quality developments and thriving neighbourhoods is unclear.

Quality developments may include the provision of quality housing; however, this is not explicit in the draft Spatial Plan. The absence of quality housing under Opportunity 4 and associated directions means there is inadequate consideration of quality housing in the draft Spatial Plan. Quality housing is a priority of the Whakawhanake Kāinga Komiti and is recorded as one of the community aspirations for Greater Christchurch. Furthermore, aspects of design and quality emerged strongly through submissions on housing and intensification.

Without any definition or descriptor of what constitutes quality in terms of housing, we have relied on the GPS-HUD to inform our understanding of what could be meant by quality housing. The GPS-HUD sets the direction for housing and urban development in a national context. The GPS-HUD includes a vision underpinned by four aspirational outcomes that are informed by six focus areas that are essential for achieving the outcomes.

The GPS-HUD states that “the GPS-HUD focuses on increasing the supply of housing, improving access to housing, improving the quality of housing and reducing inequity in housing across our communities and places” and that “this approach is broadly in line with the concept of the right to a decent home”.¹³⁵ On this basis, quality housing can be understood as a separate consideration to increasing supply, improving access and reducing inequity in housing. This statement in the GPS-UD is related to a human rights-based approach to housing. A human rights-based approach to housing and the right to a decent home is recognised in various international human rights declarations and treaties. Te Kāhui Tika Tangata | New Zealand Human Rights Commission launched a national inquiry into the right to a decent home in 2021. The final report of the inquiry, as well as previous publications have built an understanding of what is meant by a right to a decent home in the national context.¹³⁶ In short, a decent home is safe, warm, dry, affordable, secure, accessible and culturally adequate. It is supported by necessary infrastructure such as water, and accessible to key services and facilities such as education, health providers, and community.

The vision in the GPS-HUD encompasses homes of a high quality that meet people’s needs over their lifetime and are able to support their overall wellbeing. Quality housing is associated with the ‘wellbeing through housing’ objective in the GPS-HUD. This objective is that “everyone lives in a home, whether rented or owned, that is stable and affordable. The quality, accessibility, size, and features of our homes support people and

¹³⁴ GCSP (2023) p.73.

¹³⁵ Te Tūāpapa Kura Kāinga | Ministry of Housing and Urban Development (2021) Government Policy Statement on Housing and Urban Development. (p.9).

¹³⁶ Te Kāhui Tika Tangata | New Zealand Human Rights Commission (2023) Implementing the right to a decent home in Aotearoa: Fairness and dignity for all. [Housing Inquiry final report - Implementing the right to a decent home in Aotearoa Fairness and dignity for all.pdf\(nationbuilder.com\)](https://www.nationbuilder.com/te-kahui-tika-tangata/Implementing-the-right-to-a-decent-home-in-Aotearoa-Fairness-and-dignity-for-all.pdf)

families to live healthy, successful lives.”¹³⁷ The GPS-HUD sets an expectation under this outcome that people are living in quality homes that meet their needs. This establishes a relationship with the focus area to ‘ensure houses meet needs’. The intention of this focus area is “to ensure that our houses are warm, dry, accessible, affordable to run, and meet the needs and changing life circumstances of families and households”.¹³⁸ Under this focus area is a statement that “Aotearoa New Zealand doesn’t have the variety or quality of housing to support the wellbeing of all people” and as such there is a “need to ensure that the houses we are building are resilient (including climate resilient), healthy, universally designed and accessible” as well as “adaptable, resource efficient and affordable to run”.¹³⁹ This infers that by building houses to address these shortcomings, the variety and quality of the housing stock would improve. The GPS-HUD does not define quality housing, nor does it describe in detail what features contribute to the quality of housing.¹⁴⁰ The GPS-HUD does however establish that quality housing is associated with wellbeing, and that quality housing meets the needs of people and families supporting them to live healthy, successful lives.

The draft Spatial Plan provides insufficient direction on both quality developments and quality housing. This direction is critical for setting expectations on what is appropriate and expected from new developments in Greater Christchurch to support the vision of the Spatial Plan and direct the Joint Housing Action Plan.

Recommendations:

- a) Amend the description of a thriving neighbourhood (page 73) as follows:

They are neighbourhoods that **are well connected**; enable safe and equitable access for all; have high quality and safe open spaces, green spaces and public realm; and provide **a diverse range of housing choice including** for social and affordable housing.

- b) Amend the section titled ‘vibrant communities with access to services’ (page 73) to **Features of Thriving Neighbourhoods**.

- c) Amend the title and the internal heading of Figure 12 (page 73) from Features of connected neighbourhoods to **Features of Thriving Neighbourhoods**.

- d) Amend the second instance of the title ‘Community facilities and open, green and public spaces’ (page 74) to ‘Sense of Connection and Safety’

- e) Insert a new section after ‘Community facilities and open, green and public spaces’ titled ‘Quality Developments and Quality Housing’ (page 74) as follows:

¹³⁷ Te Tūāpapa Kura Kāinga | Ministry of Housing and Urban Development (2021) Government Policy Statement on Housing and Urban Development. (p.5).

¹³⁸ Te Tūāpapa Kura Kāinga | Ministry of Housing and Urban Development (2021) Government Policy Statement on Housing and Urban Development. (p.24).

¹³⁹ Te Tūāpapa Kura Kāinga | Ministry of Housing and Urban Development (2021) Government Policy Statement on Housing and Urban Development. (p.24).

¹⁴⁰ Stats NZ have however developed a framework for housing quality as part of a co-design project working with the Ministry of Business, Innovation and Employment (MBIE), the Ministry of Housing and Urban Development (HUD), and the Building Research Association of New Zealand (BRANZ). This includes a definition for housing quality and four interconnected elements of housing quality. Refer to Stats NZ (2019) Framework for housing quality. www.stats.govt.nz/assets/Uploads/Methods/Framework-for-housing-quality/framework-for-housing-quality.pdf

Quality Developments and Quality Housing

Quality developments and quality housing are at the heart of thriving neighbourhoods, enriching the lives and wellbeing of our communities. Quality developments support neighbourhoods to develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Quality housing meets the diverse needs of the community over their lifetime and ensures that individuals, whānau and communities can live well so our neighbourhoods thrive for all. The Joint Housing Action Plan will consider quality housing in the context of Greater Christchurch.

- f) Amend the purpose of the Joint Housing Action Plan on page 90 as follows:

To create a housing action plan that ensures the entire housing continuum is working effectively to provide **quality**, affordable housing choice and diversity.

- g) Amend the second 'Community facilities and open, green and public spaces' heading on page 74 to read **'Sense of connection and safety'**¹⁴¹

4.5.6 Housing Provision

34 submission points were coded to housing provision, encompassing submission points that were generally related to the provision of affordable housing, social housing, community housing as well as alternative models and forms of housing. Submissions received on kāinga nohoanga have been coded separately. Submission points coded to housing provision are strongly associated with Direction 4.4 Provide housing choice and affordability.

There was broad acceptance in the submission points coded to housing provision that housing affordability was an important challenge facing Greater Christchurch. Submission points considered that in providing affordable housing, including social housing, that care should be taken as to where this is located and that particular concentrations of affordable housing, including social housing can lead to unfavourable outcomes. Some submissions considered that it was imperative that housing typologies and tenures were mixed across Greater Christchurch. Furthermore, some submitters considered that delivering a range of housing typologies, innovative approaches to delivering housing, providing sufficient development capacity and the continuation of greenfield development were all part of the solution of providing more affordable housing. The direction and content of the draft Spatial Plan largely aligns with these submission points.

One submitter considered that the following statement under the context section of Opportunity 4 is questionable:

"Greater Christchurch has maintained a good supply of housing that is relatively affordable for middle to high income households, especially compared to other parts of the country."

¹⁴¹ The repetition of this heading was an error from the approved draft to the print version.

The submitter considers that this statement neglects the housing need of low income households. The context section of Opportunity 4 represents the current state, including recognising deficiencies in the provision of adequate housing for low income households. The Spatial Plan has the implicit purpose of closing the gap between the current and desired future states for Greater Christchurch. The draft Spatial Plan outlines the approach of the Partnership which is addressing housing affordability for low income households.

Other submitters consider that the draft Spatial Plan does not go far enough to implement measures to improve the supply of affordable housing. The draft Spatial Plan outlines that housing need in Greater Christchurch will be addressed through the development of a Joint Social and Affordable Housing Action Plan, as well as through the key moves. The reference to a Joint Social and Affordable Housing Action Plan on page 72 is an error: this should be the Joint Housing Action Plan.

Submitter 139 considered that modern transportable homes and transportable homes villages are an efficient option for affordable housing that can accommodate older persons and disabled people. The draft Spatial Plan does not restrict transportable homes as option for providing housing nor innovative housing approaches.

One submitter considers that the Spatial Plan is incoherent in that it identifies there will be an increase in one-person households and a need for more multi-generational housing.¹⁴² This statement reflects the findings of the HCA and the Livingston and Associates (2021) Housing Demand and Need in Greater Christchurch report that informed the HCA.¹⁴³ Greater Christchurch's ageing population is projected to lead to significant growth in the number of one person and couple only households leading to a significant increase in the demand for smaller and multi-unit dwellings. Simultaneously, as the population grows and becomes increasingly diverse, the demand for multi-generational housing also increases. The two statements are not mutually exclusive, and the HCA indicates that a broad range of household types and sizes are expected in Greater Christchurch into the future. The draft Spatial Plan recognises that people live differently depending on their individual needs and preferences, family situation, and background. Enabling a range of living options to suit a broad spectrum of housing preferences in Greater Christchurch is appropriately considered in the draft Spatial Plan.

In terms of housing choice, various submission points highlighted that with greater intensification around centres and along public transport routes that it was important that future housing, particularly at higher densities, is well designed and suitable to meet the needs of a diverse range of people. Disabled Persons Assembly (NZ) Inc estimate that there could be between 140,000 and 200,000 disabled people residing in the Greater Christchurch area by 2051. Disabled Persons Assembly (NZ) Inc considers that disabled people are disproportionately impacted by poor housing outcomes, and that the communities in Greater Christchurch should be accessible and inclusive. Disabled Persons Assembly (NZ) Inc identified that housing in Greater Christchurch, particularly multi-storey housing is not fully accessible due to Building Code regulations of the Building Act 2004 and other legislation. Disabled Persons Assembly (NZ) Inc identified in their submission that "the main challenge to housing accessibility arises from orienting spatial planning away from planning for urban sprawl towards the creation of more compact communities instead."¹⁴⁴ The Spatial Plan focuses on providing greater housing choice to meet the diverse needs of the community. The exemplar projects that are proposed for the Priority Areas will be essential for demonstrating the design outcomes sought from targeted

¹⁴² GCSP (2023) page 67.

¹⁴³ Livingston and Associates (2021) Housing Demand and Need in Greater Christchurch. <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Housing-Demand-and-Need-in-Greater-Christchurch-prepared-by-Livingston-and-Associates-2021-Report.pdf>

¹⁴⁴ Submitter 302 - Disabled Persons Assembly (NZ) Inc

intensification, including universal design accessibility standards for multi-storey development. The Joint Housing Action Plan in the Joint Work Programme has the purpose of creating a housing action plan that ensures the entire housing continuum is working effectively to provide affordable housing choice and diversity. The Joint Housing Action Plan is the appropriate action/initiative for the Partnership to consider how best to incentivise universal design standards in Greater Christchurch. The recommendation that councils conduct extensive barrier free accessibility audits should be taken under advisement for future strategic work by local authorities and in particular Priority Areas.

Various submission points drew attention to the ageing population of Greater Christchurch. The projected change in age structure by broad age groups is shown by Figure 10 of the draft Spatial Plan and below.

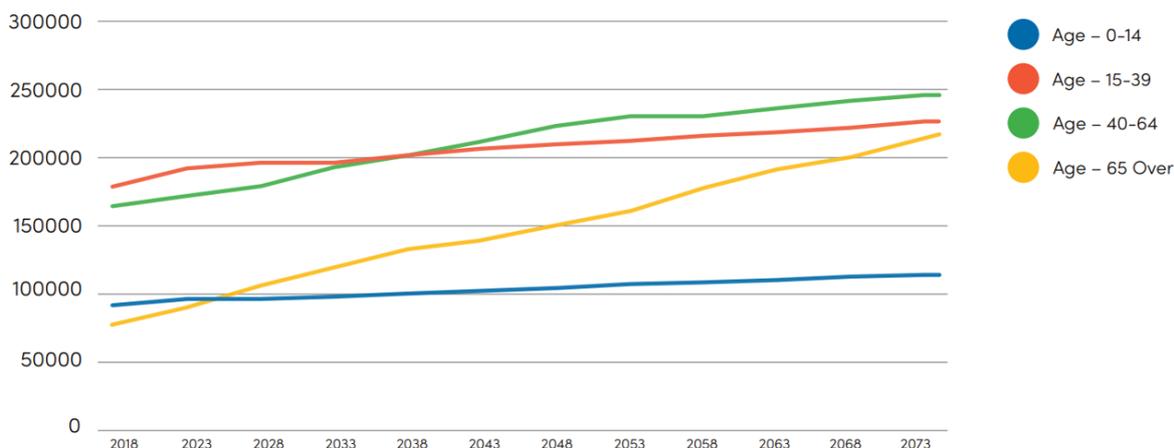


Figure 7: Projected Population growth by age group in Greater Christchurch as shown in the draft Spatial Plan

Some submitters broadly considered that future housing in Greater Christchurch should appropriately accommodate all age groups and recognise that as the population ages a range of housing types and models of housing will be needed. They identified that alternative models of housing for aged persons, including retirement villages (distinguishing between comprehensive care retirement villages and lifestyle villages) were insufficiently considered in the draft Spatial Plan. Submitters identified that retirement villages are part of housing choice and are required to be developed at a sufficient scale to be commercially viable and as such typically require large sites which are not readily achievable in brownfield areas. Submitters considered that the desired pattern of growth within the draft Spatial Plan does not provide for other forms of housing such as retirement villages and that housing choice is overly predicated on housing typology changes.

Ara Poutama considers that aside from providing a range of housing densities, typologies, and social and affordable housing, the Spatial Plan should recognise the full range of residential activities that are undertaken including those with associated rehabilitation, reintegration and support services (provided by Ara Poutama and other housing providers).¹⁴⁵ Ara Poutama operates residential accommodation to assist people with their rehabilitation, transition and reintegration back into the community and as such, submission points on residential accommodation facilities operated by Ara Poutama were coded to housing provision.

The NPS-UD distinguishes between types (includes standalone dwellings and attached dwellings at the very least) and forms of housing (such as for lower-cost housing, papakāinga, and seasonal worker or student

¹⁴⁵ Submitter 173

accommodation). The draft Spatial Plan makes reference to ‘models of community living’ so as to provide housing options that allow people to stay in their communities through different stages of their lives and live with their whānau and friends. There is limited reference to other forms of housing in the broadest sense in the draft Spatial Plan despite providing direction on housing choice. The draft Spatial Plan includes provision for kāinga nohoanga as an overarching direction, specifically under Direction 4.1 and as a key move. The draft Spatial Plan does not limit the potential for innovative housing options and alternative forms of housing in Greater Christchurch. The draft Spatial Plan should specifically recognise that other forms of housing and their associated services will form an important component of housing choice however this is more appropriate for the Joint Housing Action Plan to consider in detail.

Various submitters considered that the draft Spatial Plan should recognise and address the full range of housing needs, including provision for LLRZ development. One submitter outlined that there is a “demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector” and that “there is a strong unmet demand for larger family homes with room for a pool or similar.” The submitter outlines how this type of development represents a part of housing choice. The submitter considers that the draft Spatial Plan should not apply Policy 6.3.9 of the CRPS as it limits rural residential development and that the LLRZ should enable housing on site sizes of 1,000m².

The CRPS states that rural residential activities means residential units outside the identified Greenfield Priority Areas and Future Development Areas at an average density of between 1 and 2 households per hectare (or 5,000m² to 10,000m²). Many rural-residential sites identified by councils through Policy 6.3.9 have been subsequently re-zoned / up-zoned to be more urban. The NPS-HPL also seeks to limit lifestyle developments on highly productive land. However, this is not the full range of housing choice. Greenfield development with a range of site sizes (including up to 1,000m²) is not precluded by district plans and is able to proceed through rezoning requests to district plans and other processes.

The draft Spatial Plan states that desired pattern of growth in Greater Christchurch that best delivers on the six opportunities is to focus household and business growth through greater intensification in urban and town centres, and along public transport corridors. The nature of development will provide a range of site sizes around this pattern and district plans do not preclude large lot or larger urban development. Although rural residential development forms part of housing choice in Greater Christchurch, it is actively discouraged by the NPS-HPL (on highly productive land), not precluded in district plans, and is not aligned with the desired pattern of growth within the draft Spatial Plan.

Overall, the draft Spatial Plan does not fully consider the range of housing options that exists and will continue to exist in Greater Christchurch and is overly predicated on housing typology changes. The Joint Housing Action Plan in the Joint Work Programme should provide greater consideration of the broad spectrum of housing choice than is currently provided for in the Spatial Plan, and options to improve housing affordability. The draft Spatial Plan at the highest level focuses on providing broad direction and encouraging a positive shift in urban form to achieve the desired pattern of growth. Subsequent processes, including the Joint Work Programme, are more appropriate and suitable for addressing the opportunities of the Spatial Plan at the level of detail needed for a considered approach (see Figure 5 of the draft Spatial Plan). The Spatial Plan should acknowledge the range of housing options that forms part of housing choice.

Recommendations:

- a) The draft Spatial Plan should be amended as follows on page 72:

Housing need in Greater Christchurch, **including social and affordable housing**, will be further addressed through the development of a joint ~~social and affordable~~ housing action plan.

- b) The draft Spatial Plan should be amended as follows on page 70:

...However, to do this across a spectrum of housing choice and demand, the intensification focus needs to be combined with continuing to provide for **diverse forms of housing and** some greenfield areas in appropriate locations.

- c) Insert new section after 'Greenfield' (page 72) titled 'Specific Forms and Alternative Approaches to Housing' as follows:

Specific Forms and Alternative Approaches to Housing

Specific forms of housing and alternative approaches to housing are part of housing choice. They can provide for a range of preferred lifestyle options, respond to deficiencies or particular demand in the housing market, target those with the greatest housing need or deliver housing through innovative and novel approaches. They span the housing continuum from social housing through to private housing in the open market. They can offer greater diversity of housing typologies, tenures and price points.

Consideration of how specific forms of housing and alternative approaches to delivering housing can support greater housing choice in Greater Christchurch will be further addressed through the development of a Joint Housing Action Plan.

4.5.7 Kāinga Nohoanga

Submissions

There were no specific questions asked on the *Have Your Say* submission form relating to the draft Spatial Plan direction to 'Enable prosperous development of Kāinga Nohoanga on Māori land and within urban areas'.

Overall, 11 submission points were coded as specifically relating to 'Kāinga Nohoanga'. There was support from submitters in enabling Kāinga Nohoanga with supporting infrastructure. However, many of the submission points questioned the direction and focus on enabling Kāinga Nohoanga. Primarily, the concern was around the view that this was culturally divisive and that the development of the Greater Christchurch is one community.

Response to submissions

For the most part the submission points opposed to the direction around enabling Kāinga Nohoanga fail to recognise Te Tiriti o Waitangi, and the commitment of the Crown to achieve equitable outcomes for Māori. The draft Spatial Plan acknowledges Te Tiriti o Waitangi along with the rangatiratanga of mana whenua and

commits to those priorities and expectations which have been identified through the Tiriti Partnership. These include enabling and supporting Kāinga nohoanga on Māori Reserves and within urban areas.

The draft Spatial Plan outlines this commitment through Direction 4.1 of the draft Spatial Plan to enable the prosperous development of kāinga nohoanga on Māori Reserve Land and within urban areas. This is also reflected as an overarching direction and Key Move of the draft Spatial Plan.

The prosperous development of kāinga nohoanga will potentially involve a range of housing typologies and a mix of uses that will enable mana whenua to live in accordance with customs and traditions, including inter-generational living. This will support achievement of the definition of a well-functioning environment under the NPS-UD¹⁴⁶ which is concerned with variety in housing and enabling Māori to express their cultural traditions and norms. Enabling the prosperous development of kāinga nohoanga is therefore essential to achieving well-functioning urban environment and meeting the requirements the NPS-UD.

How development of Kāinga Nohoanga will occur will in part be informed by the Kāinga Nohoanga Strategy being led by mana whenua. However, the draft Spatial Plan identifies that strong partnerships and joint planning is required including partnering with mana whenua to identify and respond to infrastructure needs for Māori Reserve Land, and to support mana whenua with upgrades to infrastructure where needed to enable kāinga nohoanga.

Recommendations:

No changes are recommended in relation to enabling Kāinga Nohoanga.

4.5.8 Connected Neighbourhoods

Submissions

No specific questions were asked on the *Have Your Say* submission form in relation to the Connected Neighbourhoods of the draft Spatial Plan.

Overall, 21 submission points were coded as relating to ‘connected neighbourhoods’, the majority of which were opposed to the concept. However, the reference in most submission points was to a ‘15-minute neighbourhood’. This term appeared in the Huihui engagement process, mostly used in a negative sense. This is because concept of a ‘15-minute Neighbourhood’ has become associated with the idea that it keeps people locked down and controlled, and restricts the freedom of movement. As a result of the feedback received through Huihui Mai, the draft Spatial Plan amended the term ‘15-minute neighbourhood’ to try to reflect what the idea and direction of the Spatial Plan is aiming to achieve.

There were submissions in directly in support of the idea of improved public transport and enhanced accessibility to services including education and health, without the need for a car.

Response to submissions

The ‘Connected Neighbourhood’ concept in the draft Spatial Plan reflects the idea of people living in urban centres having access to services that can be reached through travel modes other than the private car,

¹⁴⁶ National Policy Statement for Urban Development, Policy 1(a)(ii)

including walking, cycling, and public transport. These modes have less impact on the environment, while improving people's health and wellbeing.

The idea is not to restrict people's movements, but to improve the options available in accessing to day to day needs and services such as:

- Shopping centres
- Local health facilities
- Employment
- Education
- Public transport
- Cycle networks
- Recreation areas
- Green spaces

The idea of connected neighbourhoods reflects the interrelationship between diverse housing options, recreation areas, green spaces, public transport and cycle networks. This relates to the creation of transport choices that reduce the need for car travel, reflecting the commitment to reducing carbon emissions and other environmental impacts. However, we recognise that private vehicles are still required for people in their daily life as not all needs can be met (social events, services, employment, recreation and education and so forth) in every neighbourhood.

We support the idea of improving access to daily needs close to where people live, thereby reducing the need for private vehicle use, and on that basis we believe that the concept of 'Connected Neighbourhoods should remain in the draft Spatial Plan.

Recommendations:

We do not recommend any changes to the draft Spatial Plan in relation to the submission above. However, we note that recommendations have been made in the Intensification Section that imply some changes to the Vibrant Communities section (Page 73) of the draft Spatial Plan.

4.6 Opportunity 5 – Provide spaces for businesses and the economy to prosper in a low carbon future

No specific questions were included on the *Have Your Say* submission form in relation to Opportunity 5.

Overall, 45 submission points were coded as relating to Opportunity 5 and related directions.

Table 10 – Summary of coded submission points on Opportunity 5

Position	Number of Responses	% of Total Responses
Support	34	75.56%
Opposed	0	0
Not Stated	11	24.44%

The majority of submissions were in support (75.56%), while the remaining submission points did not specify if they were in support or opposition. None of the submission points coded to Opportunity 5 were specifically in opposition.

The main themes for amendments that came through these submissions are as follows:

- *Business Capacity Assessment – sufficient future development capacity*
- *Appropriately acknowledging strategic infrastructure (port, airport, prisons, electricity networks and telecommunications) within the spatial plan*
- *The strengthened network of urban and town centre*
- *Recognising the role of research and primary production activities within Greater Christchurch, and*
- *Additional Key Terms*

Submissions on Business Capacity Assessment are addressed in Section 4.8.5. Submissions related to the protection of Strategic Infrastructure are addressed in Section 4.10.1.

Response to submissions

4.6.1 The strengthened network of urban and town centres

The draft Spatial Plan includes a table of urban and town centres on pages 35 to 37, which outlines centre types, their purpose, and locations.

New category of Key Transport, Energy and Employment Node (KTEEN)

The CIAL submission seeks the inclusion of a new type of centre: ‘Key Transport, Energy and Employment Node’ (KTEEN) for the Christchurch Airport Campus, stating that it is critical that the Spatial Plan contains appropriate protection of the Christchurch Airport now and into the future, so that it can continue to facilitate the social, environmental and economic prosperity of Greater Christchurch and the South Island.

The draft Spatial Plan identifies Christchurch Airport / Russley as a ‘Key Business Area’ including on Map 13. The purpose of a Key Business Area is described as *providing space for industrial activity and employment primarily; with freight accessibility, as well as accessibility for workers via public and active modes of transport,*

being important. Other locations listed included South of the Central City, Southern industrial spine (including iZone), Port of Lyttelton and other business areas.

The role of the airport as Strategic Infrastructure is recognised on Map 9, and the importance of networks to serve the airport are described in section 6.3: *“This means ensuring that the strategic road and rail connections to key freight and logistics hubs, including the Port of Lyttelton, Christchurch Airport and the inland ports at Rolleston and Woolston, are not compromised by development and uncontrolled growth in travel demands on the network.”*

The purpose statement for Key Business Areas and the references to the airport as Strategic Infrastructure incorporates the outcome sought by CIAL. Further, on the basis of CIAL’s logic, other locations listed as Key Business Areas could arguably be considered KTEENS. Consequently, we do not consider it necessary for the Airport to have a new, bespoke category of centre and do not recommend the inclusion of a new KTEEN category.

Additional locations

One submitter¹⁴⁷ noted that Prebbleton’s commercial area has been zoned as a Town Centre Zone in the now partially operative Selwyn District Plan, submitting that Prebbleton should be identified within the network of urban and town centres in the Spatial Plan as either a major town or alternatively, a locally important urban centre and town like Lincoln. In our view, Prebbleton is akin to locations listed as locally important urban centres and towns, and we therefore recommend that it is included in the locations listed.

One submitter noted¹⁴⁸ that Wigram should be listed as a locally important urban centre and town like Halswell, Shirley and Linwood. However, Halswell, Shirley and Linwood are major retail destinations and employment centres, whereas Wigram is a neighbourhood centre primarily serving the immediately surrounding suburbs. There are many similar neighbourhood centres that are not listed in the draft Spatial Plan for the same reason, for example, Barrington, New Brighton and Sumner. Therefore, we do not recommend the inclusion of Wigram.

Lyttelton Port Company¹⁴⁹ sought that their City Depot Inland Port should be shown on Map 13 – *Key employment areas and economic assets*. We agree that this should be included.

Recommendations:

- a) Add **Prebbleton** to the list of locations of ‘Locally important urban centres and towns’ on Page 35 and identify Prebbleton on Map 2 and Map 14 as a ‘Locally important urban centres and towns’ on pages 29 and 79.
- b) Amend Map 13, Page 76, to show the **LPC City Depot inland port**.

4.6.2 Recognising the role of Research and Primary Production Activities

AgResearch Limited and PorkNZ submitted that research centres and farms, as well as primary production activities, are located within Greater Christchurch, and that urban growth can impact these land uses and rural

¹⁴⁷ Submitter 327 - Birchs Village Limited and WDL Enterprises Limited

¹⁴⁸ Submitter 68 - Yuhui Wang

¹⁴⁹ Submitter 332 - Lyttelton Port Company

communities within Greater Christchurch. PorkNZ state that the geography of the Canterbury Plains means that in general from east to west, soils become lighter, stonier and more free-draining. Farming on lighter, stonier and more free-draining soils requires more inputs, such as fertiliser and irrigation water, to obtain the same level production as on good quality soils. These additional inputs not only increase the cost of production, but also impact the environmental footprint of farming. This correlation between urban growth and the environmental impacts of rural land uses has not been historically well-recognised in land use planning under the Resource Management Act in Canterbury. In our view, greater consideration of these impacts is required to ensure we do not compromise primary production or the economy.

The Greater Hornby Residents Association¹⁵⁰ submission raises concerns about quarry dust levels, and the use of setback distances and other mitigation measures. The Aggregate and Quarry Association¹⁵¹ submission raises concern that the draft Spatial Plan does not address the need for new quarries or where they will be located. They submit that, to future proof Greater Christchurch, land for existing and future aggregate extraction activities must be adequately identified and protected from encroachment of non-compatible land uses and recommends that councils map potential quarry areas.

The environmental effects of quarrying activities are managed primarily through regional and district plans and the resource consent process. The draft Spatial Plan¹⁵² signals that the review of the regional planning framework will continue to consider, and direct, how to manage urban growth in balance with activities that occur in the rural environment. The need for future greenfield development to be located to minimise its impact on existing permitted or consented primary production activities is reflected in the principles for successful future greenfield development¹⁵³. In response to these submissions, we consider it appropriate to signal in the Spatial Plan the important role quarries play in urban development, and that consideration needs to be given to their future operation and function through regional and district planning processes. Additional wording is recommended to this effect.

We acknowledge the importance of research and primary production, including quarries, to the Greater Christchurch economy. Opportunity 5 does highlight the need to *Provide space for business and the economy to prosper in a low carbon future*. However, Opportunity 5 and the supporting directions do not address the above issues raised by submitters. Therefore, the additional explanatory text and new Directions below are recommended.

Recommendations:

- a) Insert additional paragraph on Page 75 as follows:

Greater Christchurch contains a number and range of tertiary and research institutions of strategic importance from a local and national perspective. Their retention, protection and continued operation is of regional and national economic importance.

- b) Amend second bullet point under context on page 75 as follows:

¹⁵⁰ Submitter 39

¹⁵¹ Submitter 223

¹⁵² dSP, Page 25

¹⁵³ dSP, page 72, ref. point 4

Hubs of tertiary and research institutions are found in Christchurch's Central City, including the Ara Institute of Canterbury, the tertiary teaching hospital and the health precinct; and at the University of Canterbury campus in Riccarton, and the Lincoln University and various research campuses and farms in and near Lincoln.

- c) Insert a new direction 5.4 on pages 31, 75 and 81 and explanation on page 81 as follows:

5.4 Urban growth occurs in locations that do not compromise the ability of primary production activities to expand or change, including adapting to a lower emissions economy.

Explanation:

Greater Christchurch is a business and research hub for primary production across Canterbury and the South Island. Primary production is one of the key drivers of our economy and employment. A strong agricultural economy supports growth and development in the rest of the economy due to its linkages with research, manufacturing and transport. Quarries also play an important role in urban growth and development. Consideration needs to be given to their location, operation, and function, to ensure a reliable and affordable future supply of aggregates and that adverse impacts on communities and the environment, including potential effects on groundwater and drinking water sources, can be appropriately managed. This includes the rehabilitation of quarry sites once extraction ceases.

Primary production activities are located within Greater Christchurch, and urban growth can impact these land uses and rural communities. Some of these effects can be positive, bringing new people and amenities to rural areas. However, there are also adverse effects of urban growth which need to be managed.

There is need for primary production activities to be able to expand or change in response to new markets and new issues, including transforming to a lower emissions economy. A growing primary production industry creates opportunities for other industries to prosper.

- d) Insert a new direction 5.5 on pages 31, 75 and 81 and explanation on page 81 as follows:

5.5 Urban Growth occurs in locations and patterns that protects strategic regionally and nationally important tertiary institutes.

Explanation:

Greater Christchurch has significant tertiary education and research capability. This includes four tertiary institutes and several research institutes, including six of the seven Crown Research Institutes in Aotearoa New Zealand.

There are more than 25,000 tertiary students across the four tertiary campuses in Greater Christchurch. The majority of these institutions are located outside of the significant urban centres of Greater Christchurch, and may be impacted by urban growth. Improved public transport links to campuses will enhance integration with Greater Christchurch.

Tertiary and research institutes need to be provided for and protected as these institutions are providing the skilled workers of the future as well as key drivers creating and adopting innovations, and providing more sustainable ways for our communities and businesses to operate.

4.6.3 Additional Key Terms

Lyttelton Port Company (LPC)¹⁵⁴ submitted that the list of key terms at the beginning of the draft Spatial Plan is not exhaustive. For example, “infrastructure”, “renewable energy”, “freight network” and other relevant terms used in the draft Spatial Plan are not included. LPC considers that the list of key terms should be more comprehensive, specifically in accordance with the matters outlined in its submission.

The draft Spatial Plan only included Key Terms that required a definition because they were not defined elsewhere or had a different meaning to the ordinary meaning. We consider that infrastructure, renewable energy and freight network can be easily understood. We do not consider it necessary to include definitions for Infrastructure, Renewable Energy or Freight Network.

Recommendations:

We do not recommend any changes.

¹⁵⁴ Submitter 332 - Lyttelton Port Company

4.7 Opportunity 6 – Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities

Submissions

Two questions were asked on the *Have Your Say* submission form relating to the transport system and corridors, in particular the public transport system and the location of transport corridors. The questions and the response to these are outlined below:

280 submitters that used the online form answered the question “Do you support the improved public transport system proposed in the draft Spatial Plan?”:

287 submitters that used the online form answered the question “Do you agree that we should focus future development and investment around urban centres and transport corridors?”

Table 11 – Response to *Have Your Say* Question 1 “Do you support the improved public transport system proposed in the draft Spatial Plan?”:

Position	Number of Responses	% of Total Responses
Support	166	59.29%
Opposed	83	29.64%
Unsure	31	11.07%

Table 12 – Response to *Have Your Say* Question 2: “Do you agree that we should focus future development and investment around urban centres and transport corridors?”

Position	Number of Responses	% of Total Responses
Support	189	65.85%
Opposed	75	26.13%
Unsure	23	8.01%

Overall, submitters supported this Opportunity, providing many comments and suggestions regarding access and transport options for specific parts of the city. Generally, submitters saw value in more and better transport options for people and goods, and support reducing emissions through transport.

Key themes from the submissions were:

- Alternative options or approaches for MRT
- Region-wide public transport improvements
- District connections
- Regional rail connections
- Walking, cycling, micro-mobility and other modes of transport
- Transporting freight

Response to submissions

4.7.1 *Alternative options or approaches for MRT*

Many submitters commented on aspects of the Mass Rapid Transit (MRT) system, suggesting ideas to improve or change the proposal in the draft Spatial Plan.

While the draft Spatial Plan provides the proposed route and signals what the urban form along the corridor would look like, detailed analysis of the MRT proposal is not included. However, the MRT Indicative Business Case (IBC) – completed alongside the Spatial Plan has considered the future role of MRT in Greater Christchurch, and assessed many scenarios and options to present the preferred option that is in the draft Spatial Plan.

Most comments from submitters related to either the mode or route of the proposed MRT system.

Amongst comments on the mode, suggestions included preferences for heavy rail, light rail, trams and buses. Through the MRT IBC process, a range of options were assessed to identify which form of rapid transit would best meet the desired outcomes. Nine mode options were considered in a long list screening process:

- Standard bus
- Double Decker bus
- Articulated or Bi-Articulated bus
- Trackless tram
- Light rail
- Light metro
- Suburban rail
- Monorail
- Gondolas

The Mode Assessment process scored these options based on capacity, ability to stimulate growth, travel time, ability to attract new customers, costs, resilience and adaptability, and complexity. The assessment determined that both Light Rail and Bi-articulated Bus solutions are the preferred ways forward in terms of mode technology for this rapid transit system. The next step for MRT is to complete a detailed business case, to complete more detailed analysis and planning, and to narrow down a single preferred mode.

Comments on the MRT route were generally about either places seen to be neglected by the MRT route, or suggestions to make use of different, existing routes. Most common was the suggestion to use the existing heavy rail network. However, this is not well aligned to the outcomes sought by the MRT system for a number of reasons:

- The existing railway line does not go through the central city. A new station/s would be needed on the existing line as close to the central city as possible (for example near Riccarton Road or Colombo Street/Moorhouse Avenue), and passengers would still need to walk or transfer to a bus to get to the central city. Bringing rail into the central city would require a tunnel or trench.
- The current rail infrastructure limits the number of trains that can operate. Most of the railway line between Rolleston and Addington, and the entire line between Addington and Rangiora, is single-tracked. This means trains can only go in one direction at a time, limiting the number of services that can be run. Other infrastructure, such as busy level crossings and the train signalling system, place further limits on the number and reliability of services.
- The existing railway lines are already busy with the critical and growing task of moving freight. High freight demand between the inland port (Rolleston) and Lyttelton Port makes operating a regular and frequent passenger train impossible on the current infrastructure. Moving this freight to the road network to 'make room' for passenger trains would create significant congestion and increased emissions.
- The existing railway lines are not where most people are now or where they will live/work/play in the future. Rail corridors are not necessarily well-suited to encouraging land uses around them that are city-shaping and improve liveability. To succeed the chosen solution needs to lead to more vibrant neighbourhoods and key centres and encourage population growth along the entire corridor.

While heavy rail is not the best option for a 'turn-up-and-go' service of this sort, this does not mean passenger rail will not happen in Canterbury in the future. We note that heavy rail will continue to play an important role in moving freight, a role that is important to grow in the future to support our economy and a healthy environment.

Many submitters supported the approach in the draft Spatial Plan but suggested additional areas in Christchurch that should be served by the MRT system. This included the Airport, University, eastern Suburbs, and Lyttelton. The MRT IBC did consider a range of MRT stop locations, as well as supplementary routes.

A significant driver of the MRT system is to direct growth and to focus urban development. The MRT route itself is not intended to serve every community, but the wider public transport system (inclusive of MRT, buses and ferries) can support the wide range of communities in Christchurch.

While the locations suggested by submitters are not directly connected to the MRT route, they will still be accessible by public transport and other multi-modal connections. An airport link was considered in the IBC and assessed under a range of criteria. The multi-criteria analysis found that none of the options were considered to provide overwhelming support across the investment objectives (ability to accommodate growth and support high density, improve access to jobs, education and social opportunities, and to reduce emissions), and the airport is considered well-served by existing and future committed public transport routes. In addition, the preferred MRT option reflects a route that will connect with bus services and other modes to enable quick and reliable connections to other locations mentioned by submitters (University, eastern suburbs and Lyttleton).

A smaller proportion of submitters were unsupportive of the proposed MRT system, commonly citing the need to have private vehicle access, that electrification would resolve key transport challenges, and the low usage of existing public transport in Christchurch as key reasons. As public transport infrastructure and services improve, public transport is likely to be a more feasible travel option for more people and increase patronage over time. In addition, the draft Spatial Plan recognises that many trips will still be taken by private vehicle, but the strategic direction enables more choice and enables more people to live close to key destinations.

Full detail and analysis can be found in the MRT IBC, available publicly online¹⁵⁵.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions. The detailed design and delivery of MRT is a separate process (though carefully integrated with the Spatial Plan), and further business case work, and community engagement should satisfy the issues raised by submitters.

4.7.2 Region-wide public transport improvements

Various submitters commented on the need to focus on improving existing public transport services, and ensuring there are reliable and accessible routes for everyone, before focussing on the new MRT system. The draft Spatial Plan aligns with this and highlights that an important first step to improving Greater Christchurch's public transport network is to accelerate the implementation of planned improvements to the existing bus network, as set out in the Greater Christchurch Public Transport Futures (PT Futures) programme.

The PT Futures Programme involves the development of two business cases that together explore an investment programme aimed at increasing the mode share of the public transport network in Greater Christchurch.

The first business case delivered in 2018 (Greater Christchurch Public Transport Combined Business Case) recommended a programme of improvements to increase the uptake of public transport over the next decade. The second business case is the MRT IBC.

¹⁵⁵ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/HuiHui-Mai/Greater-Christchurch-Mass-Rapid-Transit-Indicative-Business-Case-Final-Draft.pdf>

The first PT Futures business case recommended a programme of integrated interventions ranging from higher frequency services, realignment of routes and new routes. The seven key interventions are detailed below:

1. Enhance the Inner Core Routes (increase frequency to 7.5-minute peak and 10-minute off-peak for Orbiter, 1, 3, 5 and 7 routes)
2. Enhance the Secondary Core Routes (Increased frequency and directness on routes 17, 28 and 29)
3. Provide Direct Connections (new direct services from Lincoln to the city centre and enhanced frequencies on Rolleston, Rangiora and Kaiapoi direct services)
4. Branch Out from Core Routes (increase frequency and branch the routes outside the orbiter, new routes to connect Key Activity Centres and the city centre)
5. Expand the Frequent Network (increase frequency and directness of routes 60 and 80, rerouting routes 60 and 80 to connect new growth areas with the city centre and key activity centres)
6. Enhance Connector Services (re-route connector services to provide more direct connections, connecting with high frequent routes at key locations, extend Route 125 to provide an outer half-orbiter function to distribute trips across the outer parts of the city, straighten the 140 route to provide a spine through the industrial employment area and increase its frequency)
7. Multi-Modal Network Connections (enhance the opportunities to transfer from various modes to the bus network)

The business case also identifies four key areas of infrastructure enhancements, including bus priority lanes, particularly for Inner Core Routes, greater use of technology and real-time information, bus stop enhancements to improve customer comfort, safety and security, and multi-modal infrastructure to support last-mile connections.

Some submitters commented on a few specific areas in Christchurch perceived to have poor existing public transport accessibility and sought greater improvements for those areas. This included:

- Eastern Suburbs
- Within the districts
- Lyttleton

These areas are covered by the PT Futures enhancements and should expect increased frequency and connectivity in the future, despite not being connected to the MRT corridor.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions. Delivery of PT Futures is a separate process and work-to-date adequately responds to the issues raised by submitters above.

4.7.3 District connections

Various submitters commented on the importance of providing reliable and frequent services to the districts, particularly main centres of Rolleston and Rangiora. Many questioned why the core MRT

system would not be extended out to Rolleston and Rangiora. The MRT IBC considers the full network and builds on existing public transport networks and services. The MRT system would include further enhancements to connect to the districts (as part of PT Futures). These additional improvements include:

- **Direct Bus Services:** The Direct Bus Services travel non-stop between the districts and the city, with the route travelled depending on traffic conditions. These Direct Bus services to the district will be enhanced by increasing frequencies to 15-minute peaks and 30 minute off-peak.
- **Standard and Express Bus Services:** Standard bus services operate within the district and connect the districts to the city via fixed routes and stop at each pickup/drop-off location. During peak periods these standard bus services also offer an Express Service which follow the fixed routes but reduce the number of pickup and drop off points. These bus services will be optimised in context of the MRT offering, to ensure suitable internal district connectivity (Intra-district) and connectivity to the MRT services. Connecting to the MRT stations, initially at Church Corner and Papanui and ultimately at Hornby and Belfast, is essential in order to provide a smooth transfer onto the MRT system.
- **District Park and Ride Facilities:** Park and Ride facilities will be enhanced and optimised to ensure they are correctly scaled, configured and spatially positioned to work effectively alongside MRT. Moving beyond this IBC, consideration should also be given to referencing these as 'Multimodal Interchanges' to reflect the wider function these sites offer, in connecting transfer facilities to PT and MRT from a variety of modes including cars, bikes and scooters.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions. Delivery of PT Futures is a separate process and work-to-date adequately responds to the issues raised by submitters above.

4.7.4 Regional rail connections

Heavy rail services beyond the Greater Christchurch area were frequently mentioned. This is technically not in the scope of the draft Spatial Plan as it relates to connections across the South Island. Submitters sought alternative options to private vehicle travel for longer trips around the region. The most common corridors that were mentioned are Christchurch to Ashburton, and connections to Rangiora and Rolleston.

Inter-regional rail has been considered by Central Government, with a Select Committee inquiry exploring what the future could hold for inter-regional passenger rail in New Zealand concluding in June 2023. The intention was to gain insight into the economic, environmental, and social factors affecting the viability of inter-regional passenger services in this country. The report recommended four scoping studies be progressed for inter-regional rail passenger services, however no South Island corridors were recommended. Environment Canterbury recently presented options to progress development of passenger rail services in Canterbury. Further work will be subject to funding in the Long-Term Plan and prioritisation in the Regional Land Transport Plan.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

4.7.5 Walking, cycling, micro-mobility and other modes of transport

Opportunity 6 covers broad direction for transport and accessibility, including to protect the freight network, improve accessibility to Māori Reserve Land, enable walking cycling and micro-mobility, influence travel demand, and improve public transport.

Some submitters commented on the role of active modes, micro-mobility and private vehicles, with varying comments relating to:

- Support of and wanting to see more emphasis on cycling.
- Opposition to cycling infrastructure taking road space from cars and parking.

The draft Spatial Plan is aligned with national direction, as provided in the Government Policy Statement on Housing and Urban Development, and the Government Policy Statement Land Transport which clearly signals that improving access to key destinations by walking, cycling and public transport is important for enabling thriving and resilient places. The draft Spatial Plan reflects this direction at a sub-regional level and highlights the need to reduce private vehicle dependence.

We note that some important cycle connections in the Selwyn District are missing from the strategic cycleways network in Map 15. There are key connections between destinations in Selwyn, likely to serve a range of trips for varied purposes. The key routes are:

- Lincoln to Rolleston cycle way
- Rolleston to West Melton cycleway
- Springston and Lincoln cycle path

The Disabled Persons Assembly¹⁵⁶ and the Waimakariri Youth Council¹⁵⁷ submitted that the overall opportunity needs to better reflect accessibility and the wide range of needs that the community has. New Zealand has established a Disability Strategy to guide the work of government agencies on disability issues. Outcome 5 of the strategy (accessibility) specifically calls for access to all places, services and information with ease and dignity. This means everyone can get from one place to another easily and safely, that people feel safe taking public transport to get around and are treated well when choosing to use public transport. Disabled people's needs also need to be adequately considered when planning for new services.

Recommendations:

- a) Amend Opportunity 6 on page 83 as suggested by Disabled Persons Assembly, as follows:

“Prioritise sustainable **and accessible** transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities”.

¹⁵⁶ Submitter 302

¹⁵⁷ Submitter 335

b) Amend Map 15 to show three strategic cycleways in Selwyn District

- Lincoln to Rolleston cycleway
- Rolleston to West Melton cycleway
- Springston and Lincoln cycle path

4.7.6 Transporting freight

A submission by Lyttelton Port Company Limited¹⁵⁸ reinforced the importance of freight, as reflected by direction 6.5 Protect the effective operation of the freight network. The submission proposed that the draft Spatial Plan should clearly recognise the significant infrastructure and transport networks that support the Greater Christchurch area, including the Port and the Inland Ports, as well as the freight connections between them.

While the State Highway and heavy rail network (being key networks for freight) are highlighted in the transport network, there is no specific identification of the key freight corridors. Christchurch is an economic hub of Canterbury and the South Island. Freight volumes are expected to increase and continue to utilise the road and rail network. The Port itself anticipates increasing cargo volumes and will continue to handle a wide range of cargo for many customers. Ensuring that freight movements are safe and efficient is of significance to the sub-region and is closely related and interdependent with many other outcomes of the draft Spatial Plan.

Recommendations:

- a) Change Map 15, Page 84, to include key freight routes as outlined in the image below (from Lyttelton Port Company Limited submission).



¹⁵⁸ Submitter 332

4.8 Development Capacity

The NPS-UD states that development capacity means the capacity of land to be developed for housing or for business use; based on the zoning, objectives, policies, rules and overlays that apply in the relevant proposed and operative RMA planning documents, and the provision of adequate development infrastructure to support the development of land for housing or business use. The draft Spatial Plan as an FDS has the stated purpose to promote long-term strategic planning by setting out how a local authority intends to provide at least sufficient development capacity over the next 30 years to meet expected demand. The HCA and BCA are required by the NPS-UD and provide the most up-to-date information on the demand and supply of housing and business land in Greater Christchurch. The HCA and BCA quantify the development capacity that is sufficient to meet expected demand for housing and for business land in the short term, medium term, and long term. The draft Spatial Plan as an FDS is informed by the most recent HCA and BCA and includes the calculations of sufficiency from the HCA and BCA in the draft Spatial Plan in tables 2,3 and 4. The draft Spatial Plan also includes specific direction on providing sufficient development capacity under Opportunity 4 through Direction 4.2 and Opportunity 5 under Direction 5.1.

Submission points were coded separately to development capacity for housing and business land.

Response to submissions

4.8.1 Housing Development Capacity

44 submission points were coded to housing development capacity. The vast majority of submission points coded to housing development capacity were from the development sector. The submission points coded to housing development capacity do not include the 14 submissions points that were coded to the evidence base in respect of the draft Spatial Plan meeting the requirements of an FDS in relation to clause 3.13(2)(a) NPS-UD to spatially identifying the broad locations for long-term development capacity.

The submission points received in relation to housing development capacity can be broadly summarised as follows:

- Various submissions contend that the demand projections are understated, with respect to the amount of growth projected, type, and location. Broadly there is a view from the development sector that there will be more demand for standalone houses in greenfield areas and less demand for attached dwellings in brownfield areas.
- Various submissions were critical of the capacity assessments, with respect to both the type and amount of capacity assessed. Some submissions held a position that the capacity estimates are inaccurate, and that achievable development potential is lower in the greenfield and brownfield areas.
- Various submissions contend that that there is a larger shortfall in the long term than is shown in the draft Spatial Plan because demand is higher and capacity is lower than

estimated in the HCA. Some submissions held a position that there may be mismatches between demand for locations and types of dwellings within the urban environment.

4.8.2 Housing Demand

Various submission points sought clarification on the demand modelling that had been undertaken and questioned how recent this modelling was undertaken. The NPS-UD requires that the HCA be prepared and made publicly available every three years. Clause 3.24 sets out the requirements in terms of assessing housing demand.

Expected demand for housing is based principally on Statistics New Zealand's (Stats NZ) population estimates and projections and the associated assumptions. This underpins the most recent HCA which has in turn informed the draft Spatial Plan. The assessment findings of the HCA are based on the best available information and models at that point in time, which for the HCA was March 2023. The NPS-UD is fairly prescriptive as to how the HCA is to be undertaken. The HCA provides an in-depth explanation on the process for assessing housing demand in the short term, medium term, and long term. In summary, the process involved the following:

- population projections as the starting point;
- an assessment on the range of population projections to identify the 'most likely projection' based on a comparison of the recent growth observed in each area (over the last five years) as compared to the projections;
- a rebasing of the most likely projections using the best-known population point as a base year;
- converting the population to households using Stats NZ average household size projection;
- determining the demand for dwellings from the expected number of households as there is close to a one-to-one relationship to dwelling demand;
- the total dwellings are converted into types of dwellings, standalone and attached using a set of assumptions which have been set as baseline preferences observed in the census. These dwellings are then allocated spatially to urban areas in the Greater Christchurch based on the observed patterns in development activity using building consent data;
- projecting demand preferences through various methods including as assessment of previous development activity using building consent data to project the share of dwellings by type, which for the HCA is standalone dwellings and attached dwellings
- following the demand analysis, the competitiveness margins outlined in the NPS-UD are applied in order to support choice and competitiveness in the housing market.

Various submission points considered that housing demand was underestimated in the modelling that informed the HCA, and therefore that the sufficiency was overestimated. Some submitters considered that this underestimation of demand and overestimation of supply is compounded when demand is assessed by location and type. In summary, some submission points do not accept the extent, nature, and location of demand that has informed the draft Spatial Plan.

The HCA which informs the draft Spatial Plan adopted the Stats NZ medium projection for Christchurch and high projections for Selwyn and Waimakariri. This is based on a comparison of the recent growth observed in each area (over the last five years) as compared to the projections. Stats NZ state that the medium projection is considered the most suitable for assessing future population change and is consistent with the 50th percentile (median) of the Stats NZ National Population Projections 2022(base)-2073 (released 27 July 2022). Stats NZ does however advise customers to make their own judgement on which projections best suit their purposes. The HCA states that there is ongoing need to check whether the chosen projection is appropriate. This is important to maintain the usefulness and relevance of future development capacity assessments. Through recent hearings on RMA processes there has been acceptance of the high projections for both Selwyn and Waimakariri Districts.¹⁵⁹ The medium projection for Christchurch City has been evaluated by staff at Christchurch City Council that confirm that the medium projection remains an appropriate projection scenario, however there is an indication that for a future HCA the scenario for the long-term could be a medium-high projection. The projections that inform the draft Spatial Plan are likely to be conservative and apply the appropriate competitiveness margin.

Notably, in the last 12 months the economy has entered a recession and building activity has declined from record levels, which indicates that in the future demand may decline below the projections that informed the draft Spatial Plan. Underlying demand which is population-derived, driven by migration, natural growth, and other demographic factors is expected to change regardless of market conditions and continue to generate demand for housing.

As previously stated, submitters generally consider there will be mismatches between demand for locations and types of dwellings within the urban environment over the next thirty years. Submission points consider that the desired pattern of growth outlined in the draft Spatial Plan being greater intensification in urban and town centres, and along public transport corridors does not account for market demand for standalone typologies in new development areas now and into the future. Net new dwelling consents data shows that there is a trend of attached dwellings are increasing their overall share of new dwellings in Greater Christchurch.

The HCA that informs the draft Spatial Plan currently assumes that only 37% of new dwelling demand will be for attached dwellings in the coming thirty years. This is conservative, as the actual share is likely to be much higher as evidenced by observed trends in building consent data. Over the next 30 years the trend toward attached dwellings is likely to grow. The projections and demand assessment are likely conservative, underestimating the current and future demand for attached dwellings and overestimate demand for standalone dwellings.

¹⁵⁹ Independent Commissioner Decisions – 20 August 2023, Selwyn Proposed District Plan
Independent Commissioner Decision – 18 July 2023, Birchs Village Limited Plan Change 79 Selwyn Operative District Plan
Hearing – 2-10 August, Plan Change 31 - Rolleston Industrial Developments Limited Waimakariri Operative District Plan

The allocation to locations in the HCA and GCSP is also likely to be conservative in terms of demand for greenfield dwellings. This is mainly due to the changing preferences of the market and the implications of a large change in plan enabled capacity that has occurred via changes to the planning frameworks that affect Greater Christchurch, notably DPRs, private plan changes and the IPIs. It is however too early to tell definitively what the impacts will be and how the market will operate within this new framework. It is plausible that the location of demand will change and that this change will most likely result in more demand for brownfield locations and less for greenfield. Continued monitoring of take-up which informs what is 'reasonably expected to be realised' in existing urban areas will offer an insight as to whether the changes made to the planning framework as a result of IPIs and what is to follow the draft Spatial Plan has a material impact on the pattern and type of development. Clause 3.9(1)(e) of the NPS-UD requires that in urban environments the proportion of housing development capacity that has been realised in previously urbanised areas (such as through infill housing or redevelopment) be monitored quarterly. This is a component of broader quarterly monitoring requirements for provided for by clause 3.9 of the NPS-UD. Local authorities are jointly responsible for doing the required monitoring and therefore it is appropriate that this forms part of the joint work programme of the Spatial Plan (see Section 4.8.6).

Recommendations:

There are no recommended changes to the draft Spatial Plan in relation to the submission points above. We encourage the Partnership to foster greater collaboration with the development sector as well as providers of development infrastructure and additional infrastructure. Furthermore, we encourage the Partnership to explore improvements to the HCA beyond statutory requirements, including the content of submissions and the list of key work to be undertaken included in Table 50 of the HCA.

4.8.3 Assessing Housing Development Capacity

Various submission points consider that the HCA that has informed the draft Spatial Plan does not adequately assess the sufficiency of housing development capacity, with respect to both the type and amount of capacity assessed. Submission points particularly refute what has been assessed as feasible and reasonably expected to be realised.

The sufficiency of housing development capacity is assessed in accordance with the NPS-UD and broadly uses the following approach:

- First, the plan-enabled capacity is estimated to provide the upper limit on potential housing development that could be achieved.
- Plan-enabled capacity is then adjusted to what is infrastructure ready which removes capacity that cannot be serviced by development infrastructure.
- This capacity is further modified to what is reasonably expected to be realised based on observed patterns of development and developer intentions.

- The final step is to assess what of the plan-enabled capacity is feasible for development based on a number of general assumptions on the relationship between costs and revenue to determine what is commercially viable to a developer.

Inherently the modelling of capacity relies on assumptions, which have been set based on the best available data. It is important to acknowledge that no model can be perfect and that there will always be unders and overs. In the case of the HCA, as required by the NPS-UD, by design it is most likely that the HCA modelling will underestimate capacity that is developable in the urban environment. Submitters that represent the development sector sought to enhance collaboration with the partnership on the next assessment of development capacity which is wholly appropriate and is provided for by the NPS-UD and specifically by clause 3.21.

The NPS-UD distinguishes between the different types and forms of housing. The HCA does not account for different forms of housing in the model, including feasibility, such as non-commercial (such as Kāinga Ora), semi-commercial (such as Ngāi Tahu Properties), and non-developer (such as retirement villages) which have different approaches to providing dwellings. A number of submission points are critical of this fact. Submission points assert that these forms of housing represent housing choice and account for a portion of current supply and will likely represent a portion of future supply. The model for assessing development capacity assesses and quantifies the numbers of dwellings by type and assesses the feasibility on the basis of what is viable to a commercial developer. This means that capacity modelling, by design, underestimates the amount of development that is feasible as it only assesses the development of land using a 'normal' commercial developer business model.

In Waimakariri and Selwyn most developers are proposing to develop more dwellings than was estimated in the capacity model which means that the provision is likely to be higher than shown in the HCA. Accounting for both atypical developers as well as the intentions of conventional developers that are developing beyond what capacity models for Selwyn and Waimakariri estimate to be commercially feasible, the modelling is likely conservative in estimating the total capacity that is actually developable.

In the HCA, Christchurch City was found to have a plan-enabled capacity of 94,000 dwellings over the long-term. The enablement achieved through the IPI has added significantly to development capacity in Christchurch City, including feasible capacity. This was confirmed in a recent August 2023 assessment of medium density housing capacity which supplemented the February 2023 Christchurch City Council Plan Change 14 Section 32: Part 1, Appendix 1 Updated Housing Capacity Assessment.¹⁶⁰ Also, there is likely to be additional supply of residential dwellings provided in the commercial areas as the latest evidence presented in the IPI process suggests that residential

¹⁶⁰ Plan Change 14(Housing and Business Choice) to the Christchurch District Plan - Section 32: Part 1, Appendix 1 Updated Housing Capacity Assessment Feb 2023. [PC14-S32-Part-1-Appendix-1-Updated-Housing-Capacity-Assessment-14-March-2023.pdf \(ccc.govt.nz\)](#)

Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan - Statement of Evidence of John Scallan on Behalf of Christchurch City Council – Housing Capacity Assessment Aug 2023. [52-John-Scallan-Statement-of-evidence-final.PDF \(ihp.govt.nz\)](#)

development is commercially feasible within the commercial zone.¹⁶¹ Christchurch City is a more mature urban area within the urban environment where a significant proportion of its total growth comes from the redevelopment of brownfield sites and a smaller proportion (relative to Selwyn and Waimakariri Districts) are greenfield sites on the urban fringe. Feasible capacity in Christchurch City was significant at the time the HCA and the draft Spatial Plan were prepared, and has since increased as a result of the IPI process.

Many submission points consider that the assessment of housing capacity is not granular enough in respect of sub-territorial authority areas. Submitters consider that demand for particular locations in the urban environment has been understated and/or masked by aggregating the development capacity assessment to the territorial authority level. Policy 1 of the NPS-UD stipulates that well-functioning urban environments have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The NPS-UD requires that the HCA applies, at a minimum, to the tier 1 urban environment and that local authorities assess demand and capacity within the boundaries of the urban environment. The NPS-UD requires that the HCA estimates, for the short term, medium term, and long term, the demand for additional housing in the region and each constituent district of the tier 1 urban environment in different locations. Clause 3.14(2) of the NPS-UD states that local authorities may identify locations in any way they choose. Clause 3.25(2) of the NPS-UD requires that development capacity be quantified as numbers of dwellings in different locations, including in existing and new urban areas. The HCA does not overtly quantify the development capacity in existing and new urban areas, nor does table 2 of the draft Spatial Plan. The NPS-UD makes no requirement for the assessment of development capacity to be undertaken at sub-territorial authority area.

The HCA asserts that the key demand drivers are location, land availability, cost and condition, land use zoning and consenting certainty. The HCA found that locational preferences are driven by many reasons, including the availability of sections and houses, lifestyle, employment, education, family, financial circumstances, and at least in part, to where people want to go, and how often these trips need to be taken (people's willingness to travel). The HCA states that very little, if any, information is available in Greater Christchurch about what are the current and possible future factors that drive where people choose to live. On the basis of trends observed in other tier 1 urban environments, households in Greater Christchurch will likely become more willing to trade off type of house (i.e. standalone to attached) in order to maintain size of dwelling (i.e. bedrooms), location (i.e. central locations), and affordability (i.e. lower price point). The HCA suggests that research is required to identify the locational trade-offs the population are willing to make (such as travel times for employment and education) and whether these reasons are likely to change over time. Table 50 of the HCA identifies that further work could consist of showing capacity and demand by sub-area of the urban environment.

¹⁶¹ Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan - Statement of Evidence of Ruth Allen on Behalf of Christchurch City Council – Commercial Feasibility – High Density Residential Development Aug 2023 [13-Ruth-Allen-Statement-of-evidence-final.PDF \(ihp.govt.nz\)](#)

Recommendations:

There are no recommended changes to draft Spatial Plan in relation to the submission points above. We encourage the Partnership to foster greater collaboration with the development sector as well as providers of development infrastructure and additional infrastructure. Furthermore, we encourage the Partnership to explore improvements to the HCA beyond statutory requirements, including the content of submissions and the list of key work to be undertaken included in Table 50 of the HCA.

4.8.4 Level of Sufficiency

The draft Spatial Plan reaffirms the findings of the HCA that there is insufficient development capacity over the long term. This is due to an identified long term technical shortfall of 3,250 dwellings in the Selwyn District. In Greater Christchurch overall there is a surplus of 54,450 dwellings. Submitters considered that the HCA and therefore the draft Spatial Plan underestimate the risk of shortages in the medium or long term. Both the demand projections and capacity estimates are conservative therefore the suggestion that shortfalls are greater than stated in the HCA and GCSP is not supported. In Waimakariri for the medium and long term there is a small positive margin. In Christchurch for the medium and long term there is a large positive margin. In Selwyn as a result of the IPI and DPR process additional capacity has been added to the medium term through the live zoning of land within FUDAs and the UGO. This shortfall has been reduced and is not anticipated to eventuate until 2050 or later. Given that the model is conservative and likely underestimates the future density of development in greenfield areas and the quantum of intensification in the long-term, there is likely sufficient development capacity to accommodate the long-term technical shortfall.

Submitters generally contend that the overall shortfall, or location-specific shortfalls are more pronounced than is included in the HCA and GCSP. The assessment of the implications of commissioners' recommendations on the DPR and IPI for Selwyn is that the shortfall is less pronounced. Submitters are correct in identifying that a long term shortfall remains in the urban environment which is acknowledged in the draft Spatial Plan. Both the demand projections and capacity estimates are conservative, therefore the submitters' suggestion that shortfalls are greater than stated in the HCA and the draft Spatial Plan is not supported.

Recommendations:

There are no recommended changes to the draft Spatial Plan in relation to the submission points above. We encourage the Partnership to foster greater collaboration with the development sector as well as providers of development infrastructure and additional infrastructure. Furthermore, we encourage the Partnership to explore improvements to the HCA beyond statutory requirements, including the content of submissions and the list of key work to be undertaken included in Table 50 of the HCA.

4.8.5 Business Development Capacity

The NPS-UD requires that local authorities must provide at least sufficient development capacity to meet expected demand for business land from different business sectors over the short term, medium term, and long term. The development of the draft Spatial Plan was informed by the Greater Christchurch Business Development Capacity Assessment April 2023 (BCA). The purpose of the BCA is to outline whether there is sufficient capacity for business development (both industrial and commercial) over the short, medium and long term.

The Greater Christchurch Partnership has reviewed and accepted the findings of the capacity assessment that informed the draft Spatial Plan. The capacity assessment methodology and draft report were independently peer reviewed by relevant experts. This assessment of future demand for and supply of business land incorporated a range of conservative assumptions to ensure demand was not underestimated nor supply overestimated.

Broad Locations for Business Land

The broad locations of business development capacity are identified on Map 14 (700, 000 people) and Map 2 (1 million people) in the draft Spatial Plan. This supports Opportunity 5 *Provide space for businesses and the economy to prosper in a low carbon future* and Direction 5.1 *Sufficient land is provided for commercial and industrial uses well integrated with transport links and centres network*. Submitters¹⁶² have sought amendment to Direction 5.1 to include 'at least' to better align with the NPS-UD. We agree with this and recommend the change below.

Recommendations:

- a) Amend Direction 5.1 on pages 31, 75 and 77 as follows:

At least sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.

4.8.6 Business Development Capacity Assessment

Business Industrial

Two submitters¹⁶³ have concerns about the location of new / expanded industrial areas as the resultant development in these locations could lead to nuisance effects such as increased noise and odour, and reverse sensitivity effects. Such matters will be appropriately considered through District Plan rezoning processes¹⁶⁴. However, there are recommended changes to Spatial Strategy Directions discussed below that will highlight this concern.

The Business Capacity Assessment (BCA) concludes that there is sufficient capacity in each Council and significant capacity existing across the Greater Christchurch area overall¹⁶⁵. Broad locations for where longer-term industrial areas may be provided for are shown on the desired pattern of growth map in the draft Spatial Plan.

¹⁶² Submitter 320 Cockram Premises Limited, Submitter 267 Woolworths New Zealand

¹⁶³ Submitter 173 Ara Poutama Aotearoa Department of Corrections; Submitter – 342 PorkNZ

¹⁶⁴ Schedule 1 of the Resource Management Act provides direction for Preparation, change, and review of policy statements and plans, including consultation.

¹⁶⁵ <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/HuiHui-Mai/Greater-Christchurch-Business-Development-Capacity-Assessment-April-2023.pdf>. Pages 58-60; Section 9.3

Nine submissions¹⁶⁶ questioned the industrial capacity and demand in the BCA. They are concerned that the existing land is not suitable to meet demands of different businesses, and that the demand projects assume demand for industrial land will decline in the future which in their view does not reflect the market. They also question the capacity estimates and demand projections, within the context of the existing market conditions. The submitters consider that the Spatial Plan should provide additional greenfield industrial land.

In terms of capacity assessment, the capacity for vacant industrial land was conservative and there is additional capacity within industrial zones. This includes the redevelopment potential of land occupied by buildings, which is going to be investigated¹⁶⁷, and vacant floorspace. Also, the now partially operative Selwyn District Plan has rezoned approximately 225ha of new greenfield industrial in Rolleston. In addition (and as previously stated), the Draft Spatial Plan identifies indicative locations for additional greenfield industrial land to the south of Rangiora, south of the Christchurch airport, on the fringe of Hornby and to the northeast and northwest of Rolleston.

We consider that both the demand projections and capacity estimates are reasonable. Therefore, we disagree that the BCA or DSP underestimates the risk of shortages in the medium or long term.

Business Commercial

Supermarkets

The two main New Zealand supermarket operators¹⁶⁸ question whether there is sufficient opportunity to provide for new supermarkets within the urban environment and whether the draft Spatial Plan can clarify the hierarchy of centres to recognise the role of supermarkets.

The food industry, including supermarkets, need to ensure that they can meet the evolving needs of their customers and communities. For supermarkets, this will likely include both traditional bricks and mortar supermarkets (including smaller convenience stores) and expanding e-commerce by increasing capabilities and fine-tuning strategies. We acknowledge that supermarkets are continually responding to the changing preferences of customers, investing in ways to improve the grocery environment and enhancing shopper experiences. The shift by New Zealand supermarkets to offering online shopping with home delivery or 'click and collection' options through the Covid 19 pandemic is an example of how supermarkets have responded to a changing environment and customer preferences.

The Spatial Plan seeks to locate commercial activities, including supermarkets, in a range of centres as this provides for a well-functioning urban environment. However, District Plans do have enabling policies which appropriately recognise that large format retail, such as supermarkets, may occur

¹⁶⁶ Submitter 202 ChristchurchNZ; Submitter 210 Arumoni Developments Limited; Submitter 214 Greg Gaba; Submitter 316 Lynn Townsend & Malcolm and Lynn Stewart; Submitter 320 Cockram Premises Ltd Cockram Premises Ltd; Submitter 345 Trojan Built Property Holdings Limited; Submitter 348 Balance Developments Limited; Submitter 308 Rob Nicol; and Submitter 313 Miles Premises Ltd

¹⁶⁷ Formative has been engaged by CCC to undertake research to investigate redevelopment potential. While this work will not cover vacant land, it will provide additional information on the potential supply in the industrial areas.

¹⁶⁸ Submitter 267 Woolworths New Zealand Limited and Submitter 329 Foodstuffs (South Island) Properties Limited Foodstuffs

outside centres/ within a walkable distance to centres subject to criteria (e.g. Policy 15.2.2.4 of the Christchurch District Plan). We consider that there is no need to specifically address this further in the Spatial Plan.

Capacity

Five submissions¹⁶⁹ sought specific additional areas to be shown on Map 2 as future Business commercial. The locations of these are shown in Figure 8.

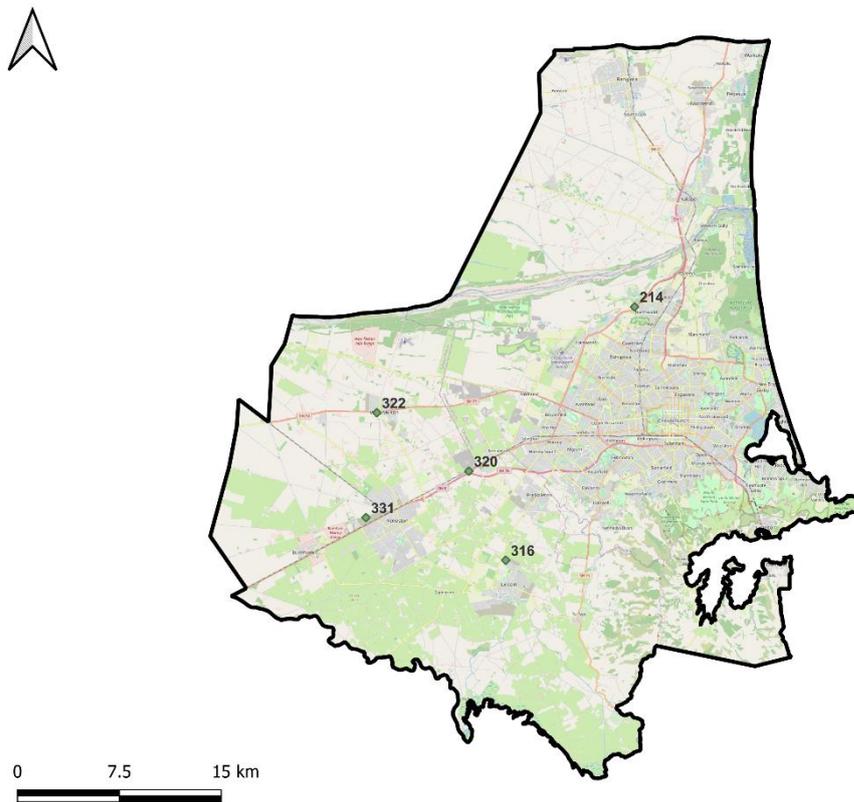


Figure 8: Locations of submissions seeking greenfield business

One submission¹⁷⁰ questions the long-term shortfall in Christchurch, and the extent to which existing centres can accommodate any forecast shortfalls through redevelopment, vacant floorspace and additional heights and densities.

Table 4 in the draft Spatial Plan shows that there is sufficient capacity in the medium term for the urban environment. The BCA concludes that each Council has enough supply to meet the demand for commercial land in the next 10 years, but when looking over the long term there is a shortfall of

¹⁶⁹ Submitter 214 Greg Gaba; Submitter 316 Lynn Townsend & Malcolm and Lynn Stewart; Submitter 329 Foodstuffs (South Island) Properties Limited; Submitter 320 Cockram Properties Limited; and Submitter 322 West Melton Three Limited.

¹⁷⁰ Submitter 202 ChristchurchNZ

110ha in Christchurch and 20ha in Selwyn. There is a surplus of 31ha in Waimakariri. Therefore, overall, there is a shortfall of 99ha across Greater Christchurch in the long term.

The BCA states¹⁷¹ that the sufficiency of commercial land development depends inherently on the assumptions used to calculate demand and supply projections. For example, a higher average building storey height assumption would have a bearing on overall commercial land sufficiency citywide, but particularly for the Central City where taller buildings are more likely.

Plan change 30 to the Waimakariri District Plan has provided an additional 12.8ha of commercial land in North Woodend. In addition, the partially operative Selwyn District Plan has provided approximately 18.4ha of further commercial land. This includes additional commercial land in Rolleston (11ha), Prebbleton (2ha), Lincoln (3.6ha) and West Melton (1.8ha). Further to this, Plan Change 14 to the Christchurch City Plan proposed to significantly increase the development potential in existing commercial areas through increased heights. This is summarised in the table below:

Table 13: Summary of Heights proposed in PC14

Proposed Zone	Enabled Height under operative plan	Enabled Height under Plan change 14 ¹⁷²
City Centre zone	28m	Up to 90m
Large Town Centre zone (Riccarton, Hornby, Papanui)	20m	32m
Town Centre zone (Linwood, Shirley, Belfast, North Halswell)	20m	22m
Large Local Centre zone	12m	22m
Small Local Centre zone	12m	14m

In addition to changes to the District Plan, the Christchurch City Council’s last survey of industrial zones in 2020/2021 found there was over 130,000m² of vacant floorspace in the Central City Business zone¹⁷³. In addition, there was found to be 90,000m² of vacant floorspace in the Commercial Core¹⁷⁴ and Commercial Local zones¹⁷⁵ in suburban areas. It is acknowledged that this vacant floorspace could be taken up by a range of uses, reflecting the activities enabled in commercial zones. However, it does not take account of other zones where commercial activities occur and the District Plan enables the existing quantum of floorspace (e.g., Mixed use zones in the Central City and suburban areas). It is also likely that there is additional capacity in the commercial zone from redevelopment potential (i.e., development of under-utilised sites that are currently occupied but an opportunity for more intensive use of the land). Ongoing monitoring will verify the potential level of demand and capacity for commercial land with further modelling proposed in the immediate future on an area-basis.

¹⁷¹ <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/HuiHui-Mai/Greater-Christchurch-Business-Development-Capacity-Assessment-April-2023.pdf> Page 57

¹⁷² As recommended by Reporting officers in their s42A reports to the Independent Hearings Panel on PC14

¹⁷³ Proposed to be rezoned to City Centre zone by PC14

¹⁷⁴ Proposed to be rezoned to Town Centre and Local Centre zones by PC14

¹⁷⁵ Proposed to be rezoned to Neighbourhood Centre zone by PC14

As discussed above, we consider that both the demand projections and capacity estimates are reasonable. The identified long-term shortfall in commercial land is expected to be met through greater intensification in sub-regional and locally significant urban and town centres, and through rezoning and redevelopment. The existing supply and this new supply will mean that there is a low risk of a shortage of commercial land in the long term.

Conclusion

In the absence of evidence to the contrary we are satisfied that the HBC is sufficiently robust to guide the Greater Christchurch Spatial Plan, and that the draft Spatial Plan has appropriately identified broad locations of the desired pattern of growth. For the reasons provided above, no additional future industrial or commercial areas are recommended.

Recommendations

- a) Amend Map 2 and Map 14 (pages 29 and 79 respectively) to align with new / expanded business (industrial and commercial) areas that were rezoned by the partially operative Selwyn District Plan.

4.8.7 Monitoring and Development Capacity

The draft Spatial Plan states that the Partnership will establish an implementation plan and mechanisms to monitor progress in achieving the opportunities, directions and key moves set out in the Spatial Plan, and for reporting on progress of the joint work programme. This commitment does not extend to the monitoring requirements listed in Subpart 3 Part 3 of the NPS-UD. Subpart 3 Part 3 of the NPS-UD sets out quarterly monitoring requirements for an urban environment of which the local authorities are jointly responsible for. There is a requirement for local authorities to publish the results of this monitoring at least annually.

Both the HCA and BCA have set out their ambition to refine and improve the assessments for their next iteration. The HCA asserted that there is a need to improve monitoring and considered the potential to investigate a dashboard.¹⁷⁶ The BCA acknowledged that there remains a need for monitoring and future capacity assessment to consider the supply at a finer grain and whether it is meeting the needs of specific industries.¹⁷⁷ Submitters commented on how the business land demand assessment of BCA did not distinguish between sectors that would use land zoned for commercial, retail, or industrial uses as required by clause 3.28 of the NPS-UD. This is a matter that should be taken forward into the next iteration of the BCA. Periodic review is necessary to incorporate any new data and remain up-to-date. The next capacity assessments under the NPS-UD are scheduled to be completed in 2026. The NPS-UD requires monitoring between capacity assessments, which supports evidenced-based decision-making and will inform subsequent FDSs.

Recommendations:

- a) Insert the following sentence at page 92 of the draft Spatial Plan:

¹⁷⁶ Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment (page 64). [Greater-Christchurch-Housing-Development-Capacity-Assessment-March-2023-v3.pdf](https://www.greaterchristchurch.org.nz/greater-christchurch-housing-development-capacity-assessment-march-2023-v3.pdf) ([greaterchristchurch.org.nz](https://www.greaterchristchurch.org.nz))

¹⁷⁷ Greater Christchurch Business Development Capacity Assessment April 2023 [Greater-Christchurch-Business-Development-Capacity-Assessment-April-2023.pdf](https://www.greaterchristchurch.org.nz/greater-christchurch-business-development-capacity-assessment-april-2023.pdf) ([greaterchristchurch.org.nz](https://www.greaterchristchurch.org.nz)) Page 57

The progress made on the work programme will be reported bi-annually to the Whakawhanake Kāinga Komiti. **The partnership must also undertake monitoring as required by the National Policy Statement on Urban Development which will inform future development capacity assessments.**

4.9 Priority Development Areas

Submissions

As part of the consultation process a question was asked on the *Have Your say* submission form in relation to the identification of Priority Areas in the draft Spatial Plan:

“Do you agree with the approach to focus on these areas?”

Of the submitters that used the online form, 278 responded to the question. The position of these respondents was:

Table 14: Response to *Have Your Say* Question 5: *“Do you agree with the approach to focus on these areas?”*

Position	Number of Responses	% of Total Responses
Support	133	48.01%
Opposed	79	28.52%
Unsure	66	23.74%

Overall, 185 submission points were coded¹⁷⁸ as relating to the Priority Development Areas within the draft Spatial Plan. Of these 87 were in support, 44 were unsure or partially in support and 54 were opposed.

Generally, those in support either agreed with the areas identified or with the concept, but sought for other areas to be included. Those that were unsure or in partial support (even some of the opposed) were so on the basis of wanting other areas identified as a priority. Other locations that were put forward by submitters include:

- *Halswell*
- *Kaiapoi*
- *Prebbleton*
- *Lyttelton*
- *Sydenham/Lancaster (South of Moorhouse)*
- *University of Canterbury*
- *Woodend/Pegasus/Ravenswood*

With regard to the Priority Areas identified in the draft Spatial Plan, a number of points related to Eastern Christchurch, primarily in support of its inclusion but also that there was not enough being done in the eastern parts of Christchurch with regard to development.

Further, there was a mix of support for Priority Development Areas being identified in Rolleston and Rangiora, some recognising the need to provide for the growth in those locations while others believing the focus should be on those identified in Christchurch City.

A further theme in the submissions was that the identification of Priority Development Areas was forcing growth to these locations, and not providing for development of other locations across Greater Christchurch.

¹⁷⁸ Noting that only submission points with comments provided were coded. Some submissions just gave an indication of their position only.

Further, there was also a degree of uncertainty raised in submissions around how and why some locations were identified and how the development of these locations will occur, including their further spatial refinement and prioritisation.

Response to Submissions

4.9.1 Identified Priority Development Areas in the draft Spatial Plan

The Priority Development Areas (PDAs) have been identified in the draft Spatial Plan as a key component of the Urban Growth Partnership (UGP). A PDA is an area that requires a focussed and coordinated effort, at a given time, and are a key tool as part of the Urban Growth Agenda framework that provides a mechanism for coordinated and aligned action across multiple agencies, to inform, prioritise and unlock investment, and drive collective accountability.

The approach of identifying and using PDAs is used across the other New Zealand Urban Growth Partnerships. Typically, a Priority Area:

- Offers opportunities for accelerated and/or significant development;
- Is complex, in that successfully developing at the required pace and scale requires working in partnership i.e. BAU delivery will not be sufficient; and
- Are in key locations where successful development gives effect to our joint spatial plan.

Some of the challenges faced in the Priority Development Areas in enabling more and accelerated intensification include:

- Fragmented land ownership
- Land banking
- High cost of redeveloping brownfield sites with existing buildings and other improvements
- People's negative perceptions of intensification and higher density living.
- Medium Density Residential Standards (MDRS) enabling intensified development in wider locations that may challenge uptake in the Priority Areas.

The identification of Priority Development Areas within the draft Spatial Plan provide a focus in the Urban Growth Partnership to enable the long-term development and overcome some of the above issues. This can occur in various ways, including through partnership with Central Government, funding for lead investment or financial tools and incentives to encourage development. We note that this report also responds to submission points on tools and incentives in Section 4.11 Joint Work Programme/Implementation.

We note that if an area is not currently identified as Priority Development Area in the draft Spatial Plan, it does not mean that it may not become one at a later date. The list can change and be re-prioritised as challenges and opportunities change or evolve.

Further, the intent of Priority Development Areas is to provide a mechanism to help progress complex and/or significant development opportunities. They are not intended be the sole focus of development in Greater Christchurch. Development of, and investment in, other locations can and will occur in a 'business as usual' way and form part the wider work programme of the GCP or

individual Councils. The 'other areas' identified in submissions will be expected grow, and are important in the development of Greater Christchurch, however the process for this to occur will be in a 'business as usual' approach.

Rangiora and Rolleston were both identified as PDAs as they are key growth and development locations for the respective districts and enhanced public transport into and form the districts. Both towns and centres face challenges in delivering greater intensification against the backdrop of significant 'greenfield' growth over the last 10-15 years. As PDAs, both would have a focus in seeking to improve intensification feasibility and development around the centres and core public transport routes. There are also opportunities for developments and exemplar projects in these towns that would benefit from partnership and investment that a Priority Development Area process could facilitate. These opportunities could be a catalyst for development of greater intensification.

A submission from ChristchurchNZ¹⁷⁹ identified a 100ha south of Moorhouse Ave in the Sydenham/Lancaster area just on the periphery of the Central City as a potential PDA. This is an area of light industrial land that has recently been notified Plan Change 14 to be changed to a mixed-use zone. This is a significant area that may require further planning and investment to aid the transition from industrial to mixed use but primarily high density residential.

This area would benefit from further master planning to identify what the key opportunities may be, particularly for central government intervention, before identifying it as a Priority Development Area. We considered including it as part of the Central City PDA with the addition of 'and surrounds' to the Central City PDA name, but in our view this could raise community expectations for this area and others surrounding the Central City PDA for greater intervention. In addition, any growth in a larger Central City PDA area, or another specific PDA on its edge, is likely to be at the expense of central city growth and so delay the time it takes for the central city achieving an extra 20,000 residents to achieve a vibrant city. It also detracts from the PDAs on the MRT route, which is a focus for the desired pattern of growth in the draft Spatial Plan. The consequence of this would be that central government agencies will not be able to demonstrate sufficient benefit rate of return when compared with other competing priorities. We therefore consider that although the 'South Moorhouse' area is significant, it may be included as a PDA at a later date, once the Central City PDA is more advanced in its implementation.

Transpower¹⁸⁰ sought that the National Grid should be identified on the 'Map 4: Priority Areas for Greater Christchurch' as a clear constraint to development of identified priority areas. This is not considered necessary as the National Grid is already identified as a constraint on Map 9: 'Strategic Infrastructure'.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

¹⁷⁹ Submitter 202

¹⁸⁰ Submitter 325

4.9.2 Identification of Eastern Christchurch as a Priority Area

Eastern Christchurch has been identified as a Priority Area, rather than a Priority Development Area, to recognise the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience. The area formed part of the technical assessment but has been identified separately to ensure it is recognised as a priority while acknowledging that the expectations and outcomes are not growth outcome focused in the same way as the Priority Development Areas. Growth is expected, and is enabled through the District Plan, to occur in eastern areas of Christchurch, just as it across the City, this is not the focus of the draft Spatial Plan identifying Eastern Christchurch as a Priority Area. The focus is on enabling Eastern Christchurch to adapt to the impacts of climate change and to strengthen resilience. The area is large and encompasses some of Greater Christchurch's more vulnerable communities in an area subject to a several natural hazards. There are benefits in defining an area in the east of Christchurch for investment to be agreed between partners through the joint work programme of the draft Spatial Plan.

Recommendations

We do not recommend any changes to the draft Spatial Plan as a result of the above submission.

4.9.3 The process to come for identified Priority Areas

The Priority Areas will be a focus of the joint work programme, designed to drive change, deliver on the strategic direction and move towards the desired pattern of growth as set out in the spatial plan. The intention is for there to be a joint effort to tackle challenges that cannot be resolved by a business-as-usual approach.

The GCP management groups will provide oversight of the Priority Areas and other actions identified in the joint work programme, including allocation of resource from across local and central government. This includes:

- Defining what success might look like for each Priority Area
- Developing scope of work, indicating:
 - Resourcing
 - who needs to be involved, which could include people, agencies and stakeholders both internal and external to the Urban Growth Partnership
 - Funding to complete the work.
 - high level timeframes
- Developing a prioritised programme for the Priority Areas
- Developing a detailed programme plan for the top Priority Areas
- Engage and appoint project team
- Workshops with key stakeholders to develop Masterplan for Priority Areas
- Tracking and reporting progress
- Addressing any risks or issues that will affect the successful delivery
- Reporting up to the Whakawhanake Kāinga Komiti.

Reporting on progress will be a focus of future Whakawhanake Kāinga Komiti meetings. Progress on Partnership Priority Areas is also reported to wider Urban Growth Agenda Ministers quarterly.

An overall lead (or joint lead) will need to be identified for each priority area who is accountable for the delivery of each action. The spread of leads should be divided across the different partners.

The focus on priority areas enables a lot of detail to be worked through in a sequenced manner to deliver the spatial plan. Reprioritisation of the priority areas may be required to respond to changing circumstances.

The Ministry of Education¹⁸¹ and Orion¹⁸² both supported the priority development areas but highlighted the need as infrastructure providers to form part of the discussion around developing these areas to proactively ensure that appropriate infrastructure is provided in a coordinated way to support the desired growth. This will be strong consideration in developing the scope and work programme for each Priority Development Area.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

4.10 Infrastructure

4.10.1 Protection of strategic infrastructure

Submissions

Submitters raised a range of issues related to the approach in the draft Spatial Plan to protecting strategic infrastructure.

Some submissions¹⁸³ challenged the statement on page 60 of the draft Spatial Plan that urban development should be ‘avoided’ to ensure the safety and wellbeing of residents and to safeguard the effective operation, maintenance, and potential for infrastructure upgrades.

Others¹⁸⁴ sought better recognition and/or protection of existing infrastructure and provision for future infrastructure in the Spatial Plan.

Both Orion Group Limited¹⁸⁵ and the Ministry of Education¹⁸⁶ highlight in their submissions the importance of engagement with key infrastructure providers.

¹⁸¹ Submitter 220

¹⁸² Submitter 336

¹⁸³ Including, Submitters 171, 306, 313, 326, 345

¹⁸⁴ Including the Board of Airline Representatives New Zealand (204), Christchurch International Airport Limited (218), Lyttelton Port Company Limited (332), Transpower (325), Orion Group (336), and Ara Poutama Aotearoa Department of Corrections (173)

¹⁸⁵ Submitter 336

¹⁸⁶ Submitter 220

Submissions which raised issues relevant to the airport noise contours are addressed in Section 4.10.2 below. Some submission points made by infrastructure providers are discussed within other relevant sections of this report, for example where comments related to housing, business, transport systems, or Priority Development Areas.

Response to submissions

The draft Spatial Plan (page 60) states that ‘urban development should be avoided around strategic infrastructure to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure’. It identifies ‘key strategic infrastructure’ in Greater Christchurch as including Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network. This infrastructure is identified spatially on Map 9. Direction 5.3 also sets out the approach to the provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy.

Summerset Group Holdings Ltd¹⁸⁷ submits that current legislation does not provide for the outright ‘protection’ of strategic infrastructure nor direct urban development to ‘avoid’ such areas, and that the approach does not reflect the ability to mitigate the effects of development through mechanisms such as noise insulation and careful site planning. Other submitters¹⁸⁸ sought specific changes to the text on page 60, as follows:

~~‘Urban development should be avoided~~ Appropriate measures should be applied around strategic infrastructure to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure.’

Strategic infrastructure represents an important regional or national asset and there is a need to ensure it can continue to operate efficiently and effectively. Development should not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs. The existing planning framework includes the avoidance of noise sensitive activities within the 50dBA Ldn noise contour for Christchurch International Airport (with specific exceptions)¹⁸⁹, and the avoidance of activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.¹⁹⁰

We consider that while the avoidance of activities may be required in some circumstances to protect strategic infrastructure, in other cases the operation of strategic infrastructure can be appropriately provided for through the careful management of development. For this reason, we recommend an amendment to the wording on page 60 to this effect, noting however that in some instances, the avoidance of development is likely to remain appropriate.

¹⁸⁷ Submitter 171

¹⁸⁸ Including, Submitters 306, 313, 326, 345

¹⁸⁹ Canterbury Regional Policy Statement, Policy 6.3.5 (4).

¹⁹⁰ Canterbury Regional Policy Statement, Policy 6.3.5 (5).

The Board of Airline Representatives New Zealand¹⁹¹ seeks better recognition of significant infrastructure and its relationship with future urban development in the Directions section of the Spatial Plan, which it considers would assist in informing and guiding the community and relevant planning documents about the extent to which the location and development of noise sensitive activities is inappropriate within the noise control zones associated with Christchurch Airport. Christchurch International Airport Limited¹⁹² and Lyttelton Port Company Limited¹⁹³ submit that there should be a greater focus on the protection of existing strategic infrastructure assets and provision for future infrastructure (including development, maintenance, and upgrades) as Greater Christchurch grows. Similarly, Ara Poutama Aotearoa¹⁹⁴ considers it is important that the continued operation, upgrading, and expansion of the prisons is provided for and that they are protected from potentially incompatible land uses establishing around them. Orion Group¹⁹⁵ also suggested that the Spatial Plan includes a new Direction referring to the protection of strategic infrastructure. Transpower¹⁹⁶ made a substantial submission to the draft Spatial Plan raising relevant points, including the need to recognise the role the National Grid will play in electrification of the economy to reduce GHG emissions.

Recognition of the importance of ensuring the efficient operation, use, development, upgrade, and future provision of strategic infrastructure, was a key consideration that has informed the development of the spatial strategy. This is reflected by the inclusion of strategic infrastructure on Map 5 and Map 9, and associated text, and Direction 5.3 which sets out the approach to the provision of strategic infrastructure. Officers consider that this is appropriately managed through the Canterbury Regional Policy Statement and district plans. A change in response to the submission by Transpower, recognising the role of the National Grid, has been recommended (see Section 4.3.6).

Orion Group sought an amendment to Direction 5.3 as follows: 5.3 Provision of strategic infrastructure that is resilient, efficient, integrated and meets the needs of a modern society and economy. Officers agree that ensuring that the planning for infrastructure is well integrated with new development is important, and recommend this change is accepted.

The Lyttelton Port Company also seeks the consistent identification of the port and inland ports on the Spatial Plan maps. We recommend an amendment to Maps 5, 9, and 15 to include symbology to identify the port and inland ports.

Some submissions raised concerns that not all strategic infrastructure is shown on Map 5 and / or Map 9, including prisons and the Port of Lyttelton City Depot (Inland Port). It is also noted that New Zealand Military Bases are missing from Map 9 and that the Woodford Glen Speedway and Ruapuna Raceway are shown, which does not appear to align with definitions of strategic infrastructure.¹⁹⁷ Amendments to Map 5 and Map 9 are recommended below to accurately reflect the locations of

¹⁹¹ Submitter 204

¹⁹² Submitter 218

¹⁹³ Submitter 332

¹⁹⁴ Submitter 173

¹⁹⁵ Submitter 336

¹⁹⁶ Submitter 325

¹⁹⁷ For example, the Canterbury Regional Policy Statement defines Strategic Infrastructure as ‘those necessary facilities, services and installations which are of greater than local importance, and can include infrastructure that is nationally significant’.

strategic infrastructure within Greater Christchurch. We also recommend that the title of Map 9 is amended to 'Key strategic infrastructure', to reflect that the map does not show an exhaustive list of strategic infrastructure, as already reflected in the text on page 60.

Transpower seeks amendments to Map 5 – to include National Grid assets, including subdivision corridors), and Map 9 – to correctly show the National Grid and differentiate between the National Grid assets and electricity distribution network assets. We recommend that Map 5 is amended to show National Grid assets, and Map 9 is corrected. We note that the submission also seeks the addition of the National Grid to Map 14, however this change is not supported on the basis this information is already shown spatially on other maps and the purpose of Map 14 is to show broad locations of housing and business development capacity.

Transpower also seeks an amendment to the final sentence on page 60 under the heading "Protecting strategic infrastructure" as follows:

Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the National Grid and the electricity transmission distribution network (see Map 9).

Orion Group similarly sought a change to refer to electricity distribution as well as transmission. We recommend this suggested amendment is accepted.

Recommendations:

a) Amend Map 5 (page 52), as follows:

- Identify Lyttelton Port and the inland ports
- Identify National Grid assets

b) Amend text under 'Protecting strategic infrastructure' (page 60) as follows:

Urban development should be ~~avoided~~ **carefully managed** around strategic infrastructure, to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, **and the National Grid** and the electricity transmission **and distribution** network (see Map 9).

c) Amend the title of Map 9 (page 60) to 'Key strategic infrastructure'.

d) Amend Map 9 (page 60) as follows:

- Correctly show the National Grid
- Differentiate between the National Grid assets and electricity distribution network assets
- Show locations of prisons
- Show the location of the Lyttelton Port Company City Depot inland port
- Show location of military bases

- Remove Woodford Glen Speedway and Ruapuna Raceway
- e) Move Map 9 and associated text (page 60), to sit immediately after Map 5, before Opportunity 1, to improve the logic flow of the document.
- f) Amend Direction 5.3 (page 80) as follows:
- 5.3 Provision of strategic infrastructure that is resilient, efficient, **integrated**, and meets the needs of a modern society and economy
- g) Amend Map 15 (page 84) to add port notations to map legend.

4.10.2 Airport noise contours

Submissions

Thirty-four submission points were coded as relating to the airport noise contours for Christchurch Airport or the airport itself.

Submitters raised a range of matters related to the airport noise contours for Christchurch International Airport.

Many of the submissions sought changes to the airport noise contour (50dBA) shown on Maps 5 and 9 of the draft Spatial Plan. However, submitters' views on which contour should be used in place of the current contour differed.

Various submitters¹⁹⁸ sought the inclusion of the 2023 Updated Noise Contours (see discussion under Response to submissions, which follows). The primary reason given was that they consider that the current operative contours (i.e. those in the Canterbury Regional Policy Statement and District Plans) are out of date.

Christchurch International Airport Limited (CIAL)¹⁹⁹ submits that the draft Spatial Plan (Maps 5 and 9) should incorporate the 2023 Outer Envelope 50dB Ldn Air Noise Contour. CIAL submits, in summary, that this contour represents the most up to date technical information of the geographical extent of projected aircraft noise exposure within Greater Christchurch and is the correct information for inclusion in a long-term strategic planning document.

Other submitters²⁰⁰ consider that noise contours used for planning purposes should rely on an Annual Average Noise Contour.

Some submissions²⁰¹ seek that the 2023 Annual Average 55 dBA Ldn Contour be shown on Maps 2 and 9 for the purposes of land use planning. They submit that avoidance or prevention of new

¹⁹⁸ Including, Submitters 218, 299, 340, 341,

¹⁹⁹ Submitter 218

²⁰⁰ Submitters 306, 309, 313, 340, 341, 347, 348

²⁰¹ Including, Submitters 309, 341, 347, 348

residential or other urban or land development within the 50 dBA Ldn airport noise contour is not necessary, desirable or justified to ensure the safety and wellbeing of residents, or to safeguard the effective operation, maintenance and potential for upgrades of Christchurch Airport, and that amenity can be protected through appropriate building design.

Three submitters²⁰² seek the inclusion of Annual Average 57 dBA Ldn and 65 dBA Ldn Noise Contours, based on a maximum 30-year assessment period (as opposed to ultimate runway capacity). These submissions also seek that the Spatial Plan be amended to state that sensitive activities are permitted between the 57-65 dBA Ldn contours, subject to appropriate acoustic insulation, and that no noise mitigation measures are required outside the 57 dBA Ldn contour.

Several submitters²⁰³ commented generally on the size and/or location of the airport noise contours. One submitter sought complete removal of the '50db Ldn outer control boundary'.²⁰⁴ Another submitted that if the air noise contours (specifically the 50 dBA Ldn contour) is not removed, the adverse impact on the ability of the Christchurch City Council to provide for growth is put at significant risk.²⁰⁵ One submission referred to the process for reviewing the contours and recommended a working group, comprising partners and Environment Canterbury, confirms the new contour so it can be reflected in district plans.²⁰⁶

One submitter²⁰⁷ suggested that the area under the airport noise boundary could be designated for light industrial so that some areas along the rail line can be rezoned for mixed use.

One submitter²⁰⁸ raised concerns related to the operation of the airport and the effects of aircraft noise on the health and wellbeing of the local community. The issues raised appeared to be mostly related to District Plan compliance.

Response to submissions

Map 5: Areas to protect and avoid, and Map 9: Strategic Infrastructure, show the extent of the current operative 50dBA and 55dBA noise contours for Christchurch International Airport (i.e. the contours in the operative Canterbury Regional Policy Statement and district plans).

The noise contours for Christchurch International Airport are being reviewed as part of the review of the Canterbury Regional Policy Statement. In September 2021 the Canterbury Regional Council formally requested that Christchurch International Airport Limited undertake a technical remodelling of the air noise contours relating to Christchurch Airport, as required by the Regional Policy Statement. An update of the noise contours was completed by Christchurch International Airport Limited and independently peer reviewed by a panel of experts appointed by Environment Canterbury. The final report of the Independent Expert Panel was made publicly available in July 2023.

²⁰² Submitters 306, 313, 345

²⁰³ Including, Submitters 108, 146, 299

²⁰⁴ Submitter 260

²⁰⁵ Submitter 149

²⁰⁶ Submitter 147

²⁰⁷ Submitter 72

²⁰⁸ Submitter 346

We note that the 2023 Updated Noise Contours will be a key input to the review of the Canterbury Regional Policy Statement, which is scheduled for notification in December 2024. Once the new Regional Policy Statement becomes operative, Waimakariri District Council, Selwyn District Council, and Christchurch City Council will be required to give effect to the revised contours and associated policy framework, through their district plans.

While we consider that the 2023 Updated Noise Contours represent the most up to date technical information of the geographical extent of projected aircraft noise exposure within Greater Christchurch, the contours have no statutory weight until they are incorporated into the revised Regional Policy Statement. We consider that the most appropriate process to determine which of the 2023 Updated Noise Contours should be used for the purposes of future land use planning is the review of the Regional Policy Statement. Similarly, this process will consider any changes to the associated policy framework.²⁰⁹

For this reason, no changes are recommended to Map 5 or Map 9. However, we do recommend that an explanation of the process to incorporate the 2023 Updated Noise Contours into the Canterbury Regional Policy Statement is added to the text associated with Map 9.

Recommendations:

- a) Amend the third bullet point under 'Related planning processes currently underway' (page 25) as follows:

Canterbury Regional Council is reviewing the **regional planning framework for Canterbury. A new Regional Policy Statement is expected to be notified at the end of 2024. This process seeks to align the regional planning framework with national direction such as the National Policy Statement for Freshwater Management 2020, including Te Mana o te Wai. It also Regional Policy Statement, which** includes a review of the **airport noise contours relating to Christchurch International Airport, mapping of highly productive land, and development of developing** significance criteria for new greenfield areas, **as well as the Regional Coastal Environment Plan and the Land and Water Regional Plan**. This review will also continue to consider, and direct, how to manage urban growth in balance with activities that occur in the rural environment.

- b) Add text under the heading 'Protecting strategic infrastructure' (page 60) as follows:

The noise contours relating to Christchurch International Airport as shown on Map 9 represent the contours operative in the Canterbury Regional Policy Statement 2013. As part of the review of the Canterbury Regional Policy Statement, an update of the airport noise contours was completed by Christchurch International Airport Limited and independently peer reviewed by a panel of experts appointed by the Regional Council. In June 2023 a final set of remodelled air noise contours was made publicly available in a report published by Christchurch International Airport Limited. The updated noise

²⁰⁹ We are aware that the airport noise contours are also being considered through Christchurch City Council's Proposed Housing and Business Choice Plan Change (PC14) (hearings scheduled to commence in October 2023) and the Waimakariri District Plan Review and Variation 1 to the Proposed District Plan (hearings scheduled for February 2024).

contours will be a key input to the review of the Regional Policy Statement, and this is the process by which changes to the spatial extent of the operative contours and the associated policy framework will be considered.

4.11 Joint Work Programme / Implementation

Submissions

As part the consultation process there were no specific questions asked on the *Have Your Say* submission form in relation to the Joint work programme and the implementation of the draft Spatial Plan.

Overall, 37 submission points were coded as relating to the implementation of the draft Spatial Plan. Most of these were either in support, or in support but seeking ongoing partnerships, and clarity on implementation and the tools may be utilised.

Those submission points that were not in support questioned the ability to implement the desired pattern of growth, given land fragmentation and ownership, a lack of funding and incentives to change.

Three main themes from such submissions are described below.

Partnerships – some submitters highlighted the need for clarity in how other entities will be engaged and involved in implementing the Spatial Plan. This highlights the importance of partnerships and building relationships with other key providers and stakeholders. There was particularly a focus around the delivery of the Economic Development Plan and MRT²¹⁰.

Tools/and Incentives – that to achieve the direction of the draft Spatial Plan would require various tools and incentives, and there was little in the draft Spatial Plan that provided clarity on what these might be.

NPS-UD Compliance – the draft Spatial Plan, as an FDS, does not recognise the need for a 3-year review of the FDS. This is a requirement under the NPS-UD. This is discussed and responded to in Section 4.12.3.

Response to Submissions

4.11.1 Partnerships

The implementation of the draft Spatial Plan is initially directed through the Joint Work Programme which comprises those key actions and initiatives that need to occur. The detail in how each of these is progressed will be worked out in their own program of works, leadership and funding and follow their own engagement and development process. The draft Spatial Plan indicates the need and commitment to do these and recognises that the implementation will occur through and across many plans, process, programs initiatives at varying levels of government and community.

The GCP will establish an implementation plan and mechanisms to monitor progress in achieving the opportunities, directions and key moves set out in the draft Spatial Plan and for reporting on progress of the joint work programme.

²¹⁰ Submitter 202 – ChristchurchNZ

It is recognised that in achieving this there will need to be strong partnerships and relationships built across central and local government with mana whenua and stakeholders, including infrastructure providers and commercial developers.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

4.11.2 Tools and incentives

To implement the draft Spatial Plan a wide range of mechanisms, incentives, or tools, will need to be utilised to shape the desired urban form. With the introduction of enabling policy direction,²¹¹ traditional ‘tools’ such as zoning, urban limits, and enabling densities in specific locations are less effective in directing growth to desired locations. There is a need to look at other approaches, in combination with traditional ‘tools’, to achieve the desired pattern of growth and a well-functioning urban environment.

Some relevant tools are already utilised. These include:

- Priority Areas
- Developing Central or Local Government owned land
- Public Private Partnerships
- Specific Development Projects
- Lead Investment
- Rates Rebates
- Master Planning
- Streamlined Planning Process.

The Priority Development Areas identified in the draft Spatial Plan are key tool in diving the direction of the draft Spatial Plan though developing a partnership with Central Government and focusing investment.

The need to consider different approaches is recognised in the joint work programme of the draft Spatial Plan, even if it has fallen short of listing what these might be. However, the draft Spatial Plan cannot outline all of these or exactly how they may be used as the issues and challenges that may need to be overcome will vary from location and to type of urban development. The ‘tools’ can also be used any different levels of influence and these need to be considered on case-by-case basis and, depending on the ‘tool’ may need wider public discussion²¹².

The purpose of the identification of ‘Statutory tools’ and ‘non-statutory tools’ in the joint work programme is to recognise the importance of these and to allow a more robust assessment of the possible ‘tools’ and how they may best give effect to the draft Spatial Plan and enable delivery of the joint work programme.

Recommendations:

We do not recommend any changes to the draft Spatial Plan as a result of the above submissions.

²¹¹ Examples - Policy 8 of NPS-UD, the EHS Act (needing to introduce MDRS)

²¹² Examples - Congestion Charging, Road Pricing and Road Tolls, land value capture

4.12 Evidence base

Submissions

70 submission points were coded to the 'evidence base' theme, which represents a broad phase of the process for developing the Greater Christchurch Spatial Plan. Submissions coded to the evidence base relate to the background documents and underlying body of work that informed the development of the Greater Christchurch Spatial Plan. This includes submission points received on the previous Huihui Mai engagement which is included in the front-end of the draft Spatial Plan. Although the evidence base includes the HCA and BCA, submission points received in relation to these two assessments have been coded separately. Submission points that requested changes to background documents rather than the draft Spatial Plan itself were considered out-of-scope.



Figure 9: Process of the broad phases of work to develop the draft Spatial Plan

Most submission points coded to the evidence base were not sufficiently clear whether the submitter was in support, opposed or unsure. Many submission points queried specific components of the underlying evidence base. Some submissions points were posed as questions seeking further information or clarification. Many of the details and further information sought by submitters were included in background and supporting documents rather than in the draft Spatial Plan itself.

The submission points coded to the evidence base were in relation to follow parts of the evidence base:

1. Huihui Mai
2. Population
3. The National Policy Statement on Urban Development 2020

4.12.1 Huihui Mai

Three submissions were received on the previous Huihui Mai engagement.

One submitter asked for details on the sampling methodology for the Huihui Mai engagement. The Huihui Mai engagement used a multifaceted approach over the six week engagement period to encourage a wide cross-section of Greater Christchurch residents to have their say. The Huihui Mai engagement sought information from the whole population of Greater Christchurch, therefore no sampling was undertaken. The other submission points questioned the appropriate use of methods and tools during the Huihui Mai engagement with a position that the results inaccurately reflected the experiences of those involved during the engagement. There were also two submitters that considered that the online survey was overrepresented by young people and distorted the results of the survey. The Huihui Mai engagement consisted of a dedicated youth engagement stream that

included workshops in schools and with youth organisations and a Youth Summit to review all the feedback. In the online survey, 81% of the respondents answered the question on their age, 18% of which were under 25 years of age. Stats NZ subnational population estimates for the three territorial authority areas that make up Greater Christchurch was 536,500 as of the 30th June 2022. Of this total population estimate, 163,260 are estimated to be aged under 25 years of age which represents 30.4% of the total population. Although there was a dedicated youth engagement programme during the Huihui Mai engagement, the results of the online survey respondents by age do not reveal that those under 25 years of age were overrepresented in terms of survey respondents nor were they overrepresented in terms of the proportion of the Greater Christchurch population under 25 years of age.

Recommendations:

We do not recommend specific changes to the draft Spatial Plan as a result of the above submissions. However, Section 4.1.2 has recommended that pages 2-7 be deleted which includes the results of the online survey of the Huihui Mai engagement.

4.12.2 Population

13 submissions were received on population projections. These submissions broadly consider that the chosen population projections are inappropriate due to an inaccurate base population and inaccurate underlying assumptions on births (fertility), deaths (mortality), and migration.

Various submitters consider that the assumptions about future demographic behaviour (birth rates, death rates, net migration) are inaccurate and invalidate the projections. Submitters consider that the assumptions on fertility (births) and mortality (deaths) are inaccurate as they do not account for a trend of falling birth rates and higher death rates. Submitters highlighted that into the future Greater Christchurch will be below replacement fertility, which is a total fertility rate of 2.1 children per woman, which equates to the average number of children each woman is required to have for a population to replace itself in the long term, without migration.

The population projections that have informed the Greater Christchurch Spatial Plan use the cohort component method which is international best practice for projecting future population. The cohort component method recognises that fundamentally only three factors can change the population: births (fertility), deaths (mortality), and migration. The population projections use the official Stats NZ Estimated Residential Population as the base population (2022) and official Stats NZ assumptions from the 2018-based projections. This means that the population projections are consistent with the Stats NZ projections, however they have been updated to a newer base year which provides a contemporary set of projections that reflect the growth that has eventuated between 2018 and 2022.

Natural increase (excess of births over deaths) is projected to decline gradually but steadily over the next few decades and is well accounted for in the assumptions that underpin projections. This means that a sizeable portion of future growth is projected to be as result of net migration gains. Stats NZ assumptions about future fertility (births), mortality (deaths), and migration are formulated

after analysis of short-term and long-term historical trends, government policy, and information provided by local planners.

Stats NZ produces a range of alternative projections to illustrate different scenarios for subnational population projections this includes three alternative projections designated as 'low', 'medium', and 'high'. The low projection uses low fertility, high mortality, and low net migration, the medium projection uses medium fertility, medium mortality, and medium net migration and the high projection uses high fertility, low mortality, and high net migration. These three scenarios were considered at the time of the most recent HCA and BCA. The three scenarios produced a projection range which was subsequently refined to a 'most likely projection'. This was undertaken by comparing recent growth trends, using population estimates and net new building consent data, with the three alternative projections produced by Stats NZ. For the Selwyn District and Waimakariri District the comparison determined that the high scenario was the most likely projection. For Christchurch City it was medium scenario. Stats NZ considers the mid-range projection as the most suitable for assessing future population changes, but also advises that customers make their own judgement on which projections best suit their purposes.

Various submitters submitted that the projections do not take into account the influence of non-demographic factors on future population such as war, catastrophe, epidemics and major government policy decisions and major business decisions. Population projections cannot anticipate these non-demographic factors which can invalidate the projections. Population projections are based on current policy settings, they do not try to anticipate major policy changes.

Various submitters raised concerns about using population projections to inform the Greater Christchurch Spatial Plan citing both historical under-projection and over-projection, with the focus of submissions being on the implications of over-projection on the draft Spatial Plan. Population projections are neither forecasts nor predictions. Population projections should be used as an indication of the overall trend, rather than as exact forecasts. Population projections form a basis for developing reasonable expectations about the future, giving an indication of the future size and structure of the population. This allows for well-informed evidence-based decision making. All population projections have uncertainty because the future is inherently uncertain. It is for this reason multiple scenarios are produced, and population projections are regularly revised to reflect new trends and to maintain their relevance and usefulness. To contextualise under-projection in the context of Greater Christchurch, during the development of the UDS in 2007, the Greater Christchurch population was expected to reach around 550,000 in 2041. The most recent Stats NZ subnational population estimates has the usually resident population of the three territorial authority areas combined as 536,500 as of the 30th June 2022. Stats NZ 2018 subnational population projections indicate that the population is fast-approaching exceeding the 550,000 mark.

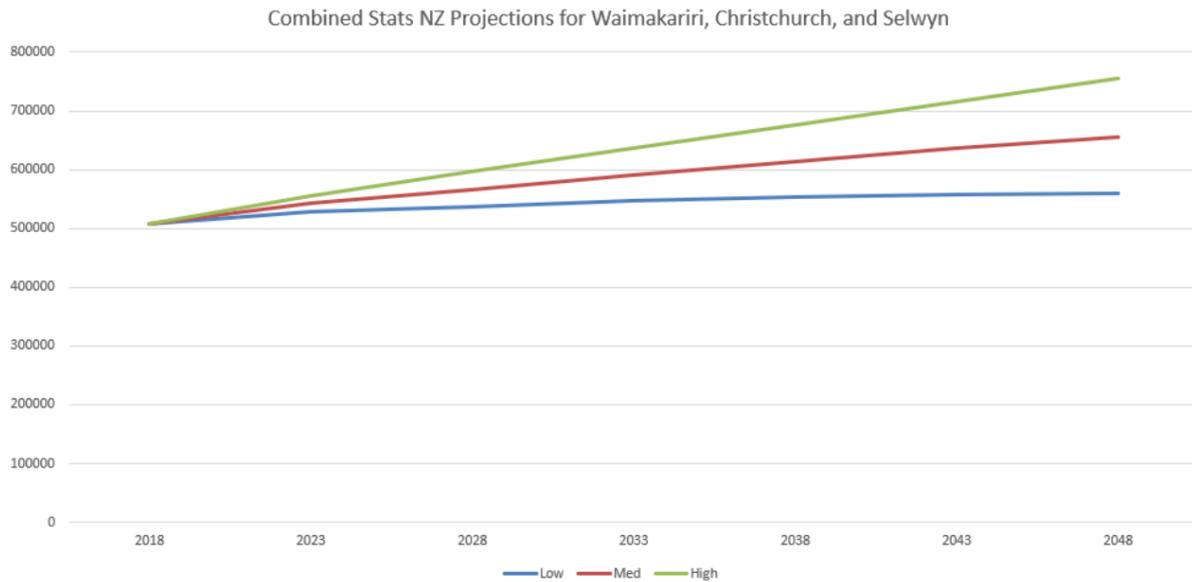


Figure 10: Stats NZ 2018 subnational population combined projections for Waimakariri, Christchurch, and Selwyn

Some submitters identified a disparity between the estimated and projected population of Greater Christchurch and what the draft Spatial Plan defines as Greater Christchurch. The description of Greater Christchurch is provided in the draft Spatial Plan and is stated to include “parts of three territorial authorities”. The geographic extent of Greater Christchurch is also shown on Map 1 of the draft Spatial Plan. The draft Spatial Plan states that the population of Greater Christchurch is approximately 530,000. This population number does not correspond to the description of Greater Christchurch in the draft Spatial Plan as the estimated usually resident population of the three territorial authority areas combined was 536,500 as of 30 June 2022. There are 208 statistical area 2 (SA2) boundaries (2022 boundaries) that closely approximate the spatial extent of Greater Christchurch as shown on Map 2 of the draft Spatial Plan.

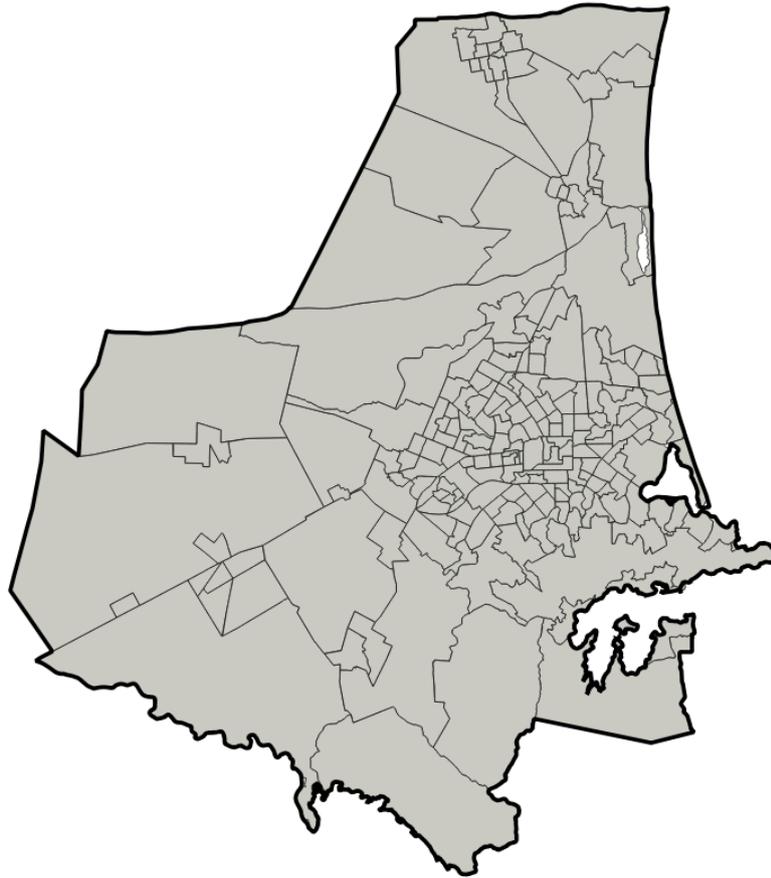


Figure 11: Stats NZ SA2 boundaries 2022 for Greater Christchurch

The total population of this area based on Stats NZ subnational population estimates at 30 June 2022 was 499,290. An update to the Stats NZ subnational population estimates for 30 June 2023 will be provided in October 2023, which is likely to find that the area of Greater Christchurch now exceeds half a million people (assuming a net population increase of 710). The HCA and BCA which informed the draft Spatial Plan established a study area that expanded beyond the area of Greater Christchurch to include all three territorial authority areas. The assessment of the sufficiency in the HCA and BCA applies to the urban environment of Greater Christchurch, therefore figures in the draft Spatial Plan on development capacity appropriately correspond to the area of Greater Christchurch. The population projections used in the draft Spatial Plan of 700,000 and 1 million correspond to the territorial authority area projections of Table 28 of the HCA. It is still prudent for the Spatial Plan to plan for sizeable growth, and the population numbers of 700,000 and 1 million remain useful for spatial planning purposes. As of 30 June 2022 the population of Greater Christchurch (499,290) represents over 93% of the population of the three territorial authority areas (population of 536,500). It is plausible that Greater Christchurch accommodates a greater share of the projected total population of the three territorial authority areas over the longer term than is currently projected. As a point of reference for spatial and strategic planning in Greater Christchurch, it is important that the population figures (estimates and projections) correspond to the area of Greater Christchurch. The use of the 700,000 and 1 million figure for spatial planning

purposes should have a loose time association which reflects the inherent uncertainty with population projections. The FDS component of the Spatial Plan should not however have a loose time association as it must apply to the long-term. The population projection of 700,000 that is associated with the long term can only indicate the overall trend rather than be relied upon as an exact forecast or prediction. The projected population of 700,000 is likely conservative for the long-term.

Recommendations:

The draft Spatial Plan should be amended to provide sufficient clarity on the definition of Greater Christchurch and population figures should be amended to correspond with the area of Greater Christchurch. The population figure of 1 million which is beyond the FDS component of the draft Spatial Plan should not be associated with a particular timeframe.

- a) Insert Greater Christchurch as a key term (page 10) in the draft Spatial Plan to provide a simplified description of Greater Christchurch, which should be the same or similar to the following:

Greater Christchurch is described in detail in the Greater Christchurch Spatial Plan, however it is generally understood as the area covering the eastern parts of Waimakariri and Selwyn Districts Councils and the metropolitan area of Christchurch City Council, including the Lyttelton Harbour Basin. It includes the towns of Rangiora, Kaiapoi and Woodend/Pegasus to the north and Rolleston, Lincoln and West Melton to the south-west. The extent of Greater Christchurch is shown on Map 2 of the Greater Christchurch Spatial Plan.

- a) Amend the text on page 13 as follows:

Over the past 15 years, **Greater** Christchurch and its surrounding towns have **has** grown rapidly **to a population of around half a million**. By 2050, ~~more than~~ **up to** 700,000 people are projected to **could** be living in Greater Christchurch – ~~340%~~ more than there are today, with the population potentially doubling to 1 million people **in the future**. ~~within the next 60 years, if not earlier.~~

- b) Amend the text on page 19 as follows:

Greater Christchurch's population ~~exceeds~~ **of around** half a million people ~~which~~ represents more than 80 percent of the Waitaha / Canterbury population and almost half of the Te Waipounamu / South Island population.

- c) Amend the text on page 26 as follows:

The latest projections from Stats NZ indicate Greater Christchurch's population ~~will~~ **could** grow from a population of approximately ~~530,000~~ **half a million** to ~~more than~~ **around** 700,000 by 2051. ~~This is around 170,000 more people and 77,000 more households.~~

If Greater Christchurch was to grow at the rate seen over the last 15 years, then it could reach a population of 700,000 within the next 25 to 30 years and in time one million within the next 60 years, doubling the size of today's population.

4.12.3 National Policy Statement on Urban Development 2020

49 submission points were coded to the NPS-UD. These submitters generally considered that the draft Spatial Plan does not give effect to the NPS-UD nor meet the requirements of an FDS under the NPS-UD.

Seven submission points were coded to Policy 1 of the NPS-UD, all of which considered that the draft Spatial Plan did not give effect to Policy 1 of the NPS-UD. Policy 1 of the NPS-UD states that planning decisions contribute to well-functioning urban environments. The NPS-UD states that a planning decision means a decision on any of the following:

- a) a regional policy statement or proposed regional policy statement
- b) a regional plan or proposed regional plan
- c) a district plan or proposed district plan
- d) a resource consent
- e) a designation
- f) a heritage order
- g) a water conservation order
- h) a change to a plan requested under Part 2 of Schedule 1 of the Act

Decisions on the draft Spatial Plan do not constitute a planning decision as defined by the NPS-UD. However, the purpose of an FDS includes setting out how a local authority intends to achieve well-functioning urban environments in its existing and future urban areas. The CRPS states that the Greater Christchurch Tier 1 urban environment is the area shown on Map A of the CRPS. The area shown on Map A of the CRPS corresponds to the extent of Greater Christchurch in the draft Spatial Plan. Objective 1 of the NPS-UD is that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Well-functioning urban environments has the meaning provided in Policy 1 of the NPS-UD, therefore Policy 1 must be relied on for an understanding of any and all mentions of well-functioning urban environments in the NPS-UD including clause 3.13(1)(a)(i).

15 submission points, inclusive of the seven submission points coded to Policy 1 of the NPS-UD, inferred that the draft Spatial Plan does not achieve the purpose of an FDS in respect of setting out how a local authority intends to achieve well-functioning urban environments in its existing and future urban areas. The Whakawhanake Kāinga Komiti Memorandum of Agreement states the priority of the Komiti is to create a well-functioning and sustainable urban environment and that in achieving this, priority will be given to:

- a. Decarbonising the transport system
- b. Increasing resilience to natural hazards and the effects of climate change
- c. Accelerating the provision of quality, affordable housing
- d. Improving access to employment, education and services.

This priority of the Komiti is outlined on page 22 of the draft Spatial Plan. The entirety of the draft Spatial Plan sets out how the partnership intends to achieve a well-functioning urban environment for Greater Christchurch. This applies to both existing urban areas, as well as future urban areas.

Various submitters consider the draft Spatial Plan does not satisfy clause 3.13(2) of the NPS-UD on what is required to be spatially identified in an FDS. Submissions predominately concentrated on clause 3.13(2)(a) of the NPS-UD, with submitters considers that the draft Spatial Plan does not spatially identify the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas. Clause 3.13(2)(a) of the NPS-UD states that the broad locations to be spatially identified are to meet the requirements of clauses 3.2 and 3.3 of the NPS-UD which pertains to providing at least sufficient development capacity to meet expected demand for housing and business land over the long term.

Some submitters considered that the draft Spatial Plan does not spatially identify the broad locations to provide for development capacity over the long term. They cited the insufficient development capacity identified in tables 2, 3, and 4 of the draft Spatial Plan as the rationale for spatially identifying the broad locations of new greenfield areas for housing and business to satisfy the requirements of clause 3.13(2)(a) of the NPS-UD. These submitters consider that there was a purposeful omission in the draft Spatial Plan of spatially identifying the broad locations of future urban areas citing GPAs and FUDAs of previous spatial planning processes. Furthermore, they consider that the capacity assessments overestimate capacity and underestimate demand and that these assessments were not undertaken at a level of sufficient detail to account for locational demand, demand by type of dwelling and suitably distinguishing between business sectors.

Map 14 of the draft Spatial Plan spatially identifies the broad locations of housing and business development capacity over the long term. Map 2 provides for the broad locations of housing and business development capacity beyond the long-term and thus does not form part of the FDS component of the draft Spatial Plan. Map 14 includes new/expanded industrial areas, growth around the network of urban and town centres, growth around corridors existing urban areas, approved plan changes not yet operative and future urban development areas and private plan changes made operative and available for development. These elements are also shown on Map 2. The Priority Areas also represent the spatial identification of broad locations in which development capacity will be provided over the long term.

Since the development of the draft Spatial Plan, there have been significant supply side changes in Greater Christchurch, including private plan changes, district plan reviews, IPIs required by the RMA-EHS and the approval of referred projects under the COVID-19 Recovery (Fast-track Consenting) Act 2020. Notably decisions on submissions to the Selwyn Proposed District Plan and IPI were publicly notified on 19 August 2023. Supply-side changes have altered the status of elements on both Map 14 and Map 2. A number of submitters have requested that maps in the Spatial Plan be updated to reflect recent plan change processes and rezoning decisions on the DPR and IPI process.

The broad areas spatially identified in Map 14 are a response to the long-term shortfalls which the draft Spatial Plan confirms will be supplemented by exploring improving the feasibility of intensification, especially around centres and public transport routes, and increasing minimum

densities for new greenfield areas. Improving the feasibility of intensification takes into account that a significant amount of plan-enabled supply is not reasonably developable or commercially feasible in the long term without intervention.

Table 15: Plan-Enabled and Feasible Capacity for the Long Term 2021 – 2051

Greater Christchurch Urban Capacity	Feasible Capacity Long Term 2021 – 2051	Plan-Enabled Capacity Long Term 2021 – 2051
Waimakariri	14,450	79,345
Christchurch	94,000	544,000
Selwyn	24,100	118,554
Total	132,550	741,899

The HCA determined that less than 18% of the long-term plan enabled capacity was feasible. Since the most recent HCA was prepared, the plan enabled capacity in Greater Christchurch has significantly increased. Exploring interventions for improving the feasibility of intensification constitutes an appropriate response to the insufficiency as it recognises that the insufficiency is not wholly a result of RMA planning documents. In terms of greenfield, the HCA determined that an increase from 15hh/ha to 16hh/ha would meet the long-term shortfall for housing.

In terms of housing development capacity, submitters broadly consider that the approach of the draft Spatial Plan would result in mismatches between supply and demand with a view that there will be more demand for standalone houses in greenfield areas and less demand for attached dwellings in brownfield areas. The draft Spatial Plan acknowledges that the intensification focus of the Spatial Plan needs to be combined with continuing to provide for some greenfield areas in appropriate locations over the longer term. The assessment and recommendations on submissions received on greenfield is outlined in Sections 4.5.3 and 4.5.4 of the Officer’s Report.

Submitters consider that if the draft Spatial Plan is to perform the function of an FDS then the draft Spatial Plan must spatially identify the development infrastructure and additional infrastructure required to support or service development capacity, along with the general location of the corridors and other sites required to provide it, as well as spatially identifying any constraints on development.

Part 1 of the draft Spatial Plan on ‘areas to protect, avoid and enhance’ encompasses Map 5 which represents a layering of all the areas to protect and avoid, highlighting the most constrained areas of Greater Christchurch for development. Additional maps in Part 1 of the draft Spatial Plan, being Maps 6-10, support Map 5 by spatially identifying other constraints on development. Map 11 and Map 12 also spatially identifying other constraints. Maps 5-12 satisfy the requirement to spatially identifying any constraints on development as required by clause 3.13(2)(c) of the NPS-UD.

Clause 3.13(2)(b) of the NPS-UD sets a requirement to spatially identify development infrastructure and additional infrastructure, required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it. Policy 10 of the NPS-UD requires tier 1 local authorities to engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning. Clause 3.15(2) of the NPS-UD reinforces Policy 10, requiring local authorities to engage with providers of additional infrastructure and the relevant providers of nationally significant infrastructure when preparing a draft FDS. In order to prepare the draft Spatial Plan, targeted engagement with 'urban development partners' was undertaken which included providers of development infrastructure and additional infrastructure. The NPS-UD sets a differential framework for infrastructure, in particular development infrastructure and additional infrastructure in relation to development capacity. Under the NPS-UD development capacity means the capacity of land to be developed for housing or for business use, based on:

- a. the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
- b. the provision of adequate development infrastructure to support the development of land for housing or business use.

In terms of development capacity, development infrastructure is the principal infrastructure consideration as it is the only determinant as to whether development capacity is infrastructure-ready. Clause 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. Additional infrastructure is still a key consideration in the NPS-UD, although it has a different status.

Submitters, particularly providers of additional infrastructure, highlighted the importance of additional infrastructure in supporting the growth, development and change anticipated for Greater Christchurch in the draft Spatial Plan. Clause 3.13(2)(b) of the NPS-UD requires a determination be made on spatially identifying development infrastructure and additional infrastructure required to support or service development capacity, rather than spatially identifying all development infrastructure and additional infrastructure over the long term. Clause 3.13(2)(b) of the NPS-UD is satisfied by Maps 2, 3, 9, 10, 14 and 15. However, it must be acknowledged that the draft Spatial Plan does not spatially identify a complete set of development infrastructure and additional infrastructure required to support or service that development capacity. A number of submitters identified that the spatially identified development and additional infrastructure was incomplete. The draft Spatial Plan has made a determination as to what is practical and appropriately considered at the spatial scale of the Spatial Plan, and what is appropriate to defer to subsequent processes. MRT is a clear focal point of the draft Spatial Plan as a city shaping project that will enable significant development capacity and influence a substantial shift in urban form. A more comprehensive assessment and list of recommendations on the submissions received, including changes to the aforementioned maps is outlined in the relevant opportunities' sections of the Officer's Report.

Transpower New Zealand Limited has sought clarification in the draft Spatial Plan on the relationship between strategic infrastructure and the NPS-UD terms of development infrastructure and additional infrastructure. A number of key terms in relation to infrastructure are used throughout the draft Spatial Plan. The CRPS defines strategic infrastructure as 'those necessary facilities, services

and installations which are of greater than local importance and can include infrastructure that is nationally significant'. In the context of the draft Spatial Plan, Map 9 is clear as to what constitutes key strategic infrastructure. Development infrastructure and additional infrastructure are defined by the NPS-UD. The relationship between strategic infrastructure, development infrastructure and additional infrastructure is not explicit in the draft Spatial Plan. However, development infrastructure and additional infrastructure are not terms used within the draft Spatial Plan (except for the instance that development capacity is defined as a key term). It is appropriate to consider the wider policy framework for the relationship between strategic infrastructure, development infrastructure and additional infrastructure. Strategic infrastructure is broader, as it includes infrastructure that would meet the definitions of development infrastructure and additional infrastructure.

Submitters indicated that the draft Spatial Plan, as an FDS, was not sufficiently clear in outlining what had informed the draft Spatial Plan including the requirements of clause 3.14 of the NPS-UD and in particular clause 3.14(f). Clause 3.14(f) of the NPS-UD requires that an FDS be informed by every other National Policy Statement under the RMA, including the New Zealand Coastal Policy Statement. Figure 5 of the draft Spatial Plan, visually depicts what has informed the draft Spatial Plan, this is shown below in Figure 12:

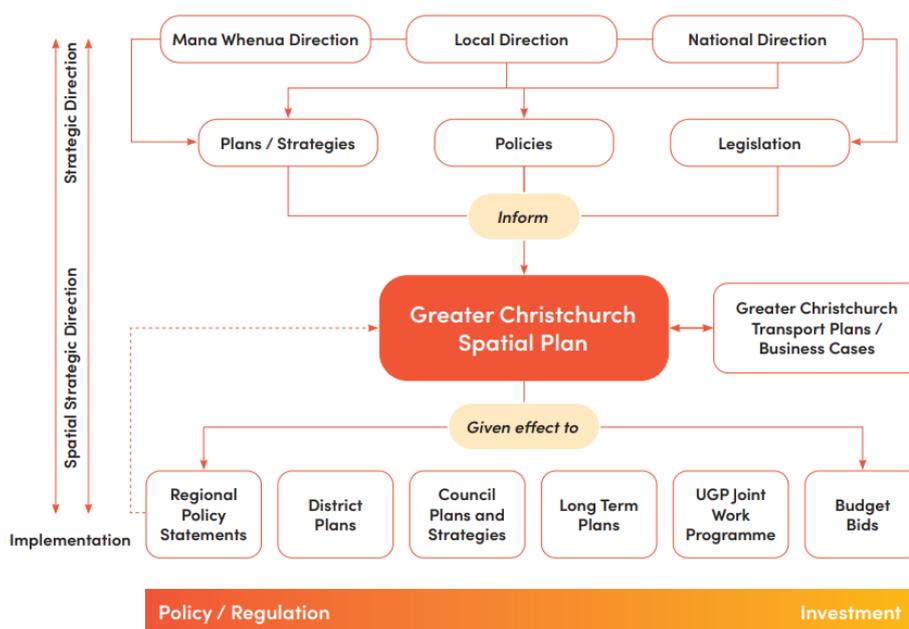


Figure 12: Planning context for the Spatial Plan²¹³

Although Figure 5 of the draft Spatial Plan asserts that national direction, which encompasses national policy statements, are an input into the draft Spatial Plan, this is not made sufficiently clear elsewhere. Submitters noted that the draft Spatial Plan identifies “relevant national direction” and “other national policy statements relating to highly productive land and freshwater management”.

²¹³ It is recommended in Section 4.1.2 that the ‘inform’ in Figure 5 is amended to ‘informed by’ and the ‘given effect to’ in Figure 5 is changed ‘informs’.

This does not meet the requirements of clause 3.14 of the NPS-UD nor does it align with what is visually depicted by figure 5 of the draft Spatial Plan.

Six submission points were made in relation to the implementation and review requirements of an FDS. Submitters consider that the draft Spatial Plan does not meet the review requirements of the NPS-UD as the draft Spatial Plan states that a review is to be undertaken every five years whereas the NPS-UD requires the review be done in time to inform the next long-term plan (ie, every 3 years). Clause 3.12(5) of the NPS-UD states that an FDS may be prepared and published as a stand-alone document, or be treated as part of any other document (such as a spatial plan). In the case of the draft Spatial Plan, while it incorporates an FDS component, the draft Spatial Plan is much broader than an FDS. The review of the FDS component of the draft Spatial Plan, and the review of the draft Spatial Plan in its entirety, should be clearly distinguished. The distinction between the two is not sufficiently clear in the draft Spatial Plan at present and warrants clarification. The rationale behind a review of the draft Spatial Plan every five years is that it provides the opportunity to incorporate the latest release of census information from Stats NZ. This is intended to ensure that future iterations of the Spatial Plan can respond to changing demographic, social, economic and cultural factors. This would also ensure that the FDS component of the draft Spatial Plan is updated at least every six years as required by clause 3.12(1)(a) of the NPS-UD. The requirement to review the FDS component every three years should be made clear in the draft Spatial Plan. As currently drafted, there is seemingly a requirement of the NPS-UD in relation the review of an FDS not met.

Some submitters also consider that to meet the requirements of an FDS, the draft Spatial Plan must include an implementation plan. The NPS-UD requires the preparation and implementation of an implementation plan for an FDS which must be updated annually. Clause 3.18(4)(a) of the NPS-UD states that an implementation plan or part of an implementation plan is not part of the FDS to which it relates. In the monitoring section of the draft Spatial Plan, there is a commitment that the partnership will establish an implementation plan. At the time of preparing the implementation plan, the partnership will need to ensure that the implementation plan satisfies the requirements of clause 3.18 of the NPS-UD.

Recommendations:

- a) Amend the Joint Work Programme section of the draft Spatial Plan (page 89) to satisfy the requirements of clause 3.16 of the NPS-UD on the regularity of the review of the FDS. The new wording should be as follows:

The plan will be reviewed and updated (as needed) every five years. **The Future Development Strategy component of the plan will be reviewed and updated (as needed) every three years.**

- b) Amend the Joint Work Programme section of the draft Spatial Plan, under the Monitoring heading (page 92) to satisfy the requirements of clause 3.16 of the NPS-UD on the regularity of the review of the FDS. The new wording should be as follows:

This will ensure that future iterations of the plan can respond to changing demographic, social, economic and cultural factors. **The Future Development Strategy component of the**

plan will be reviewed every three years following the preparation of the latest Housing and Business Development Capacity Assessment.

- c) Amend the legend of maps 2 and 14 (pages 29 and 79 respectively) 'growth around central city, centres and corridors' to correspond to the symbology on the maps.
- d) Amend maps 2 and 14 (pages 29 and 79 respectively) to reflect resultant changes and the status of private plan changes, district plan reviews, IPIs and referred projects under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

- e) Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by inserting the following (page 70):

...more at incentivisation, partnerships and investment. **A broad range of statutory and non-statutory tools will be relied upon for improving the feasibility of intensification to support the desired pattern of growth.**

- f) Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by amending the purpose of the statutory tools action/initiative (page 90) as follows:

To assess, propose and implement the suite of statutory tools that will give effect to the Spatial Plan, **improve the feasibility of intensification**, and enable delivery of the joint work programme.

- g) Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by amending the purpose of the non-statutory tools action/initiative (page 90) as follows:

To assess, propose and implement the suite of non-statutory tools that will give effect to the Spatial Plan, **improve the feasibility of intensification**, and enable delivery of the joint work programme.

- h) Amend the section on delivering on national direction (pages 22 and 23) as follows:

The Spatial Plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development. This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.

Relevant national ~~policy direction~~ **that has informed the Spatial Plan** includes the ~~National Policy Statement on Urban Development~~, Government Policy Statement on Housing and Urban Development, Government Policy Statement on Land Transport, the Emissions Reduction Plan, and **every** other national policy statements relating to highly productive land and freshwater management **under the Resource Management Act 1991.**

~~The Spatial Plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development. This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.~~

- i) Amend Figure 5: Planning context for the Spatial Plan of the draft Spatial Plan (page 24) to include the evidence-base, feedback received through the Huihui Mai engagement and pre-emptively the feedback received through the consultation as the missing items required by clause 3.18 of the NPS-UD that have informed the draft Spatial Plan.

4.13 Other Feedback

Submissions

This section considers submission points coded to 'Other Feedback - General'.

A total of 76 submission points were coded to 10 - Other feedback - General. 27 submissions were generally in support, 12 submission points were opposed, while 37 did not specify support or opposition. Many of the comments in this section do not request amendments to the GCSP.

In the list below the 'Other Feedback - General' issues raised are summarised. Those with an asterisk contain issues addressed elsewhere in this report. Submission points that officers have assessed as not requiring changes to the GCSP are identified with a double asterisk, and are not discussed further. These submission points do not seek any specific changes to the GCSP or are very general so that it is not clear whether any changes are sought. Some submitters in this category may wish to clarify the relief they seek at the hearings.

Issues raised:

General

- Stormwater and wastewater management: will the sewer systems cope adequately in high density areas; will stormwater upgrades be needed from increased rooftops and sealed street surfaces? *
- Rezone to 'future residential' the property north of Woodend Ravenswood. *
- Should improve already existing infrastructure. **
- Plan needs to provide easy exit from urban to wider outdoors – UN agenda for removing private vehicle use and removing council parking. *
- The East is forgotten, consultation with this community needed. *
- Community consultation required re control systems supported by AI. **
- Better communication needed about why this plan is important. **
- The opportunities are racist, divisive and include woke ideologies. **
- Who determines what qualifies as areas of significant natural value and what total area of these areas are needed? **
- Put light industrial under the airport noise boundary so areas near railway line can be rezoned mixed use. *
- Congestion tolls will be needed to reduce emissions, with 1M population the roads will be full. *
- Sign-off and market the 1st Urban Great Walk (Christchurch 360 Trail) and mark ancient trails through the region by symbolic planting of Ti Kouka and kowhai. **
- Address means of bringing people together and caring for each other post March 15. **
- Partner research and engineering school; build stronger town and gown relationship. **
- There are a lot of tiny cheaply built apartments popping up in St Albans with very little thought for green space or trees. **
- In Japan you must prove you have a place to park before you can purchase a car. This will often be a private paid carpark in the neighbourhood. People park cars on footpaths as there is no room on narrow roads, and will get worse with the increase of multi apartments. **

- Need provision of space for places of worship for religious communities; the plan’s narrative is entirely secular when it seems to sum up life as to “live, work, shop, recreate and socialise” (page 57). Worship is still a part of the lives of many people of Christchurch, and this should be acknowledged in the draft spatial plan.
- Supportive of priority development areas but there is no incentive for any denser development in this area at the moment (Papanui Central). **
- Where are we going to house these migrants when we cannot house our growing number of homeless people? Should immigrants be given priority over our own New Zealanders who live here? **
- Core to well-functioning urban environments is infrastructure such as telecommunications and electricity. *
- No 15-minute cities. *
- Not enough housing is being enabled or planned for. *
- Strongly disagrees with anything that destroys the old established character and buildings of Christchurch.
- Strongly disagree with high rise, high density housing. **
- This proposal would be an artificial construct forced on people. **
- Will land be required by government acquisition to do this? **
- New Brighton should be designated as locally important. *
- Residents need to be included in discussion. **
- Fully agree with prioritising Te Tiriti obligations. **
- Our city was a wealthy city and due to under insurance by the CCC we have been slow to recover from the 2010/11 earthquakes. **
- Surely some of the red zone could be reused for housing giving people green spaces to live in? *
- Concern at fact that youth have been targeted (see page 5); their sheer youth places them in a position of poorly understanding the nuances and complexity of issues in the real world. **
- The freight network needs to be enhanced by improving railway lines, so that passenger trains can also operate on them. *
- If the population is to grow as expected, then there will be a need for a tertiary education provider in North Canterbury. **

Response to submissions

4.13.1 Consideration of Religious Communities

One submitter has pointed out that the GCSP does not mention religious/spiritual aspects of life in greater Christchurch and the needs of religious communities. We agree that religion, religious institutions or assets are not separately discussed in the plan while social, cultural, economic (e.g., employment) and recreational assets are. The various existing religious institutions (some of which are substantial) are not identified on the maps and no specific mention is made of the need to provide for religious places or spaces in new growth areas. At this point in time, it is not proposed to undertake the work required to consider or recognise religious spaces, places, and assets but we consider it should be identified as a matter for the next review of the GCSP. In the meantime, a small addition is proposed to recognise that religion is an important part of life for some residents of

Greater Christchurch and contributes to economic and social vitality, and is a relevant consideration in the spatial planning context.

Recommendations:

- a) Amend the first paragraph on page 74 as follows:

Community facilities contribute to strong, healthy and vibrant communities by providing spaces where residents can connect, socialise, learn and participate in a wide range of social, cultural, religious, art and recreational activities.

5. Appendices

Appendix 1 – Submission Points by Theme (with location of Officer response to submission Points)

Note: This appendix is provided as separate links on the GCP website:

<https://greaterchristchurch.org.nz/urbangrowthprogramme/draft-greater-christchurch-spatial-plan/>

Appendix 2 – Submission Points by Submitter (with location of Officer response to submission Points)

Note: This appendix is provided as separate links on the GCP website:

<https://greaterchristchurch.org.nz/urbangrowthprogramme/draft-greater-christchurch-spatial-plan/>

Appendix 3 – Reporting Officer Recommendations

Ref.	GCSP page no.	Recommended change	Report Section ref.
1.	2-7	Delete pages 2-7 that explained how to be involved and summarises the results of the online survey of the Huihui Mai engagement.	4.1.2
2.	9	Amend Opportunity 4 as follows: Enable diverse, quality , and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs.	4.5.2
3.	9	Amend Opportunity 6 as follows: Prioritise sustainable and accessible transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.	4.7.5
4.	10	Insert Greater Christchurch as a key term (page 10) in the draft Spatial Plan to provide a simplified description of Greater Christchurch, which should be the same or similar to the following: <u>Greater Christchurch is described in detail in the Greater Christchurch Spatial Plan, however it is generally understood as the area covering the eastern parts of Waimakariri and Selwyn Districts Councils and the metropolitan area of Christchurch City Council, including the Lyttelton Harbour Basin. It includes the towns of Rangiora, Kaiapoi and Woodend/Pegasus to the north and Rolleston, Lincoln and West Melton to the south-west. The extent of Greater Christchurch is shown on Map 2 of the Greater Christchurch Spatial Plan.</u>	4.12.2
5.	11	Delete ‘Social Infrastructure’ as a Key Term (page 11) in the Spatial Plan.	4.5.2
6.	13	Amend the text on page 13 as follows: Over the past 15 years, Greater Christchurch and its surrounding towns have has grown rapidly to a population of around half a million . By 2050, more than up to 700,000 people are projected to could be living in Greater Christchurch – 340% more than there are today, with the population potentially doubling to 1 million people in the future . within the next 60 years, if not earlier.	4.12.2
7.	13	Amend paragraph 6 as follows: Its key overarching directions include a focus on targeted intensification in centres and along public transport corridors...	4.1.1
8.	14	Amend the Vision Statement to read as follows: The Spatial Plan seeks to deliver on the collective community aspirations for the future of Greater Christchurch – as a place that supports the wellbeing of residents both now and for generations still to come where the interrelationship between people and nature underpins a focus on intergenerational wellbeing, and positions Greater Christchurch to be a place that supports the wellbeing of generations still to come.	4.1.1

9.	19	Amend Paragraph 4 as follows: The introduction increased ownership of private cars during the middle of the 20 th century also enabled the urban area to develop beyond the inner city....	4.1.2
10.	19	Amend paragraph 5 a follows: ...It resulted in the permanent displacement of whole neighbourhoods in the eastern areas of Christchurch and in Kaiapoi, and demolition of many buildings in Christchurch's Central City. <u>This included demolition of a significant number of Heritage Listed buildings.</u>	4.1.2
11.	19	Amend the text on page 19 as follows: Greater Christchurch's population exceeds of around half a million people, which represents more than 80 percent of the Waitaha / Canterbury population and almost half of the Te Waipounamu / South Island population.	4.12.2
12.	22-23	Amend the section on delivering on national direction (pages 22 and 23) as follows: <u>The Spatial Plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development. This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.</u> Relevant national policy direction that has informed the Spatial Plan includes the National Policy Statement on Urban Development, Government Policy Statement on Housing and Urban Development, Government Policy Statement on Land Transport, the Emissions Reduction Plan, and every other national policy statements relating to highly productive land and freshwater management under the Resource Management Act 1991. The Spatial Plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development. This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.	4.12.3
13.	24	Amend Figure 5: Planning context for the Spatial Plan by replacing 'Inform' with ' <u>Informed by</u> ' and 'Give effect to' with ' <u>Informs</u> '.	4.1.2
14.	24	Amend Figure 5: Planning context for the Spatial Plan of the draft Spatial Plan to include the evidence-base, feedback received through the HuiHui Mai engagement and pre-emptively the feedback received through the consultation as the missing items required by clause 3.18 of the NPS-UD that have informed the draft Spatial Plan.	4.12.3
15.	25	Amend the third bullet point under 'Related planning processes currently underway' as follows:	4.4.4 and 4.10.2

		Canterbury Regional Council is reviewing the <u>regional planning framework for Canterbury. A new Regional Policy Statement is expected to be notified at the end of 2024. This process seeks to align the regional planning framework with national direction such as the National Policy Statement for Freshwater Management 2020, including Te Mana o te Wai. It also Regional Policy Statement, which</u> includes a review of the airport noise contours <u>relating to Christchurch International Airport, mapping of highly productive land, and development of developing</u> significance criteria for new greenfield areas; as well as the Regional Coastal Environment Plan and the Land and Water Regional Plan. This review will also continue to consider, and direct, how to manage urban growth in balance with activities that occur in the rural environment.	
16.	25	Add a new bullet point after the last bullet point under the heading 'Related planning processes currently underway' as follows: <u>The Christchurch City Council is undertaking a Coastal Hazards Adaptation Framework with its coastal communities to create adaptive pathways to respond to coastal hazard risks. It is anticipated that this work will inform future changes to the District Plan. It is also anticipated that a new law 'the Climate Adaptation Act' will assist in responding to complex legal and technical issues associated with managed retreat when it is enacted.</u>	4.3.3
17.	26	Amend the text on page 26 as follows: The latest projections from Stats NZ indicate Greater Christchurch's population will <u>could</u> grow from a population of approximately 530,000 <u>half a million</u> to more than <u>around</u> 700,000 by 2051. This is around 170,000 more people and 77,000 more households. If Greater Christchurch was to grow at the rate seen over the last 15 years, then it could reach a population of 700,000 within the next 25 to 30 years and <u>in time</u> one million within the next 60 years , doubling the size of today's population.	4.12.2
18.	29	Add a notation to Map 2 as follows: <u>Ecological enhancement / greenbelt: The dashed lines are an approximate representation of the location of ecological enhancement / greenbelt areas, to be further investigated.</u>	4.4.5
19.	29	Amend Map 2 to align with new / expanded business (industrial and commercial areas) that were rezoned by the partially operative Selwyn District Plan.	4.8.6
20.	29	Amend Map 2 to reflect resultant changes and the status of private plan changes, district plan reviews, IPIs and referred projects under the COVID-19 Recovery (Fast-track Consenting) Act 2020.	4.12.3
21.	29	Amend Map 2 to include any existing LLRZ in Greater Christchurch as part of the existing urban area.	4.5.1
22.	29	Amend Map 2 to correctly show the Ōpāwaho Heathcote River.	4.1.2

23.	26	Amend legend item of Map 2 'growth around central city, centres and corridors' to correspond to the symbology on the maps.	4.12.3
24.	29	Identify Prebbleton on Map 2 as a 'Locally important urban centres and town'.	4.6.1
25.	30	Rename 'Directions' to ' Overarching Directions' and add a new label ' Directions ' for Direction's 1.1 to 6.5.	4.1.1
26.	30	Amend Direction 1.1 as follows: 1.1 Avoid urban development over Protect Wāhi Tapu from urban development	4.2
27.	30	Insert new Direction as follows: 1.3 Protect, recognise, and restore the historic heritage of Greater Christchurch.	4.2
28.	30	Amend Direction 3.1 as follows: 3.1 Avoid development in Protect areas with significant natural values	4.4.1
29.	31	Amend Opportunity 4 as follows: Enable diverse, quality , and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs.	4.5.2
30.	31	Amend Direction 4.2 as follows: Ensure at least sufficient development capacity is provided or planned for to meet demand	4.5.2
31.	31	Amend Direction 4.5 as follows: Deliver thriving neighbourhoods with quality developments, quality housing and supporting community infrastructure.	4.5.2
32.	31	Amend Direction 5.1 as follows: At least sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.	4.8.5
33.	31	Amend Direction 5.3 as follows: Direction 5.3 Provision of strategic infrastructure that is resilient, efficient, integrated and meets the needs of a modern society and economy.	4.10.1
34.	31	Insert a new direction 5.4 as follows: 5.4 Urban growth occurs in locations that do not compromise the ability of primary production activities to expand or change, including adapting to a lower emissions economy.	4.6.2
35.	31	Insert a new direction 5.5 as follows: 5.5 Urban Growth occurs in locations and patterns that protects strategic regionally and nationally important tertiary institutes.	4.6.2
36.	31	Amend Opportunity 6 as follows: Prioritise sustainable and accessible transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.	4.7.5

37.	35	Add Prebbleton to the list of locations of ‘Locally important urban centres and towns’	4.6.1
38.	37	Amend the reference to ‘community infrastructure’ on pages 37 as follows: Rolleston is a strong residential growth node with high quality community infrastructure and a developing town centre providing retail and hospitality.	4.5.2
39.	41	Amend first sentence on page 41 under Figure 7 to revised Opportunity 6 wording: Prioritise sustainable and accessible transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.	4.7.5
40.	45	Insert new blue-green network Principle as follows: <u>Healthy waterbodies: Valuing, respecting, and prioritising the health and wellbeing of waterbodies, recognising the vital importance of water.</u>	4.4.2
41.	51	Amend the second sentence on page 51 as follows: This includes identifying areas to protect given their intrinsic values and importance, such as sites and areas of significance to Māori, and areas with significant natural features or landscapes; and areas to avoid given they are subject to natural hazards, <u>noting in some circumstances mitigation may also be appropriate.</u>	4.3.4
42.	51	Amend the heading ‘Areas to avoid’ in the blue box as follows: ‘Areas to avoid <u>or mitigate</u> ’	4.3.4
43.	51	Amend the first sentence in the second paragraph on page 51 as follows: The methodology and reasoning for identifying the areas to protect and avoid, <u>or potentially mitigate,</u> is set out in the Areas to Protect and Avoid Background Report. The sites...	4.3.4
44.	51	Amend the first sentence of the third paragraph on page 51 as follows: Layering all the areas to protect and avoid <u>or mitigate</u> on top of each other highlights the most constrained areas of Greater Christchurch for development (see Map 5). These areas...	4.3.4
45.	51	Amend the second sentence of paragraph 4 as follows: It is acknowledged that for flood hazard areas, the map shows differing return periods as the basis for areas to avoid, <u>or mitigate,</u> based on the best available mapping information from each territorial authority.	4.3.4
46.	52	Amend the title of Map 5 from ‘Areas to protect and avoid’ to ‘Key constraint areas’ as follows: Map 5: Areas to protect and avoid <u>Key constraint areas</u>	4.3.4

47.	52	Amend the legend to Map 5 by deleting reference to 'Areas to Protect and Avoid' and replacing with 'Key constraint areas'.	4.3.4
48.	52	Amend Map 5 as follows: <ul style="list-style-type: none"> • Identify Lyttelton Port and the inland ports • Identify National Grid assets. <p><i>Note: Changes to other maps will result in consequential changes to Map 5 as this a 'heat' map combining other maps in the draft Spatial Plan.</i></p>	4.10.1
49.	53	Amend the opening text under Opportunity 1 as follows: The area that encompasses Greater Christchurch is part of a wider landscape that holds significant historic and contemporary cultural associations and importance for Ngāi Tahu whānui, reflecting their occupation of the area for more than 1,200 years. The Spatial Plan recognises the importance of protecting the sites and areas of significance to Māori for generations to come, and that Papatipu Rūnanga are the entities responsible for the protection of tribal interests within their respective takiwā'. <u>The Greater Christchurch area also has sites and buildings that are of importance in reflecting the historic heritage of the area. The Spatial Plan recognises the importance of protecting these sites and areas and integrating them into the urban environment for continued retention and viability.</u>	4.2
50.	53	Amend Direction 1.1 as follows: 1.1 Avoid urban development over <u>Protect</u> Wāhi Tapu <u>from urban development</u>	4.2
51.	53	Amend Direction 1.1 as follows: 1.1 Avoid urban development over <u>Protect</u> Wāhi Tapu <u>from urban development</u>	4.2
52.	54	Insert new Direction in the 'Blue Box' tilted 'Direction' as follows <u>1.3 Protect, recognise, and restore the historic heritage of Greater Christchurch.</u>	4.2
53.	54	Insert a new direction and related text (after the 'blue box') as follows: <u>1.3 Protect, recognise, and restore the historic heritage of Greater Christchurch.</u> <u>Greater Christchurch has many significant heritage sites, areas, and associated values, which should be recognised in urban development and protected from inappropriate activities. In providing this protection there will be tension with the direction for greater intensification and the pressures this may bring on historic heritage sites and areas. The challenge to this will be balancing the protection of historic heritage with providing for greater intensification and a changing urban environment. However, as a matter of national importance under the Resource Management Act 1991, historic heritage values are given greater consideration over intensification.</u>	4.2

54.	56	Amend the last bullet point under Context on page 56 as follows: In a global context, greenhouse gas emissions on a per capita basis are extremely high in Greater Christchurch. An emissions inventory for Christchurch City for the 2018/19 financial year showed that more than half of its total emissions came from the transport sector. <u>It is acknowledged that achieving a low carbon future for Greater Christchurch will require the provision of reliable renewable energy.</u>	4.3.5
55.	57	Amend the 3rd paragraph under direction 2.1 (page 57) as follows: It is essential that urban development is directed away from areas that are at significant risk from natural hazards <u>where that risk cannot be reduced to acceptable levels,</u> to ensure the safety and wellbeing of people, and the protection of buildings, infrastructure and assets.	4.3.4
56.	57	Amend the 4 th paragraph under direction 2.1 (page 57) as follows: There are also some areas subject to natural hazards, but where these risks can be <u>more easily</u> mitigated by building differently, such as increasing the floor levels of a building or ensuring building foundations meet a higher standard. These areas, <u>which include parts of the Port Hills and large areas of the floodplains,</u> are categorised as having negotiable <u>moderate</u> constraints (see Map 8).	4.3.4 & 4.3.9
57.	57	Add a new bullet point after the first bullet point to direction 2.2 (page 57) as follows: Key ways to build resilience to climate change and natural hazards in Greater Christchurch include: <ul style="list-style-type: none"> • Reducing transport... • <u>Recognising interdependencies in the infrastructure sector, especially between telecommunications and electricity, and acknowledging the role they play in responding to, and recovering from, natural hazard events.</u> 	4.3.7
58.	57	Add to the second bullet point in direction 2.2 on page 57 as follows: <ul style="list-style-type: none"> • Focusing growth away from areas likely to be more exposed to natural hazards that will be exacerbated by climate change, such as flooding and coastal erosion, <u>while acknowledging that strategic infrastructure sometimes needs to operate in areas affected by natural hazards.</u> 	4.3.7
59.	58	Amend the tsunami layer underlying Map 7 on page 58 as follows: Remove the red tsunami evacuation map layer and replace with the tsunami inundation 3m wave map layer (~1: 100-200 from 2019/2020 GNS modelling) and amend the legend on the map to refer to Tsunami Inundation – High.	4.3.10
60.	58-59	Remove all references to 'PC12' in the legend to Map 7 and Map 8 and replace with a footnote reference to:	4.3.2

		<i>Jacobs (2021). Risk Based Coastal Hazard Analysis for Land-use Planning; Report for Christchurch City Council, September 2021.</i>	
61.	58-59	Add a reference in the legend to Map 7 and Map 8 as follows: <i>Jacobs (2020). Phase 2 Coastal Inundation Modelling Final Study Report; Report for Waimakariri District Council, March 2020.</i>	4.3.2
62.	58-59	Amend the reference on Map 7 and Map 8 on page 58 and 59 respectively as follows: This map is based on the existing technical information and Geographic Information Systems (GIS) data from the four partner Councils. For some constraints, mapping data is unavailable, incomplete or reliant on emerging policy with legal effect. See ‘Areas to Protect and Avoid Background Report’ for limitations and further information which is available on the Greater Christchurch Partnership website.	4.3.2
63.	59	Amend the title of Map 8 to be consistent with the recommended text changes as follows: Map 8: Areas subject to negotiable moderate natural hazard risks	4.3.4
64.	59	Amend the tsunami layer in Map 8 on page 59 as follows: Remove the orange tsunami evacuation layer and replace with tsunami inundation 5m wave map layer (~1:800 from 2019/2020 GNS modelling) and amend the legend on the map to refer to Tsunami Inundation – Moderate-Low.	4.3.10
65.	60	Amend first paragraph as follows: Protecting strategic infrastructure: Urban development should be avoided carefully managed around strategic infrastructure, to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttleton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the National Grid and the electricity transmission and distribution network (see Map 9).	4.10.1
66.	60	Add text under the heading ‘Protecting strategic infrastructure’ as follows: <u>The noise contours relating to Christchurch International Airport as shown on Map 9 represent the contours operative in the Canterbury Regional Policy Statement 2013. As part of the review of the Canterbury Regional Policy Statement, an update of the airport noise contours was completed by Christchurch International Airport Limited and independently peer reviewed by a panel of experts appointed by the Regional Council. In June 2023 a final set of remodelled air noise contours was made publicly available in a report published by Christchurch International Airport Limited. The updated noise contours will be a key input to the review of the Regional Policy Statement, and</u>	4.10.2

		<u>this is the process by which changes to the spatial extent of the operative contours and the associated policy framework will be considered.</u>	
67.	60	Amend the title of Map 9 to ' Key strategic infrastructure'.	4.10.1
68.	60	Amend Map 9 to: <ul style="list-style-type: none"> • Correctly show the National Grid • Differentiate between the National Grid assets and electricity distribution network assets • Show locations of Prisons • Show the location of the Lyttelton Port Company City Depot inland port • Show location of military bases • Remove Woodford Glen Speedway and Ruapuna Raceway 	4.10.1
69.	60	Move Map 9 and the associated text to sit immediately after Map 5 (page 52), before Opportunity 1 (page 53), to improve the logic flow of the document.	4.10.1
70.	61	Amend Direction 3.1 as follows: 3.1 Avoid development in Protect areas with significant natural values	4.4.1
71.	62	Amend Map 10 to show the sea / coastal water, in blue.	4.4.2
72.	63	Amend Direction 3.1 as follows: 3.1 Avoid development in Protect areas with significant natural values Te ao Māori acknowledges the interconnectedness of people and te taiao – the environment. Based on this Māori world view, kaitiakitanga is a way of managing the environment that recognises that people are an integral part of the natural world, not separate from it; and that there is an intergenerational duty to protect , restore and enhance the mauri (life force) of water, land and ecosystems.	4.4.1
73.	63	Amend text under Direction 3.2 as follows: <i>Direction 3.2 Prioritise the health and wellbeing of water bodies</i> Water is a taonga that is culturally significant to Māori and essential to the wellbeing of all communities. Greater Christchurch has an integrated network of rivers, streams, springs, groundwater and aquifers, linked to estuaries and wetlands in the coastal environment. Restoring the health and wellbeing of water bodies, including wetlands , is a priority for the city region.	4.4.3
74.	64	Add new paragraph 4 under Direction 3.3 to recognise the importance of promoting accessible greenspaces as follows: <u>It is important that green spaces within our urban environments can be enjoyed by people of all ages and abilities, including through inclusive design and the application of universal design standards.</u>	4.4.3
75.	64	Amend text in the last paragraph under Direction 3.3 as follows:	4.4.3

		Improving the quality of the environment <u>in existing and proposed</u> higher density areas is critical. ...	
76.	64	Amend Map 12 title as follows: Map 12: Highly productive soils Land Use Capability Class 1-3 soils	4.44
77.	65	Add new paragraph 4 under Direction 3.4 as follows: <u>Map 12 is not determinative of the identification of highly productive land for inclusion, by way of maps, in the Canterbury Regional Policy Statement as required by the National Policy Statement for Highly Productive Land.</u>	4.4.4
78.	65	Amend paragraph 2 under Direction 3.5 as follows: The concept of a green belt in Greater Christchurch needs to be explored in more detail, and this will be undertaken as part of the development of a blue-green network strategy.	4.4.5
79.	67	Amend Opportunity 4 as follows: Enable diverse, quality and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs.	4.5.2
80.	67	Amend Direction 4.2 as follows: Ensure at least sufficient development capacity is provided or planned for to meet demand	4.5.2
81.	67	Amend Direction 4.5 as follows: Deliver thriving neighbourhoods with quality developments, quality housing and supporting community infrastructure.	4.5.2
82.	69	Amend Direction 4.2 as follows: Ensure at least sufficient development capacity is provided or planned for to meet demand	4.5.2
83.	69	Amend page 69 of the draft Spatial Plan as follows: Further to this, broad locations for residential development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth. <u>Identifying broad locations for residential development, should be guided by the Spatial Strategy, including the six opportunities, directions and the overarching directions that shape the desired pattern of growth. Broad locations at a minimum:</u> <ol style="list-style-type: none"> 1. <u>Adjoins to or are within a Significant Urban Centre, Major Town or a Locally Important Urban Centre in Greater Christchurch</u> 2. <u>Are accessible to either MRT, Core Public Transport Routes or New / Enhanced Public Transport Routes</u> 3. <u>Protect, restore and enhance the natural environment, historic heritage and sites and areas of significance to Māori</u> 4. <u>Are free from significant risks arising from natural hazards and the effects of climate change</u> 	4.5.3
84.	70	Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by inserting the following (page 70):	4.12.3

		...more at incentivisation, partnerships and investment. <u>A broad range of statutory and non-statutory tools will be relied upon for improving the feasibility of intensification to support the desired pattern of growth.</u>	
85.	70	Amend the text on page 70 as follows: ...However, to do this across a spectrum of housing choice and demand, the intensification focus needs to be combined with continuing to provide for <u>diverse forms of housing and</u> some greenfield areas in appropriate locations.	4.5.6
86.	72	Amend page 72 as follows: Housing need in Greater Christchurch, <u>including social and affordable housing,</u> will be further addressed through the development of a joint social and affordable housing action plan.	4.5.6
87.	72	Insert new section after ‘Greenfield’ (page 72) titled ‘Specific Forms and Alternative Approaches to Housing’ with the same or similar wording as follows: <u>Specific Forms and Alternative Approaches to Housing</u> <u>Specific forms of housing and alternative approaches to housing are part of housing choice. They can provide for a range of preferred lifestyle options, respond to deficiencies or particular demand in the housing market, target those with the greatest housing need or deliver housing through innovative and novel approaches. They span the housing continuum from social housing though to private housing in the open market. They can offer greater diversity of housing typologies, tenures and price points.</u> <u>Consideration of how specific forms of housing and alternative approaches to delivering housing can support greater housing choice in Greater Christchurch will be further addressed through the development of a joint housing action plan.</u>	4.5.6
88.	73	Amend Direction 4.5 as follows: Deliver thriving neighbourhoods with quality developments, <u>quality housing</u> and supporting community infrastructure.	4.5.2
89.	73	Amend the description of a thriving neighbourhood (page 73) as follows: They are neighbourhoods that <u>are well connected;</u> enable safe and equitable access for all; have high quality and safe open spaces, green spaces and public realm; and provide <u>a diverse range of housing</u> choice <u>including</u> for social and affordable housing.	4.5.5
90.	73	Amend the section titled ‘vibrant communities with access to services’ (page 73) to <u>Features of Thriving Neighbourhoods.</u>	4.5.5
91.	73	Amend the title of Figure 12 (page 73) from Features of connected neighbourhoods to <u>Features of Thriving Neighbourhoods.</u>	4.5.5
92.	74	Insert a new section after ‘Community facilities and open, green and public spaces’ titled ‘Quality Developments and Quality Housing’ (page 74) with the same or similar wording as follows:	4.5.5

		<p><u>Quality Developments and Quality Housing</u></p> <p><u>Quality developments and quality housing are at the heart of thriving neighbourhoods, enriching the lives and wellbeing of our communities. Quality developments support neighbourhoods to develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</u></p> <p><u>Quality housing meets the diverse needs of the community over their lifetime and ensures that individuals, whānau and communities can live well so our neighbourhoods thrive for all. The Joint Housing Action Plan will consider quality housing in the context of Greater Christchurch.</u></p>	
93.	74	Amend the second instance of the title ‘Community facilities and open, green and public spaces’ (page 74) to ‘Sense of Connection and Safety’	4.5.5
94.	74	Amend the first paragraph on page 74 as follows: Community facilities contribute to strong, healthy and vibrant communities by providing spaces where residents can connect, socialise, learn and participate in a wide range of social, cultural, <u>religious</u> , art and recreational activities.	
95.	75	Amend second bullet point under context as follows: Hubs of tertiary and research institutions are found in Christchurch’s Central City, including the Ara Institute of Canterbury, the tertiary teaching hospital and the health precinct; and at the University of Canterbury campus in Riccarton, and the Lincoln University and <u>various research campuses and farms in and near</u> Lincoln.	4.6.2
96.	75	Insert additional paragraph above the context box as follows: <u>Greater Christchurch contains a number and range of tertiary and research institutions of strategic importance from a local and national perspective. Their retention, protection and continued operation is of regional and national economic importance.</u>	4.6.2
97.	75	Amend Direction 5.1 as follows: <u>At least</u> sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.	4.8.5
98.	75	Amend Direction 5.3 as follows: Direction 5.3 Provision of strategic infrastructure that is resilient, efficient, <u>integrated</u> and meets the needs of a modern society and economy.	4.10.1
99.	75	Insert new direction 5.4 as follows: <u>5.4 Urban growth occurs in locations that do not compromise the ability of primary production activities to expand or change, including adapting to a lower emissions economy.</u>	4.6.2
100.	75	Insert a new direction 5.5 as follows:	4.6.2

		<u>5.5 Urban Growth occurs in locations and patterns that protects strategic regionally and nationally important tertiary institutes.</u>	
101.	76	Amend Map 13 to show the LPC City Depot inland port.	4.6.1
102.	77	Amend Direction 5.1 as follows: <u>At least</u> sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.	4.8.5
103.	79	Add a notation to Map 14 as follows: <u>Ecological enhancement / green belt - The dashed lines are an approximate representation of the location of ecological enhancement / green belt areas, to be further investigated.</u>	4.4.5
104.	79	Amend Map 14 to align with new / expanded business (industrial and commercial) areas that were rezoned by the partially operative Selwyn District Plan.	4.8.6
105.	79	Amend Map 14 to include any existing LLRZ in Greater Christchurch as part of the existing urban area.	4.5.1
106.	79	Amend Map 14 to correctly show the Ōpāwaho Heathcote River.	4.1.2
107.	79	Amend legend item of Map 14 'Growth around central city, centres and corridors' to correspond to the symbology on the maps.	4.12.3
108.	79	Amend Map 14 to reflect resultant changes and the status of private plan changes, district plan reviews, IPIs and referred projects under the COVID-19 Recovery (Fast-track Consenting) Act 2020.	4.12.3
109.	79	Identify Prebbleton on Map 14 as a 'Locally important urban centres and town'.	4.1.6
110.	80	Amend Direction 5.3 as follows: Direction 5.3 Provision of strategic infrastructure that is resilient, efficient, <u>integrated</u> and meets the needs of a modern society and economy.	4.10.1
111.	80	Amend fourth bullet point under Direction 5.3 to revised Opportunity 6 wording: Prioritise sustainable <u>and accessible</u> transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.	4.7.5
112.	81	Amend the 5th bullet point under 'Current and planned state of strategic infrastructure networks' on page 81 as follows: Growth in the use of electricity for transport will necessitate greater provision of electric charging networks in Greater Christchurch. This is expected to be provided by the private sector. Over time, there may be a requirement for greater local generation of green energy. <u>The provision of reliable renewable energy will be important for achieving a low carbon future for Greater Christchurch.</u>	4.3.5
113.	81	Add a new bullet point with the following text after the second to last bullet point on page 81 as follows:	4.3.6

		<p><u>The National Grid will continue to play an important role in electrification of the economy and will need to be protected. Long-term planning for the maintenance, operation, upgrading and development of the National Grid needs to be facilitated and supported. While existing National Grid assets are identified on the Spatial Plan maps, new development will necessitate new assets, particularly to connect to new generation.</u></p>	
114.	81	<p>Insert a new direction 5.4 and explanation as follows:</p> <p><u>5.4 Urban growth occurs in locations that do not compromise the ability of primary production activities to expand or change, including adapting to a lower emissions economy.</u></p> <p>[Explanation:]</p> <p><u>Greater Christchurch is a business and research hub for primary production across Canterbury and the South Island. Primary production is one of the key drivers of our economy and employment. A strong agricultural economy supports growth and development in the rest of the economy due to its linkages with research, manufacturing and transport. Quarries also play an important role in urban growth and development. Consideration needs to be given to their location, operation, and function, to ensure a reliable and affordable future supply of aggregates and that adverse impacts on communities and the environment, including potential effects on groundwater and drinking water sources, can be appropriately managed. This includes the rehabilitation of quarry sites once extraction ceases.</u></p> <p><u>Primary production activities are located within Greater Christchurch, and urban growth can impact these land uses and rural communities. Some of these effects can be positive, bringing new people and amenities to rural areas. However, there are also adverse effects of urban growth which need to be managed.</u></p> <p><u>There is need for primary production activities to be able to expand or change in response to new markets and new issues, including transforming to a lower emissions economy. A growing primary production industry creates opportunities for other industries to prosper.</u></p>	4.6.2
115.	81	<p>Insert a new direction 5.5 and explanation as follows:</p> <p><u>5.5 Urban Growth occurs in locations and patterns that protects strategic regionally and nationally important tertiary institutes.</u></p> <p>[Explanation:]</p> <p><u>Greater Christchurch has significant tertiary education and research capability. This includes four tertiary institutes and several research institutes, including six of the seven Crown Research Institutes in Aotearoa New Zealand.</u></p> <p><u>There are more than 25,000 tertiary students across the four tertiary campuses in Greater Christchurch. The majority of these institutions are located outside of the significant urban centres of Greater Christchurch, and may be impacted by urban growth. Improved public</u></p>	4.6.2

		<p><u>transport links to campuses will enhance integration with Greater Christchurch.</u></p> <p><u>Tertiary and research institutes need to be provided for and protected as these institutions are providing the skilled workers of the future as well as key drivers creating and adopting innovations, and providing more sustainable ways for our communities and businesses to operate.</u></p>	
116.	83	<p>Amend Opportunity 6 as follows:</p> <p>Prioritise sustainable <u>and accessible</u> transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.</p>	4.7.5
117.	84	<p>Amend Map 15 to include key freight routes as outlined in the image below (from Lyttelton Port Company Limited submission):</p> 	4.7.6
118.	84	Amend Map 15 to add Port notations to map legend.	4.10.1
119.	84	<p>Amend Map 15 to show three strategic cycleways in Selwyn District</p> <ul style="list-style-type: none"> • Lincoln to Rolleston cycleway • Rolleston to West Melton cycleway • Springston and Lincoln cycle path 	4.7.5
120.	89	<p>Amend the Joint Work Programme section of the draft Spatial Plan to satisfy the requirements of clause 3.16 of the NPS-UD on the regularity of the review of the FDS. The new wording should be as follows:</p> <p>The plan will be reviewed and updated (as needed) every five years. <u>The Future Development Strategy component of the plan will be reviewed and updated (as needed) every three years.</u></p>	4.12.3
121.	90	Amend the purpose of the Joint Housing Action Plan on page 90 as follows:	4.5.5

		To create a housing action plan that ensures the entire housing continuum is working effectively to provide quality , affordable housing choice and diversity.	
122.	90	Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by amending the purpose of the statutory tools action/initiative (page 90) as follows: To assess, propose and implement the suite of statutory tools that will give effect to the Spatial Plan, improve the feasibility of intensification , and enable delivery of the joint work programme.	4.12.3
123.	90	Formalise exploring improving the feasibility of intensification as a response to the insufficiency of development capacity by amending the purpose of the non-statutory tools action/initiative (page 90) as follows: To assess, propose and implement the suite of non-statutory tools that will give effect to the Spatial Plan, improve the feasibility of intensification , and enable delivery of the joint work programme.	4.12.3
124.	92	Insert the following sentence: The progress made on the work programme will be reported bi-annually to the Whakawhanake Kāinga Komiti. The partnership must also undertake monitoring as required by the National Policy Statement on Urban Development which will inform future development capacity assessments.	4.8.7
125.	92	Amend the Joint Work Programme section of the draft Spatial Plan to satisfy the requirements of clause 3.16 of the NPS-UD on the regularity of the review of the FDS. The new wording should be as follows: This will ensure that future iterations of the plan can respond to changing demographic, social, economic and cultural factors. The Future Development Strategy component of the plan will be reviewed every three years following the preparation of the latest Housing and Business Development Capacity Assessment.	4.12.3

Appendix 4 – Mark Up of the draft Spatial Plan with recommended changes.

Note: This appendix is provided as separate links on the GCP website:

<https://greaterchristchurch.org.nz/urbangrowthprogramme/draft-greater-christchurch-spatial-plan/>

Appendix 5 – Experience and Qualifications

Ben Rhodes

My full name is Benjamin James Rhodes. I hold the position of Planning Manager – South Island and Wellington at Harrison Grierson Consultants. I have been employed by Harrison Grierson for 16 months, prior to that I worked at Selwyn District Council for 15 years in various planning roles.

I hold the following qualifications: Bachelor of Resource Studies from Lincoln University. I am a Full Member of the New Zealand Planning Institute.

I have 18 years' experience as a resource management planner, working for local authorities and a multi-disciplinary consultancy. At Selwyn District Council I held a number of planning roles from 2007 to mid-2022, with the last position being Planning Manager. During this time, I processed resource consents, provided policy analysis, helped prepare structure plans, growth strategies, and processed private plan change requests and was involved in the DPR process at varying levels until mid-2022.

George Sariak

My full name is George Daniel Sariak. I hold the position of Senior Strategy Planner at Selwyn District Council. I have been employed by Selwyn District Council since February 2021.

I hold the following qualifications: Master of Science Spatial Planning with Sustainable Urban Design from the University of Dundee (2019) which is accredited by the Royal Town Planning Institute and Bachelor of Arts International Relations from Swansea University (2016). I am an associate of the New Zealand Planning Institute.

I have over 4 years' experience working in planning, resource management and policy both in New Zealand and the United Kingdom. I have held positions in local government, consultancies and in the renewable energy development sector. My most recent experience includes preparing and processing resource consent applications, statutory planning and policy preparation, policy analysis, submission writing and spatial planning processes.

Janice Carter

My full name is Janice Carter. I hold the position of Senior Associate at Barker and Associates, a position I have held since September 2019. I have been engaged by the Christchurch City Council to fulfil the position of its Council Officer for the GCSP.

I hold the qualifications of Bachelor of Science in Geology and Geography from the University of Canterbury and a Master of Science (Hons) (Resource Management) from the University of Canterbury and Lincoln College. I am a full member of the New Zealand Planning Institute.

I have been employed in planning roles in private consultancies and local government for approximately 30 years. My experience includes providing planning advice to central and local government and private developers. A large proportion of my work has involved regional and district plan drafting and policy analysis and preparing resource consent applications for a variety of developments. I also undertake work as an independent planning commissioner.

Rachel McClung

My full name is Rachel Sarah McClung. I have been employed by the Waimakariri District Council since June 2022 as a Principal Policy Planner within the Development Planning Unit Team.

I hold the qualifications of Bachelor of Science from Canterbury University (2000) and a Master of Science (Hons) (Resource Management) from Lincoln University (2002). I am a full member of the New Zealand Planning Institute (2010).

I have 21 years post-graduate experience working as a resource management planner and policy advisor in various positions for local government, a non-government organisation and consultancies, in both New Zealand and the United Kingdom. My work experience includes, amongst other tasks, policy research and reporting for plan changes to district plans, for both councils and private clients.

Tammy Phillips

My full name is Tamara (Tammy) Jane Phillips. I am a Senior Strategy Advisor at the Canterbury Regional Council, a position I have held since August 2022. Between November 2017 and August 2022, I was employed by the Regional Council as a Principal Planner.

I hold a Master's degree in Regional and Resource Planning from Otago University. I am an Intermediate member of the New Zealand Planning Institute.

I have over 17 years' experience in planning and strategy. My relevant experience includes drafting plan provisions, section 32 report writing, and preparing submissions on plan changes. Prior to joining the Regional Council, I worked as a local government planner in London. I was involved in the development of strategic planning policy and worked on a range of urban planning issues.