

# **OUR SPACE 2018-2048**

## **GREATER CHRISTCHURCH SETTLEMENT PATTERN**

### *Whakahāngai O Te Hōrapa Nohoanga*

**A strategy prepared under the Local Government Act 2002 to give effect to the requirements of the National Policy Statement on Urban Development Capacity 2016**

**Report and Recommendations of the Hearing Panel incorporating Addendum dated 5 June 2019**

#### **Hearing Panel:**

**Bill Wasley (Chair)**

**Gail Gordon**

**Councillor Sara Templeton**

**Deputy Mayor Malcolm Lyall**

**Councillor Peter Skelton**

**Councillor Neville Atkinson**

**Jim Harland**

[this page is intentionally blank]

Executive Summary .....	5
INTRODUCTION .....	6
WHAT IS OUR SPACE? .....	7
LEGAL FRAMEWORK.....	10
PREPARATION OF OUR SPACE – BACKGROUND AND CONTEXT .....	14
CONSULTATION AND THE HEARING PROCESS .....	16
RECOMMENDATION AND REASONS.....	17
Role and scope of Our Space considering the requirements of the NPS-UDC .....	18
Accuracy and uncertainties of projected future demand .....	19
Appropriateness of methodology for determining commercial and industrial land capacity .....	21
Requests for additional land to be included for future commercial and industrial development.....	23
Land in close proximity to freight hubs .....	24
Port of Lyttelton.....	25
Focusing commercial activity in key centres and the 10-Minute neighbourhood and 8-80 concept.....	25
Sufficient feasible development capacity for housing.....	27
Feasibility analysis.....	30
Geotechnical constraints.....	33
Management of densities in greenfield priority and future development areas .....	36
Monitoring and review and how this relates to feasibility and uptake .....	39
Housing choices - Location and type of housing.....	40
Provision of social and affordable housing (Social and affordable housing action plan)...	42
Identification of broad location, timing and sequencing of development.....	43
Requests for additional land to be included for future residential development.....	46
Rural residential and large lot development.....	48
Provision and protection of key infrastructure and integration with development .....	49
Management of natural hazards .....	50
Signalling matters needing to be addressed prior to full Canterbury Regional Policy Statement review.....	52
Addressing climate change and achieving sustainability and zero carbon goals.....	52
CONCLUSION AND RECOMMENDATIONS .....	53
APPENDICES.....	57

[this page is intentionally blank]

## Executive Summary

- [1] This is a recommendations report on *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (Whakahāngai O Te Hōrapa Nohoanga)*. The 'Strategy', or 'Our Space' is a strategy prepared under the Local Government Act 2002 (**LGA**). The Strategy has been prepared by the local authorities of Greater Christchurch in conjunction with the Greater Christchurch Partnership.
- [2] The purpose of Our Space is to fulfil the requirements of the National Policy Statement on Urban Development Capacity (**NPS-UDC**) by developing a future development strategy for Greater Christchurch in accordance with Policies PC12-14 of the NPS-UDC. Our Space builds on, and is in addition to, the existing Urban Development Strategy for Greater Christchurch 2007 and the 2016 update (**UDS**).
- [3] The settlement pattern and actions identified in Our Space provide sufficient, feasible capacity for the *minimum area* required to provide for short (0-3 years), medium (0-10 years) and long term (10-30 years) projections for growth.
- [4] The key findings on the evidence presented to us are:
- a. The methodology for undertaking the capacity assessment to determine sufficient, feasible capacity for housing and business is adequate for the present purpose. Future changes to the methodology (including a common agreed methodology between local authorities) can be undertaken for future capacity assessments.
  - b. Monitoring, future capacity assessments, and analysis of population projections provide for a responsive planning framework.
  - c. A targeted change to the Canterbury Regional Policy Statement to be promulgated in 2019 will be limited to those areas identified in Our Space for future residential development. This will enable Selwyn and Waimakariri District Councils to provide for short to medium term capacity in their district plans.
  - d. No additional development areas are proposed to be added to those identified in the areas notified. The merits of any further additional areas will be considered as part of the full review of the Canterbury Regional Policy Statement. This will include consideration of the vision and principles of the UDS.

- e. New development in Selwyn and Waimakariri Districts is expected to achieve a minimum net density of 12 households per hectare. Further work on minimum densities will be undertaken as part of the full review of the Canterbury Regional Policy Statement.
- f. Further emphasis is required to recognise sustainability in Our Space, including recognition of the effects of climate change and sea-level rise, and the contribution of a compact urban form to transport efficiency and public transport.

[5] We are satisfied that Our Space appropriately implements the provisions of the NPS-UDC.

## INTRODUCTION

[6] The Greater Christchurch Partnership has produced a draft Our Space for consultation under Part 6 of the LGA.

[7] As part of this consultation, the Greater Christchurch Partnership Committee established a Future Development Strategy Hearings Panel Subcommittee (the **Hearings Panel**) comprising the following representatives:

- a. Bill Wasley, Greater Christchurch Partnership Committee Independent Chair (Chair)
- b. Councillor Peter Skelton, Canterbury Regional Council
- c. Councillor Sara Templeton, Christchurch City Council
- d. Deputy Mayor Malcolm Lyall, Selwyn District Council
- e. Councillor Neville Atkinson, Waimakariri District Council
- f. Gail Gordon, Te Rūnanga o Ngāi Tahu
- g. Tā Mark Solomon, Canterbury District Health Board<sup>1</sup>
- h. Jim Harland, New Zealand Transport Agency (non-voting representative)

[8] In accordance with our Terms of Reference, our role is to consider the content of all submissions, allowing an opportunity for submitters wishing to be heard to present

submission points to us and receive an Officers' Report in response to the matters raised through submissions. Following the consideration of submissions, hearing from submitters and receiving of an Officers' Report, our role is to hold deliberations and make recommendations to the Greater Christchurch Partnership Committee on any changes considered necessary to the draft Our Space document.

- [9] This is the recommendations report of the Hearings Panel on changes considered necessary to Our Space.

## WHAT IS OUR SPACE?

- [10] Our Space is a non-statutory document prepared under Part 6 of the LGA to meet the requirements of the NPS-UDC for local authorities in high growth areas to produce a future development strategy.

- [11] A future development strategy is required to demonstrate that there will be sufficient, feasible development capacity in the medium and long term and set out how the minimum targets for sufficient, feasible development capacity for housing will be met.<sup>2</sup> It is informed by the Housing and Business Development Capacity Assessment (**Capacity Assessment**), and the relevant Long Term Plans and Infrastructure Strategies required under the LGA.<sup>3</sup> It shall identify future urban environments and intensification opportunities and balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development.<sup>4</sup> Local authorities are encouraged to amend, refresh and build on existing strategies to meet the NPS-UDC requirements rather than developing an entirely new strategy.<sup>5</sup>

- [12] The Greater Christchurch Partnership (previously the Greater Christchurch Urban Development Strategy Committee) has worked collaboratively over more than a decade on planning and managing urban growth and development in Greater

---

<sup>1</sup> Tā Mark Solomon was appointed to hear submissions on behalf of the Christchurch District Health Board but was unable to attend and was excused. He did not take part in the Hearings Panel's deliberations.

<sup>2</sup> NPS-UDC, Policy PC12.

<sup>3</sup> NPS-UDC, Policies PC13 and PC14. Local authorities are also required to have particular regard to Policy PA1 of the NPS-UDC.

<sup>4</sup> NPS-UDC, Policies PC13 and PC14.

<sup>5</sup> Ministry for the Environment. 2017. *National Policy Statement on Urban Development Capacity: Responsive Planning – Guide on producing a Future Development Strategy*. Wellington: Ministry for the Environment at page 10.

Christchurch to support the long term needs of people and communities, including through the development of the UDS and subsequent updates. Given the work that has already been done, the Partnership has been able to address the requirements of the NPS-UDC in the context of a review of the strategic land use framework provided by the UDS (**Settlement Pattern Review Update**).

[13] The Settlement Pattern Review Update has focussed on the key strategic planning directions that need to be undertaken collaboratively through the Greater Christchurch Partnership to address the land use and infrastructure issues identified in the Capacity Assessment. It recognises that providing development capacity is not just about land supply and therefore also considers other more detailed planning and policy actions that will need to be implemented to realise the broader growth aspirations for Greater Christchurch.

[14] In summary, Our Space:

- a. Focuses on how urban areas accommodate growth and how efficient infrastructure planning can support and guide development decisions;
- b. Builds on existing plans that show that Greater Christchurch is already well-placed for future development over the next 30 years;
- c. Balances the projected future demands of housing and business markets with the urban form that will best enable sustainable growth whilst acknowledging the effects that the Canterbury earthquakes have had on the demand for, and distribution of, housing and businesses in Greater Christchurch; and
- d. Recognises that how we live today will be quite different 30 years from now, so we need to be responsive to change.

[15] Specifically, Our Space:

- a. Sets out how Greater Christchurch and territorial authority targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
- b. Identifies locations for housing growth through to 2048, encouraging central city and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;

- c. Reinforces the role of key centres in providing additional retail and office floorspace, in particular the central city and the potential for surrounding industrial zones to transition to commercial uses over time, if needed;
- d. Recognises the existing industrial land provision as sufficient to cater for anticipated industrial growth; and
- e. Outlines a series of implementation actions and further work required by partners, recognising that although the long term is addressed in Our Space, additional work is required to ensure that planning directions for the longer term are appropriately investigated and implemented, and effectively respond to emerging drivers of change for Greater Christchurch.

[16] The Strategy is set out in six parts which can be summarised as follows:

- a. The place and context of Greater Christchurch and explanation of the NPS-UDC
- b. Business and residential growth needs for Greater Christchurch
- c. The key challenges facing Greater Christchurch when providing for growth
- d. The plan for growth, including locations, how sequencing is to be provided for, and transport and infrastructure
- e. Future actions and monitoring

[17] The Strategy is part of a policy cycle of ongoing monitoring and a frequently updated evidence base. The NPS-UDC requires local authorities to carry out a housing and business development capacity assessment on a three-yearly basis and monitor a range of indicators on a quarterly basis. When this evidence or monitoring indicates that development capacity is not sufficient in any of the short, medium or long term, local authorities are required to respond by providing further development capacity and enabling development. We set out below the legal framework for the Strategy and its development under the NPS-UDC.

[18] As indicated in the Ministry for the Environment Guidance material, as a future development strategy, Our Space will guide and inform future planning and decision-making about future urban growth, potential constraints to urban growth and

opportunities and solutions to respond to growth over the next 30 years.<sup>6</sup> Our Space will be a relevant strategy for decision-makers to have regard to on any change to, or review of, the Canterbury Regional Policy Statement (**CRPS**) and district plans.

## LEGAL FRAMEWORK

[19] The legal framework for Our Space is summarised in the Officers' Report, and we adopt that as set out below. We have slightly re-ordered these to recognise up front the NPS requirements to prepare a future development strategy.

[20] The NPS-UDC came into effect in 2016. It directs local authorities to provide sufficient development capacity in their resource management plans, supported by infrastructure, to meet demand for housing and business land. This capacity can be provided outwards (on greenfield sites) and/or upwards (by intensifying existing urban environments).

[21] Policies PC12 to PC14 of the NPS-UDC relate to the production of a future development strategy, as set out in the following table. A key requirement of a future development strategy is that it demonstrates there will be sufficient, feasible development capacity for housing and business in the medium and long term. Our Space is the future development strategy for Greater Christchurch.

Policy	Requirement
PC12	Local authorities shall produce a future development strategy which demonstrates that there will be sufficient, feasible development capacity in the medium and long term. This strategy will also set out how the minimum targets set in accordance with policies PC5 and PC9 will be met.
PC13	The future development strategy shall: <ul style="list-style-type: none"> <li>a) identify the broad location, timing and sequencing of future development capacity over the long term in future urban environments and intensification opportunities within existing urban environments;</li> <li>b) balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development; and</li> <li>c) be informed by the relevant Long Term Plans and Infrastructure Strategies required under the Local Government Act 2002, and any other relevant strategies, plans and documents.</li> </ul>
PC14	The future development strategy can be incorporated into a non-statutory document that is not prepared under the Act, including documents and strategies prepared under other legislation. In developing this strategy, local authorities shall:

<sup>6</sup> Ministry for the Environment. 2017. *National Policy Statement on Urban Development Capacity: Responsive Planning - Guide on producing a Future Development Strategy*. Wellington: Ministry for the Environment at page 9.

	<p>a) Undertake a consultation process that complies with:</p> <ul style="list-style-type: none"> <li>o Part 6 of the Local Government Act; or</li> <li>o Schedule 1 of the Act;</li> </ul> <p>b) be informed by the assessment under policy PB1; and</p> <p>c) have particular regard to policy PA1.</p>
--	---

[22] Policy PA1 is a central policy of the NPS-UDC, stating that local authorities shall ensure that at any one time there is sufficient, feasible development capacity, according to the table below, in the short (three years), medium (ten years) and long term (thirty years).

Period	Policy PA1 Requirement
Short Term (0-3 years)	Development capacity must be feasible, zoned and serviced with development infrastructure.
Medium Term (3-10 years)	Development capacity must be feasible, zoned and either: <ul style="list-style-type: none"> <li>▪ serviced with development infrastructure, or</li> <li>▪ the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002.</li> </ul>
Long Term (10-30 years)	Development capacity must be feasible, identified in relevant plans and strategies, and the development infrastructure required to service it must be identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.

[23] We received legal advice from Wynn Williams<sup>7</sup> as part of the Officers' Reply Report on the requirements of the NPS-UDC for assessing sufficiency and feasibility. Development capacity, sufficient, feasible and demand are all separately defined in the NPS-UDC.

[24] Policies PA2, PA3 and PA4 also direct local authority decision making. These policies recognise the importance of infrastructure to support urban development and that in providing development capacity, local authorities need to provide for the wellbeing of people, communities and future generations, but not without considering the effects of development.

---

<sup>7</sup> Memorandum from Wynn Williams, Legal advice to accompany any Officers' Response to Panel questions in relation to sufficiency and feasibility dated 8 March 2019.

Policy	Requirement
PA2	Local authorities shall satisfy themselves that other infrastructure required to support urban development are likely to be available.
PA3	When making planning decisions that affect the way and the rate at which development capacity is provided, decision-makers shall provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, whilst having particular regard to: <ul style="list-style-type: none"> <li>a) providing for choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses;</li> <li>b) promoting the efficient use of urban land and development infrastructure and other infrastructure; and</li> <li>c) limiting as much as possible adverse impacts on the competitive operation of land and development markets.</li> </ul>
PA4	When considering the effects of urban development, decision-makers shall take into account: <ul style="list-style-type: none"> <li>a) the benefits that urban development will provide with respect to the ability for people and communities and future generations to provide for their social, economic, cultural and environmental wellbeing; and</li> <li>b) the benefits and costs of urban development at a national, inter-regional, regional and district scale, as well as the local effects.</li> </ul>

[25] Policies PA3 and PA4 impose obligations on a decision-maker, which is defined in the NPS-UDC as any person exercising functions and powers under the Resource Management Act 1991 (**RMA**).

[26] While the objectives and high level policies of the NPS-UDC apply to all local authorities, some policies apply only to local authorities that have part, or all, of either a medium growth urban area or high growth urban area within their district or region.

[27] In 2016, the Christchurch urban area (which includes the towns of Prebbleton in the Selwyn District and Kaiapoi in the Waimakariri District) was defined by Statistics NZ as a high growth urban area.

[28] Given the strategic planning arrangements that already exist between Greater Christchurch councils through the Greater Christchurch Partnership, it was agreed that the urban area covered by the UDS would be the more appropriate geographic focus for the purposes of meeting the NPS-UDC requirements. This area is defined in Map A of Chapter 6 of the CRPS.

[29] The key additional NPS-UDC requirements for local authorities with high growth urban areas are:

- a. commence quarterly monitoring of market indicators (PB6)

- b. complete a housing and business development capacity assessment (PB1 to PB5)
- c. produce a future development strategy (PC12 to PC14)
- d. set minimum housing targets in regional policy statements and district plans (PC5 to PC11).

[30] Recognising the importance of coordinated planning and decision making, policies PD1 and PD3 strongly encourage local authorities that share jurisdiction over an urban area to collaborate and cooperate to reach agreement on the content of a capacity assessment, the specification of the minimum targets and the production of a joint future development strategy.

[31] Policies PB1 to PB7 of the NPS-UDC relate to the preparation of a comprehensive evidence base to support planning decisions. Key requirements of these policies include monitoring market indicators and completing a housing and business development capacity assessment (**Capacity Assessment**). The Greater Christchurch Partnership has met these two requirements, with links to the relevant outputs provided in the following table.<sup>8</sup>

NPS-UDC Output	Link
Urban Development Indicators - Quarterly Monitoring Reports	<a href="http://greaterchristchurch.org.nz/ourspace/urban-development-indicators/">http://greaterchristchurch.org.nz/ourspace/urban-development-indicators/</a>
Summary Housing and Business Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Housing-and-Business-Development-Capacity-Assessment-Summary.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Housing-and-Business-Development-Capacity-Assessment-Summary.pdf</a>
Technical Housing Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Greater-Christchurch-Housing-Capacity-Assessment-reports-1-4.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Greater-Christchurch-Housing-Capacity-Assessment-reports-1-4.pdf</a>
Technical Business Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-5-Business-Development-Capacity.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-5-Business-Development-Capacity.pdf</a>

[32] The NPS-UDC requires high growth area local authorities to prepare a capacity assessment every three years and monitor market indicators on a quarterly basis. This ensures that local authorities have a robust and up-to-date base of information on which to make decisions that impact development capacity and, ultimately, the supply and price of housing and business space. When the evidence base or

---

<sup>8</sup> The Greater Christchurch Partnership's housing and business development capacity assessment has been held in draft form at this stage so that it may be informed by additional information provided through consultation on the draft future development strategy (*Our Space 2018-2048: Greater Christchurch Settlement Pattern Update*).

monitoring indicates that development capacity is not sufficient in any of the short, medium or long term, local authorities shall respond by providing further development capacity and enabling development in accordance with policies PA1, PC1 or PC2, and PC4.

- [33] Policies PC5 to PC11 relate to the setting of minimum targets for sufficient, feasible development capacity for housing. The targets should reflect the overall quantity of demand for housing identified in the capacity assessment and include the additional margins required under policies PC1 or PC2. Minimum targets must be set for the medium and long term, and be reviewed every three years.
- [34] The NPS-UDC directs regional councils to incorporate minimum targets for sufficient, feasible development capacity for housing into their regional policy statements and territorial authorities to incorporate minimum targets, as a proportion of the regional minimum target, into a relevant resource management plan.<sup>9</sup>

## **PREPARATION OF OUR SPACE – BACKGROUND AND CONTEXT**

- [35] When the NPS-UDC was introduced in 2016, the Greater Christchurch Partnership was well placed to respond to the requirement to produce a future development strategy given the work it had undertaken for more than a decade on planning and managing urban growth and development in Greater Christchurch to support the long term needs of people and communities. As set out in the Harrison Grierson Report, a collaborative approach to spatial planning underpinned by a robust-evidence base as required by the NPS-UDC is not a new concept for the Greater Christchurch Partnership.<sup>10</sup>
- [36] The vision, principles and strategic goals of the UDS recognise the importance of leadership, partnership and collaboration and integrating environmental, land use, infrastructure, social, cultural, economic and governance goals, working with the environment, and using the best available information and evidence in decision making, policies, plans and activities.
- [37] The UDS was developed with significant community consultation and set out an approach to managing growth and providing for community wellbeing in Greater Christchurch to 2041. The UDS and the Greater Christchurch Partnership played a

---

<sup>9</sup> NPS-UDC, Policies PC5-PC11.

<sup>10</sup> Harrison Grierson, Review of Draft Future Development Strategy, section 2.2.

crucial role in coordinating and facilitating rebuild and recovery activities after the earthquakes. This included implementation of a land use framework inserted into the CRPS by the Land Use Recovery Plan (**LURP**).

- [38] Prior to the NPS-UDC taking effect in 2016, the Greater Christchurch Partnership had endorsed an update to the UDS to respond to the significant events and changes that had occurred in Greater Christchurch, particularly in relation to the Canterbury earthquakes. This did not attempt to revise the land use framework outlined for Greater Christchurch in the LURP and in Chapter 6 of the CRPS. Instead it contained a priority action relating to a comprehensive review of the UDS.
- [39] Following the NPS-UDC taking effect, the Greater Christchurch Partnership Committee endorsed a review of the UDS to focus on the settlement pattern aspects needed to meet the requirements of the NPS-UDC. The main objective of the Settlement Pattern Review Update was to enable the local authorities across Greater Christchurch to collaboratively review the existing settlement pattern arrangements and ensure they fulfil their statutory obligations under the NPS-UDC.
- [40] A further objective seeks to ensure appropriate alignment with other planning and strategy processes, including:
- a. The District Plan review underway in the Selwyn District
  - b. The District Development Strategy and District Plan review underway in the Waimakariri District
  - c. The Christchurch District Plan
  - d. The Greater Christchurch Transport Statement, Canterbury Regional Land Transport Plan and Canterbury Regional Public Transport Plan
  - e. The development by councils of 2018-2028 Long Term Plans and 30 Year Infrastructure Strategies.
- [41] In May 2018, the Greater Christchurch Partnership Committee endorsed a scoping paper that outlined how a future development strategy for Greater Christchurch would be produced. It stated that it would be guided by the vision, principles and strategic goals of the UDS, and would represent the integrated land use and infrastructure planning response to the findings of the Capacity Assessment.
- [42] It stated the principles that would shape the approach of the future development strategy as being that it:
- a. Helps deliver and aligns with the vision for Greater Christchurch
  - b. Demonstrates a collaborative approach through leadership and partnership

- c. Integrates, supports and builds on existing strategies and initiatives through an efficient, fit-for-purpose and holistic process
- d. Enables a responsive approach that can address any changes to Government policy, changes arising from the drivers and disruptions that may influence urban development, and further long term spatial planning following the adoption of the future development strategy
- e. Achieves the NPS-UDC requirements
- f. Is informed by a robust evidence base and feedback from stakeholder and community engagement.

## CONSULTATION AND THE HEARING PROCESS

[43] The Greater Christchurch Partnership prepared a draft Our Space document for consultation under Part 6 of the LGA. The Officers' Report<sup>11</sup> sets out the comprehensive consultation process undertaken as part of the development strategy. This included formal public consultation from 1 to 30 November 2018, stakeholder mailouts, public notices and press releases, targeted engagement and workshops, presentations and seminars and public drop in sessions.

[44] A total of 92 submissions were received on Our Space. The public hearings occupied 5 days commencing 25 February 2019. The hearings were held at the offices of the Canterbury Regional Council (**CRC** or **Environment Canterbury**), and the Christchurch City Council (**CCC**) in Christchurch City, as well as the Waimakariri District Council (**WDC**) in Rangiora and the Selwyn District Council (**SDC**) in Rolleston. The hearing process enabled submitters who wanted to be heard to present their submissions to us in a public forum. Where we had questions of submitters, we asked these, and also provided opportunities for clarification from the submitters.

[45] As part of our proceedings, we issued three Minutes. The first Minute<sup>12</sup> issued on 8 February 2019 discussed potential for conflicts of interest and disclosure relating to those, with provision for any party to raise issues. No issues were raised by submitters in relation to those matters.

[46] We issued a second Minute<sup>13</sup> on 7 March 2019 outlining matters which we considered relevant to our consideration of the Strategy, and arising from the content

---

<sup>11</sup> At Section 3, pages 9-12.

<sup>12</sup> Minute 1 of the Hearing Panel dated 8 February 2019.

<sup>13</sup> Minute 2 of the Hearing Panel dated 7 March 2019.

of the submissions and evidence presented to us. We provided Officers with the opportunity to respond to those questions, and commenced our deliberations in public on 11 March 2019.

[47] In a third Minute issued on 11 March 2019,<sup>14</sup> we invited the Chief Executives of the Partner Councils to address us in relation to outstanding matters between the Partner Councils, which they did on Wednesday 13 March 2019.

[48] At its meeting on 31 May 2019, the Greater Christchurch Partnership Committee received our Recommendations Report dated 3 May 2019. At the meeting the Committee requested that we provide clarification on our recommendations in relation to four matters. The Hearings Panel met on 31 May and 5 June 2019 to deliberate on these matters. We have addressed the Committee's request as an Addendum to our Recommendations Report and for ease of reference have incorporated our further recommended amendments to Our Space in Appendix 2.

[49] We are grateful for the assistance of both the Officers and submitters in the hearing process for providing thoughtful, informed and useful information to us. We address what we consider to be the key issues raised in submissions later in this report.

[50] We are satisfied that no party has raised with us any procedural matters in relation to the process and hearings that are not addressed in this report.

[51] This report encompasses our recommendations to the Greater Christchurch Partnership Committee on Our Space. **Appendix 1** sets out our recommendations and reasons in response to every submission (whether heard or not) lodged on Our Space. A copy of Our Space 2018-2048 incorporating our recommendations is attached as **Appendix 2**. Copies of the Minutes issued by the Hearings Panel are included as **Appendix 3**. The Addendum to the Report and Recommendations of the Hearings Panel dated 5 June 2019 is attached as **Appendix 4**.

## **RECOMMENDATION AND REASONS**

[52] In the sections below we address the key issues raised in submissions on Our Space. In making our recommendations we have considered all material provided to us and presented during the course of the hearings. In setting out our reasons for our recommendations in this report we have not discussed all individual comments in detail, but have grouped these according to the issues raised. We have in some

cases referred to individual comments made, where doing so assists in explaining our reasoning and recommendations.

- [53] In Appendix 1 to this report we have set out our recommendations in response to each of the individual submissions lodged on Our Space. Again, in setting out our reasons for the recommendations we have not discussed all individual comments in detail.
- [54] The Panel adopts the recommendations in the Officers' Report unless otherwise stated.

***Role and scope of Our Space considering the requirements of the NPS-UDC***

- [55] We asked Officers about the role and scope of Our Space considering the requirements of the NPS-UDC.
- [56] They told us that the principal objective of Our Space is that the councils in Greater Christchurch meet their obligations under policies PC12 to PC14 of the NPS-UDC to produce a future development strategy, and that this is achieved through a collaborative approach guided by the comprehensive strategic planning framework that already exists for Greater Christchurch.
- [57] In this context, they said, Section 1 of Our Space outlines the purpose and scope of the document. This includes "to address the need for housing and business development capacity in Greater Christchurch", and in doing so, that "it will satisfy the requirement of the National Policy Statement on Urban Development Capacity for high growth councils to produce a 'future development strategy'".
- [58] Officers recommended strengthening the wording in Section 1 to make it clear that Our Space has principally been prepared to satisfy the requirements to produce a future development strategy.
- [59] During discussion between the Hearings Panel and Mr Matthew Bonis, a planning consultant and an expert witness for the Lyttelton Port Company (**LPC**), Mr Bonis mentioned that perhaps a good way of bringing clarity to the purpose of the Our Space document, which he considered was lacking, might be to strip back the content of it so that it just responded to the capacity requirements under policies PC12 to PC14 of the NPS-UDC.

---

<sup>14</sup> Minute 3 of the Hearing Panel dated 11 March 2019.

- [60] Officers told us that they acknowledge that there are elements in Our Space that do not directly contribute to meeting the statutory requirements under policies PC12 to PC14 of the NPS-UDC to produce a future development strategy. Such sections mostly cover context and trends, cultural values and aspirations, strategic and policy background, growth challenges, and integrated land use and transport planning.
- [61] They said that while the main objective of Our Space is to ensure that the councils in Greater Christchurch meet their obligations under the NPS-UDC, sections covering wider considerations, beyond those required by the NPS-UDC, are still important for providing the bigger picture for how Our Space proposes to accommodate future housing and business needs across Greater Christchurch. These matters are considered to be complementary to, and not conflicting with, the NPS-UDC objectives and requirements. Such elements have also been included in recognition of Our Space's broader audience, which includes a mix of stakeholders, businesses, community groups and residents that are likely to expect some consideration of such elements as part of this growth planning exercise for Greater Christchurch.
- [62] We are satisfied that the overall content and specificity of Our Space is appropriate and accept the Officers' recommendation as set out in their reply.

***Accuracy and uncertainties of projected future demand***

- [63] Our Space adopts population projections that reflect recent growth trends in Greater Christchurch. The rationale for the adopted projections is set out in the Capacity Assessment. However, in short, the Capacity Assessment is based on the adoption of medium population projections for Christchurch City and medium-high projections for both Selwyn and Waimakariri Districts. This approach in the Capacity Assessment sought to "balance a desire to be 'ahead of the curve' when planning for growth, with ensuring that the financing and provision of new infrastructure is timely to support future growth needs."<sup>15</sup> A report published by the Ministry for the Environment and the Ministry for Innovation Business and Enterprise in July 2018<sup>16</sup> considered the demand assessment for Greater Christchurch to be best practice amongst high growth areas.
- [64] As summarised in the Officers' Report, submitters have questioned the ability to accurately determine projected demand, particularly over a thirty year period, and

---

<sup>15</sup> Our Space, Section 3.1, page 20.

how this might alter with changes in migration, working practices, uptake of new technologies and the impacts of affordability constraints. Submitters also questioned the veracity of the data used given Greater Christchurch's unique circumstances following the earthquakes.

- [65] Some submitters disagreed with the projected demand for specific needs and/or locations. For example, projected demand for industrial land in Rolleston and household growth in Waimakariri were considered to be under projected by some submitters. Submitters also questioned the appropriateness of the approach taken to set housing targets.
- [66] During the course of the hearings, we heard from a number of submitters who were critical of the Capacity Assessment methodology. Officers have accepted that there are significant uncertainties in determining future demand. This is reflected in the NPS-UDC requirements for ongoing monitoring and review of projections and targets as part of the periodic capacity assessments. Officers stated that subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ in 2020.
- [67] Officers have not recommended any changes to the adopted projections and targets set out in Section 3 of Our Space.
- [68] We address some of the specific issues raised further below. However, in general we are satisfied that the uncertainties of projecting future demand can be appropriately dealt with through the ongoing monitoring and review requirements of the NPS-UDC and the Schedule of Future Work identified in Section 6.2 of Our Space to improve the tools and evidence base underpinning Our Space. As the Capacity Assessment is updated, assumptions and projections can be amended should monitoring indicate that this is appropriate. In our view this is consistent with the requirements of the NPS-UDC which anticipates a frequently updated evidence base.

---

<sup>16</sup> Ministry for the Environment. 2018. *National Policy Statement on Urban development Capacity: Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*. Wellington: Ministry for the Environment.

***Appropriateness of methodology for determining commercial and industrial land capacity***

[69] Policy PC12 of the NPS-UDC requires a future development strategy to demonstrate that there will be sufficient, feasible development capacity in the medium and long term.

[70] We heard from a number of submitters challenging the appropriateness of the Capacity Assessment in relation to commercial and industrial land and whether Our Space provides sufficient feasible development capacity for business.<sup>17</sup>

[71] In accordance with Policy PB1 of the NPS-UDC, the Capacity Assessment, in so far as it relates to business, is required to:

(b) *Estimate[s] the demand for the different types and locations of business land and floor area for business, and the supply of development capacity to meet that demand, in the short, medium and long-terms; and*

(c) *Assess[es] interactions between housing and business activities, and their impacts on each other.*

[72] When carrying out the Capacity Assessment, local authorities are required to seek and use the input of iwi authorities, the property development sector, significant land owners, social housing providers, requiring authorities, and the provisions of development infrastructure and other infrastructure.<sup>18</sup>

[73] We understand from the Officers' Reply that engagement and consultation was clearly undertaken with stakeholders, and evidence was provided of this, including specifically, approaches to Christchurch International Airport Limited (**CIAL**) and LPC. Not only does this appear to be adequate, we consider it was comprehensive. We do note that it is unfortunate that opportunities to provide input were not fully taken up by some stakeholders.

[74] The Capacity Assessment shows a large surplus of industrial land in the Greater Christchurch area, both in the medium and long term and small localised shortfalls in commercial land that are not forecast to occur until near the end of the longer term planning horizon (2044).

[75] In the course of the hearings, while we heard from a number of submitters who were critical of the Capacity Assessment methodology, we were not given any specific

---

<sup>17</sup> Rolleston Industrial Holdings Limited (#73), Woolworth NZ Limited (#52), Cockburn Family Trust (#53), Christchurch International Airport Limited (#39).

<sup>18</sup> NPS-UDC, Policy PB5.

changes to improve it. We did not receive any assessment as to the relationship of existing business with those ports and freight hubs, or information as to how land is allocated in those areas by developers, based on need. No suggestions were made for specific changes to the Capacity Assessment methodology or how that should be undertaken.

[76] Some of the concerns raised with the Capacity Assessment related to having industrial land in the right place, particularly as it related to the ability to move freight to other freight hubs such as the Christchurch International Airport, Lyttelton Port, City depot (Lyttelton Port) and the inland ports located at Rolleston.

[77] Rolleston Industrial Holdings Limited asserted that the Capacity Assessment and recommendations flowing from it are fundamentally flawed as they do not allow for potential growth at and around the inland port. Ms Lauren Semple, counsel for this company, submitted at the hearing that the Officers' Report did not adequately address the submitter's concerns as it showed a fundamental misunderstanding of the drivers of demand. By utilising employee to floorspace/land area ratios, the demand for industrial land is underestimated as it relates to activities at i-Zone and i-Port. Mr Michael Copeland's expert economic evidence was that having the inland port at Rolleston means that industrial land demand will be driven by freight volume growth and trends in freight handling logistics rather than population or employment growth.<sup>19</sup>

[78] In Minute 2, we asked Officers to address us further on this matter as part of their reply. They referred to the Economic Future Model (**EFM**) used to determine future demand for business land, that has been peer reviewed and found to be robust and appropriate in informing the evidence base that is integral to Our Space. Officers consider that the EFM approach does include a broad assessment of the anticipated drivers of growth for industry sectors relating to the inland ports at Rolleston and the Christchurch International Airport and incorporates appropriate consideration of their larger land requirements per employee. Officers also addressed existing industrial development capacity at Rolleston and the Christchurch International Airport in their Reply Report.

[79] We are satisfied with this response and note the Officers' support for undertaking a collaborative and transparent piece of work (involving LPC, KiwiRail and CIAL) to ensure future freight needs are refined and further integrated with growth and

---

<sup>19</sup> Statement of Evidence of Mr Michael Copeland at [14].

transport models operating in Greater Christchurch. This is provided for in Section 6.2 of Our Space in Items 3 and 4 of the Schedule of Future Work.

- [80] We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from Officers and was provided to us, that it considered that the business land capacity and feasibility work done by the Greater Christchurch Partnership to be an example of 'best practice'.<sup>20</sup>
- [81] We accept that the Capacity Assessment is adequate for the present purpose and has been appropriately consulted on. However, as there will be improvements with any assessment model over time, we do consider it appropriate to recommend that as part of future Capacity Assessments, regard is had to demand and location of industrial and business land in close proximity to freight hubs. This will contribute to the consideration of overall capacity and sufficiency of industrial and business zoned land and may identify opportunities for consideration of specific areas feeding into the review of the CRPS.

***Requests for additional land to be included for future commercial and industrial development***

- [82] A number of requests were received for additional land to be provided for commercial and industrial use.<sup>21</sup> The consideration of greenfield business and industrial land is slightly different from that of residential land, as it does not have the same potential impact on intensification targets. Submitters placed emphasis on the supply of additional land keeping land prices low, and the addition of more sellers in the industrial land market increasing competition in a market that is dominated by a relatively small number of existing industrial land owners. Submitters also noted the existence of locational constraints (close to strategic freight networks) as well as the impact of ownership and development models, resulting in a lack of bare zoned land of different sizes.
- [83] We received a number of submissions that opposed general greenfield expansion, however none with a particular focus on the expansion of industrial or business land. Notwithstanding that, there are effects that are created by the expansion of greenfield

---

<sup>20</sup> Ministry for the Environment. 2018. *National Policy Statement on Urban development Capacity: Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*. Wellington: Ministry for the Environment at page 18.

<sup>21</sup> Foddercube Products Limited (#47), Rolleston Industrial Holdings Limited (#73), Woolworths (NZ) Limited (#52), Cockburn Family Trust (#53), Mrs Sally and Mr Ben Tohill (#40), R J Civil Construction (#35), Christchurch International Airport Limited (#39), Lyttelton Port Company (#67), Carter Group Limited (#76), Mr John Law (#92).

land for business purposes that are similar to those identified for greenfield residential land. That includes the contribution of it to urban sprawl, impacts on versatile and high quality soils, impacts on existing zoned industrial land, contribution of trip distances and private vehicle use on contribution to climate change, and impacts on the amenity of the rural land resource.

- [84] The Capacity Assessment shows a large surplus of industrial land in the Greater Christchurch Area, in both the medium and medium to long term. There are potential shortfalls in commercial space over the longer term. Officers advised that shortfalls in the long term will be met by transitioning industrial land over time and that future monitoring will identify the extent of any shortfalls. Mr Dean Chrystal, planning expert for Woolworths NZ Ltd expressed his concern with the Officers' approach to any shortfall of commercial land in the northern quadrant of Christchurch City, being that there is sufficient inner-city industrial land available to transition to commercial use to meet longer term needs; that future monitoring will identify the extent of any shortfalls; and that other methods available to meet more localised demands in the northern quadrant without needing to expand the urban boundary would be explored as part of subsequent capacity assessments and district plan reviews. Rather, Mr Dean Chrystal noted that other methods are not available to locate a supermarket and that a supermarket would not have distributional effects on surrounding key activity centres or the central city. We agree with the Officers that changes to the urban area need to be supported by wider analysis of business development in the north. We accept the Officers' position that opportunity needs to be provided for development of the Key Activity Centre at Northwood/Belfast, and that the proper opportunity to address this further is as part of the review of the CRPS.

*Land in close proximity to freight hubs*

- [85] We are, however, cognisant of the request from a number of property owners at Rolleston requesting additional land that has the ability to access a rail siding, for access to the Port of Lyttelton or the wider rail network. As noted above, we recommend that further work is done in the next Capacity Assessment in relation to demand and location of industrial and business land in close proximity to freight hubs. The next Capacity Assessment will inform the full review of the CRPS. In addition to this work, given the evidence that we have received from the Cockburn Family Trust<sup>22</sup> and Rolleston Industrial Holdings Limited<sup>23</sup> we consider it appropriate

---

<sup>22</sup> Cockburn Family Trust (#53).

that Environment Canterbury engages with these parties prior to the notification of the review of the CRPS in relation to the appropriateness of including their land within Map A of Chapter 6, in light of the results of the next Capacity Assessment.

- [86] Having regard to the evaluation and reasons given above, and the responses provided to individual submissions, we are satisfied that Our Space appropriately implements the provisions of the NPS-UDC as it relates to business land capacity. We note that additional refinement of the methodology as part of the next Capacity Assessment may inform additional changes as part of the review of the CRPS.

#### *Port of Lyttelton*

- [87] LPC was particularly concerned that it may have difficulty consenting development on future reclaimed land adjacent to the existing Port area, in Te Awaparahi Bay (**future reclamation site**). This is due to concerns that LPC's activities on its future reclamation site will be constrained by Objective 6.2.1 and Policy 6.3.1 of the operative CRPS if the future reclamation site is not identified in Our Space such that it can be identified in Map A when the CRPS is reviewed.
- [88] The geographic extent of Greater Christchurch, for the purposes of Chapter 6 of the CRPS and Our Space, is the area shown on Map A. The reclamation area facilitated by the Lyttelton Port Recovery Plan is not located within the Greater Christchurch Area shown on Map A. This is because the boundary of the Greater Christchurch Area shown on Map A represents the territorial authority boundaries at the time that Map A was inserted into the CRPS. As the reclamation area was not 'land' at that time it did not fall within the territorial authority boundaries. Therefore, the reclamation area is not within the Greater Christchurch Area shown on Map A and the provisions of Chapter 6 of the CRPS do not apply. Likewise, the reclamation area sits outside the geographic area of focus for Our Space. On that basis, we do not consider Our Space or Chapter 6 of the CRPS to be an impediment to activities on the future reclamation site and do not consider it necessary, or appropriate, to identify the future reclamation site in Our Space.

#### ***Focusing commercial activity in key centres and the 10-Minute neighbourhood and 8-80 concept***

- [89] One of the key approaches in terms of developing Our Space is consideration of the strategic growth directions of the UDS and CRPS, which support development

around Key Activity Centres, addressed in section 5.7 of Our Space. Consolidated growth enables towns and centres to more easily provide the local facilities and services that communities need and maximises the efficiency of key transport routes and other infrastructure services. Supporting the growth and vitality of Key Activity Centres is engrained in the UDS and Chapter 6 of the CRPS which provides direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres supports their vitality and viability.

- [90] Figure 19 of Our Space encapsulates this approach through use of a ‘10-minute neighbourhood’ conceptual diagram. The fundamental concept behind this is the ability for a resident to meet most of their everyday needs locally within a 10-minute journey from home, by either walking, cycling, or by public transport. The purpose behind it is to provide opportunities for modal shift away from private vehicle usage.
- [91] In the course of the hearing, we heard from several submitters supporting the 10-minute neighbourhood concept,<sup>24</sup> as well as comments from others seeking that priorities for centres should be revisited<sup>25</sup> or there should be identification of new centres such as a Key Transport and Economic Node (**KTEN**) at the Christchurch International Airport.<sup>26</sup>
- [92] We explored with officers the concept of the 10-minute neighbourhood, as well as the 8-80 cities model, that is, making city’s accessible for those between the ages of 8 and 80 as described in the submission of Mr Hawke.<sup>27</sup>
- [93] Officers recommended amended wording in Section 5 to provide a better explanation of Key Activity Centres and the connection with the 10-minute neighbourhood concept shown in Figure 19. We agree that the recommended amendments are appropriate.
- [94] Officers said that many aspects of the 10-minute neighbourhood are consistent with the 8-80 concept, including walkability, safe streets and places, and safe cycling

---

<sup>24</sup> Ms Suzanne Vallance (#18), Spokes Canterbury (#41), Canterbury District Health Board (#58).

<sup>25</sup> Woolworths NZ Limited (#52).

<sup>26</sup> Christchurch International Airport Limited (#39).

<sup>27</sup> Mr David Hawke (#10).

networks. However, they noted that whereas the 10-minute neighbourhood concept promotes accessibility as it relates to proximity, the 8-80 concept emphasises principles of accessibility as it relates to mobility and the need to provide inclusive, well-designed environments for all ages. It was the Officers' position that these more detailed urban design principles are supported and already captured by the NZ Urban Design Protocol 2005<sup>1</sup> referenced in CRPS Policy 6.3.2, so are more appropriately addressed in local design guides produced by territorial authorities.

[95] We accept the Officers' response to this and that no further changes are required to Our Space.

[96] We consider that the centres-based approach to providing for commercial land and floorspace remains the most appropriate to achieve NPS-UDC requirements and achieve the UDS vision and strategic goals. We note our discussion above that the refinement of data and methodologies relating to commercial and industrial land needs can be considered as part of subsequent capacity assessments and inform the monitoring and review aspects of the NPS-UDC requirements and the broader review of Chapter 6 of the CRPS.

### ***Sufficient feasible development capacity for housing***

[97] PC12 of the NPS-UDC requires the future development strategy to demonstrate two key outcomes in relation to housing:

- a. That there will be sufficient feasible development capacity available to meet housing demands in the medium and long term.
- b. Set out how the minimum targets for housing will be met.

[98] Our Space identifies the demand for housing and the associated minimum housing targets. The housing targets are being consulted on through Our Space and will be set by the Greater Christchurch local authorities and inserted into the CRPS and district plans in accordance with section 55(2A) of the RMA.

[99] In relation to demand, a comprehensive report on the demand profile for housing in Greater Christchurch was commissioned as part of the Capacity Assessment.<sup>28</sup> The report projects demand for:

- a. Housing in different groups within the population (age, household composition, income);

---

<sup>28</sup> Housing Demand in Greater Christchurch (November 2017) prepared by Livingston Associates.

- b. Different household groups translates into demand for different housing typologies (stand-alone homes; multi-unit dwellings; and apartments);
- c. Private owner occupier dwellings, private rented dwellings, and social housing (rented); and
- d. Housing typologies as distributed across broad locations and price points.

[100] The report revealed common trends likely for Christchurch City, Selwyn District and Waimakariri District over the next 30 years. Officers addressed these trends in the Officers' Report. They advised that while there is still strong demand for standalone, single storey dwellings in greenfield areas that must be supported, the Capacity Assessment clearly shows that there will be an increasing demand for smaller, more affordable dwellings that are more likely to be, although not exclusively, delivered through redevelopment and intensification of existing urban areas.

[101] In response to these trends, Officers advised that Our Space seeks to provide a balanced approach that provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the current projections.

[102] We understand that the housing targets for Greater Christchurch over the medium and long term, together with the territorial authority apportionment of the targets over the medium term, are based on projected demands for housing identified in the Capacity Assessment. It is only the territorial apportionment of the targets over the medium term that represents a transitional approach.

[103] Officers advised that this approach to targets seeks to respond to projected changes over the long term, rather than constraining growth in the districts to benefit development prospects and outcomes in Christchurch City.

[104] We also understand that in accordance with the requirements of PC1 of the NPS-UDC, margins of 20% in the short and medium term and 15% in the long term have been included to provide flexibility to allow for situations when developments are not brought to the market.

[105] As a Panel we must be satisfied that Our Space demonstrates that there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term. A number of submitters do not consider that Our Space demonstrates this. Key reasons include:

- a. Concerns in relation to the feasible development capacity underpinning Our Space, including the feasibility of developing geotechnically constrained land and more generally in relation to the feasibility analysis;
- b. Housing choices are not sufficiently provided for and more land should be provided to increase supply and improve affordability;
- c. The broad location, timing and sequencing of development is not sufficiently identified; and
- d. Our Space will preclude the consideration of future changes to Chapter 6 of the CRPS and the rezoning of land.

[106] We also had submitters concerned about urban sprawl and its associated effects. We address these matters in the following sections of our report.

[107] Our Space identifies that the overall amount of feasible housing development capacity in Greater Christchurch is sufficient to meet demand over the medium term. However, there is insufficient development capacity in certain locations within Greater Christchurch in the medium term and overall when we consider the long term housing demand. At the territorial authority level, Our Space records that given the range of reported feasibility, capacity in the Selwyn and Waimakariri Districts may not be sufficient to meet demand over the medium term, while the significant capacity in Christchurch City is expected to be sufficient over the next 30 years, even with a higher share of growth apportioned to the City over the long term period.

[108] These projected shortfalls are proposed to be met through:

- a. Redevelopment of existing urban areas in Christchurch City;
- b. Existing greenfield areas in Christchurch City, Selwyn and Waimakariri Districts; and
- c. New greenfield and redevelopment areas in Selwyn and Waimakariri Districts.

[109] A change to Chapter 6 of the CRPS is proposed to be progressed at the earliest opportunity to enable the Selwyn and Waimakariri Districts the flexibility to respond to identified housing need. Details of this change are set out in the Schedule of Future Work in Section 6.2 of Our Space.

[110] Additional capacity is to be directed in the first instance to the key towns of Rolleston, Kaiapoi and Rangiora in support of the public enhancement opportunities mentioned in Our Space. This is proposed to occur in the future development areas identified in Figures 15 and 16 of Our Space. **It is important to note that these areas are**

**located within the projected infrastructure boundaries identified on Map A of Chapter 6 of the CRPS and are totally consistent with the long term growth strategy in the UDS.** We understand that these new areas will provide much of the capacity required over both the medium and long term. A 2019 change to the CRPS would ensure that land can be rezoned to meet medium term capacity needs, and the longer term will be further considered as part of a comprehensive review of the CRPS. We note for completeness that Policy PA1 does not require development capacity over the long term to be zoned, it need only be identified.

### ***Feasibility analysis***

[111] We received evidence from a number of submitters in relation to feasibility. Mr Adam Thompson, an urban economist, undertook a feasibility analysis for GFR Rhodes Estate & Larson Group<sup>29</sup> and Suburban Estates, Doncaster Developments and Sovereign Palms.<sup>30</sup> Mr Thompson assessed the feasibility of capacity in the Selwyn and Waimakariri Districts. He concluded that there is an immediate need for additional land in Prebbleton and Rolleston and that for the long term there is insufficient capacity to meet the housing targets within Prebbleton, Rolleston and Lincoln. He considered that there is an immediate need for additional land in Rangiora and Kaiapoi and for the long term, out to 2048, there is insufficient capacity to meet the housing targets.

[112] CCC also raised concern in its submission that there was a misalignment in Our Space between the figures used for housing development capacity over the medium term and the need for intervention. This particularly relates to the figures included in Table 3 of Our Space for the Selwyn District. Officers addressed feasibility in the Officers' Report and further in their Reply Report in response to questions from the Hearings Panel.

[113] Officers noted that the text associated with Table 3 highlights that the feasibility assessments undertaken for Christchurch City, Selwyn and Waimakariri Districts produced a wide range of results, and that further work to improve modelling tools was underway. Updated feasibility assessments were completed for the Selwyn and Waimakariri Districts prior to the Our Space consultation, but too late to be incorporated into the Our Space document, so were included in the consultation as supporting material. Officers considered that to ensure alignment between the

---

<sup>29</sup> GFR Rhodes Estate & Larson Group (#60).

<sup>30</sup> Suburban Estates Ltd, Doncaster Developments and Sovereign Palms Ltd (#51).

assessments of sufficient, feasible development capacity and any related proposals in Our Space, it is necessary for a final Our Space document to be based on the best available information.

[114] Officers noted that further and ongoing refinement of the feasibility tools for Greater Christchurch, as well as discussions with landowners and developers, is considered to be critical to supporting a sound understanding of feasible development capacity and should be incorporated as part of the next Capacity Assessment due in 2020.

[115] The Officers also noted the timing of the next Capacity Assessment and the potential opportunity for it to inform any changes to district plans to address shortfalls in development capacity. It is recommended that the proposed change to the CRPS should proceed to provide the policy mechanism to respond to any identified needs in the District Plan reviews. The findings of the next Capacity Assessment will inform the review of the CRPS and any subsequent changes to the district plans.

[116] In summary, Officers recommended the following changes:

- a. Amended wording for Section 3.2, paragraph 3, p. 13 to identify the range of feasible development capacity figures produced for Selwyn and Waimakariri, as well as for Christchurch City, and the rationale for adopting a specific feasible development capacity figure for each territorial authority as the basis for determining sufficiency.
- b. Retain the current proposal to change the CRPS to enable additional development capacity in Selwyn and Waimakariri to help address the identified capacity shortfalls over the medium term.
- c. Additional wording in Section 3.2 that highlights that further and ongoing refinement of the feasibility tools will be undertaken by constituent partner councils and incorporated as part of the next capacity assessment due in 2020, and that this next capacity assessment should be used as the basis for making any zoning changes to address capacity shortfalls as part of the District Plan reviews for Selwyn and Waimakariri.

[117] Officers advised that while the findings from Mr Thompson's evidence differ from that reported in the Capacity Assessment and Our Space, the detailed methodology and assumptions included as part of Mr Thompson's assessment were not provided. This has limited the ability for the Officers, and the Panel, to test the veracity of the findings.

- [118] Conversely, an economic expert engaged by the NPS-UDC team in the Ministry for the Environment when developing the NPS-UDC and associated guidance, has extensively reviewed the methodology, costings and assumptions that form part of the Capacity Assessment and considered the work robust and appropriate in informing the evidence base that is integral to Our Space.<sup>31</sup> Like the Officers, we have weighed the evidence provided by submitters against the Capacity Assessment and findings of the peer review, and are satisfied that no further changes are required to Our Space.
- [119] We also note the legal advice provided to the Hearings Panel on the requirements of the NPS-UDC for assessing sufficiency and feasibility. We note from that advice that whilst the NPS-UDC lists matters that must be addressed when assessing demand, the weight to be given to each matter is at the discretion of the local authority.
- [120] Likewise, when assessing what is feasible, in order to assess whether or not something is commercially viable, a decision maker has the discretion to give the factors listed whatever weight it considers appropriate in the circumstances.
- [121] When assessing sufficiency, Policy PB3 of the NPS-UDC requires the consideration of relevant plans and proposed and operative regional policy statements, and Long Term Plans and Infrastructure Strategies prepared under the Local Government Act 2002 as a minimum requirement, but goes on to list a number of other matters for consideration. Again, the list is not exhaustive and local authorities are able to determine whether other factors would assist in the estimate of sufficiency. The matters that are listed in Policy PB3 are illustrative not exclusive and although those matters should be considered by the local authority, the weight to be attributed to those matters is at the discretion of the local authority, as is the ability to consider other matters perceived to be relevant.
- [122] We agree that the decision as to the appropriate balance between the matters in Policy PB3 rests with the local authority. We also reiterate that the NPS-UDC anticipates that the evidence base used to inform planning decisions will be frequently updated.<sup>32</sup>

---

<sup>31</sup> Ministry for the Environment. 2018. *National Policy Statement on Urban development Capacity: Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*. Wellington: Ministry for the Environment.

<sup>32</sup> NPS-UDC, Objective OB1 seeks a robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments.

- [123] We also note that Mr Thompson's assessments were narrow, based solely on supply within specific townships and did not consider a broader scale recognising the interconnected nature of the Greater Christchurch environment. We do not consider that the NPS-UDC anticipates such a narrow approach. We were encouraged and have chosen to take a broader, and more strategic view, and consider that it is appropriate to look wider across all of Greater Christchurch, noting that the policies in the NPS-UDC are not restricted to the boundaries of the Urban Area. It is only the Officers who have provided an analysis of the entire area.
- [124] We consider that it is appropriate to consider Greater Christchurch as a whole housing market, albeit that there might be higher demand in some areas than others that will lead to price differences whether they are within the bounds of Christchurch City, or within the townships of the Waimakariri and Selwyn Districts. This properly reflects the co-ordinated approach that is strongly encouraged by the NPS-UDC. We do not agree with Mr Adam Thompson's proposition that growth must be catered for in every location where there is demand, particularly when the demand for housing can be met by supply elsewhere. The NPS-UDC does not prescribe the level of detail at which 'different locations' is to be assessed. Nor does it direct where or how shortfalls of development capacity are to be met.
- [125] We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from Officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>33</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports.

#### *Geotechnical constraints*

- [126] A number of submitters raised the issue of feasible development not taking into account the geotechnical constraints on land.<sup>34</sup> Another submitter addressed a requirement to improve land that was currently considered TC3 following the Canterbury earthquakes as part of subdivision and the costs associated with it

---

<sup>33</sup> Ministry for the Environment. 2018. *National Policy Statement on Urban development Capacity: Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*. Wellington: Ministry for the Environment at page 8.

<sup>34</sup> Mr Lloyd Bathurst (#1), Inovo Projects (#29), and Suburban Estates Ltd, Sovereign Palms Ltd and Doncaster Developments (#51).

meaning that some development was not economically feasible.<sup>35</sup> Mr Lloyd Bathurst, a submitter on Our Space, further noted that matters relating to liquefaction had not been adequately identified on the hazard constraint maps.

[127] The Officers' position was that geotechnical constraints on land had already been taken into account as part of the Capacity Assessment. They noted that this was outlined in the technical appendices of that assessment, for housing development capacity, and modelling incorporated high-level subdivision costs specific to Greater Christchurch and for each Greenfield Priority Area. The costs were provided by Harrison Grierson, an engineering company with significant local experience. The Harrison Grierson assessment included:

- Overall land preparation costs including excavation, filling and other ground preparation. The costs associated with site preparation recognised the variable nature of soils, the assumed TC rating, risk of contaminated soils and effects of (high) groundwater.
- The cost, per linear meter, for roads, waste water, local stormwater and water connections.
- The costs associated with any larger scale stormwater mitigation, such as retention basins and treatment reserves. Where appropriate this would be calculated as a Development Contribution discount (i.e. the cost would be captured).
- Costs and fees associated with connections to trunk infrastructure and the provision of other non-Council infrastructure and services (e.g. power and telecommunications).
- Costs and fees associated with consenting, including final sub-division consent, adjusted for the approach adopted by each Council to charging for such services.
- An estimate of lot yield which will be used to calculate likely development contributions payable (less discounts for infrastructure works).
- Costs associated with marketing and advertising of new subdivisions.
- Other professional fees and costs not captured elsewhere.

---

<sup>35</sup>

Gillman Wheelans (#19).

[128] The Officers advised that geotechnical considerations were also factored into the feasibility modelling for redevelopment capacity in existing urban areas of Christchurch City. That assessment was undertaken by quantity surveyors WT Partnership who, Officers advised, have extensive experience of advising on property redevelopment costs in the Christchurch market.

[129] We accept that the question of feasible development is appropriately assessed in relation to geotechnical constraints, and what is determined as 'feasible', and that the Capacity Assessment is fit for our purpose. In addition, we note that the economics relating to the ability to remediate or rehabilitate land will change over time, and could well depend on land market fluctuations, remediation techniques, the original purchase price of bare land, and holding costs. Monitoring undertaken by the Greater Christchurch Partnership will be able to better flesh this out over time, which will inform future Capacity Assessments and provide historical information as to uptake.

[130] In relation to the impact of geotechnical constraints on yield, we observe that net density for Greater Christchurch, as defined in the CRPS, specifically excludes areas that are geotechnically constrained from the requirements of net density policies as follows:

*Net density means the number of lots or household units per hectare (whichever is the greater). The area (ha) includes land for:*

- *Residential purposes, including all open space and on-site parking associated with residential development;*
- *Local roads and roading corridors, including pedestrian and cycle ways, but excluding State Highways and major arterial roads;*
- *Local (neighbourhood) reserves.*

*The area (ha) excludes land that is:*

- *Stormwater retention and treatment areas;*
- *Geotechnically constrained (such as land subject to subsidence or inundation); [our emphasis]*
- *Set aside to protect significant ecological, cultural, historic heritage or landscape values;*
- *Set aside for esplanade reserves or access strips that form part of a larger regional or sub-regional reserve network;*
- *For local community services and retail facilities, or for schools, hospitals or other district, regional or sub-regional facilities.*

[131] Given the requirements to meet certain densities, this information will be included with any future rezoning proposals and outline development plans, so it is easily monitored.

[132] We are satisfied that the issue of geotechnically constrained land is adequately addressed in the assumptions behind the capacity assessment and CRPS, and no changes are recommended to Our Space in relation to these matters. We are satisfied that continued monitoring will help to develop a better picture of the impact of residential yield in greenfield priority areas and future development areas.

***Management of densities in greenfield priority and future development areas***

[133] We had a range of submissions,<sup>36</sup> seeking higher densities, particularly in relation to the settlements of Rolleston, Kaiapoi and Rangiora while other submissions<sup>37</sup> sought greater flexibility in the density requirements.

[134] Officers reconfirmed their view that the evidence base to support any change is not yet sufficient and that a specific and timely piece of work is required to establish a robust and agreed position on this matter. They noted that Policy 6.3.7 of Chapter 6 of the CRPS sets minimum net densities and does not foreclose the opportunity for higher densities in greenfield areas through collaborative discussions between councils and landowners/developers to reflect specific market conditions or other relevant circumstances. They told us that this approach is encouraged by Officers in the interim ahead of resolution of this matter.

[135] We have considered a wide range of submitter views and evidence on this matter, and carefully considered that in relation to Future Development Areas, there is the possibility of a policy 'gap' in terms of minimum densities. Christchurch City Council considered that a minimum of 15 households per hectare in Rolleston, Rangiora and Kaiapoi would be appropriate. We heard from a number of developers who, in response to questions from the Hearings Panel, considered that 12 households per hectare was reasonably achievable, while others considered 10 households per hectare provided flexibility. We heard from others again who considered that lower densities might be required because of the presence of TC3 land.

---

<sup>36</sup> Mr David Hawke (#10), Mr Andrew Long (#13), Mr Michael Steadman (#014), Spokes Canterbury (#41), Mr Brendon Harre (#70), Christchurch City Council (#74).

<sup>37</sup> Mr Ivan Robertson, Mr Lindsay Blackmore and Mr Malcolm Main (#23), Gillman Wheelans (#19), Cathedral City Developments (#38), Mr David Tipple and Mr Barry Gallagher (#25), Inovo Projects (#29), Malc Dartnell (#81), Scarborough Hills Properties (#65).

- [136] Officers recommended amendments to the Schedule of Future Work in Section 6.2 to signal a commitment to undertake an evaluation of minimum greenfield area densities and amendments in Section 5.3.
- [137] In response to our request in Minute 3, the Chief Executives of the local authorities presented to us in relation to the density provisions that should apply to the future urban development areas in the Selwyn and Waimakariri Districts. The Chief Executives of Environment Canterbury, Selwyn District Council and Waimakariri Council recommended that Our Space direct an increase to the minimum density provisions in the Future Urban Development Areas in Selwyn and Waimakariri by 20 percent to 12 households per hectare as the basis for structure planning now being undertaken by those Councils and to be reflected in their respective District Plan Reviews due for notification in 2020. The Chief Executive for Christchurch City Council reiterated her Council's position regarding the Christchurch City Council's preference for 15 households per hectare.
- [138] The Chief Executives recommended that the Greater Christchurch Partnership work collaboratively over the next year to review and agree appropriate future density settings across Greater Christchurch to inform not just the District Plan reviews, but to also provide guidance on how density matters should be progressed as part of the full CRPS review comparable to transition paths to higher densities evident in other high growth council contexts. This would include the Greater Christchurch Partnership agreeing to a consistent methodology being used by all Greater Christchurch local authorities when completing required capacity assessments. The Chief Executives provided proposed replacement actions to achieve this in Our Space.

[139] We also requested from Officers additional tables that would show scenarios should density be managed differently in the Selwyn and Waimakariri Districts. This is included below:

Selwyn: Long term shortfall: 5,475

	Density scenarios and anticipated yields from FDAs <sup>^</sup>		
Theoretical additional capacity enabled in existing urban areas*	Density 10 hh/ha	Density 12 hh/ha	Density 15 hh/ha
0	4,700	5,650	7,050
500	5,200	6,150	7,550
1,000	5,700	6,650	8,050
1,500	6,200	7,150	8,550
2,000	6,700	7,650	9,050

Waimakariri: Long term shortfall: 7,675

	Density scenarios and anticipated yields from FDAs <sup>^</sup>		
Theoretical additional capacity enabled in existing urban areas*	Density 10 hh/ha	Density 12 hh/ha	Density 15 hh/ha
0	4,500	5,400	6,750
500	5,000	5,900	7,250
1,000	5,500	6,400	7,750
1,500	6,000	6,900	8,250
2,000	6,500	7,400	8,750
2,500	7,000	7,900	9,250

\* Subject to enabling this additional capacity via the District Plan Review and using other mechanisms outside of the District Plan to encourage infill/intensification development. Whilst more theoretical capacity may be enabled through District Plan Reviews, robustly calculating feasibility is also limited by a lack of comparable development that provides data (e.g. house sales) within zoned areas.

<sup>^</sup> This is derived from a total 'gross' hectare and does not take into account infrastructure requirements and structure planning that may reduce the developable area and total dwelling count.

[140] The figures are dependent on additional capacity being made available within existing urban areas via intensification. That might include up-zoning, provision of minor units, retirement village development, elderly persons housing, and subdivision.

[141] We are conscious that there is a potential for a policy gap for future development areas, as the current provisions of the CRPS only apply to greenfield priority areas, and that it is appropriate that we signal a **minimum** net density of 12 households per hectare for residentially zoned land in the Selwyn and Waimakariri Districts falling

within the Greater Christchurch area. This is intended to be determinative until such time as further evaluation and evidence is prepared as part of the full review of the CRPS. We are comforted by the Chief Executives' commitment to addressing these issues and are satisfied that in the mix of evidence received during the hearing, such a statement in Our Space, together with amendments to items in the Schedule of Future Work are both necessary and appropriate.

[142] We also consider that the figures provided to us by Officers are useful, and that they are included in Our Space at the end of Section 5, with an additional note that it is expected that a minimum density of 12 households per hectare will be achieved for new greenfield priority areas and future development areas as part of the district plan reviews, until such time as the CRPS is reviewed.

[143] We recommend that along with the reference to minimum net densities in the areas indicated above, the definition of net density in the CRPS is also referenced in Our Space.

***Monitoring and review and how this relates to feasibility and uptake***

[144] We asked Officers to address monitoring and review, and how this impacts on feasibility and uptake. They re-iterated that Section 6 of Our Space identifies the preparation of a new Capacity Assessment and regular monitoring of urban development indicators in the future work of the Greater Christchurch Partnership. They advised that this is a specific obligation on local authorities as set out in the objectives and policies of the NPS-UDC.

[145] Importantly, they noted that there are other existing monitoring processes already committed to and undertaken by the Greater Christchurch Partnership and partner agencies that will complement the specific NPS-UDC requirements. For example, a comprehensive outcomes monitoring framework already exists for the UDS. That framework reports progress towards strategic goals and outcomes tracked using a series of urban, environmental, community and economic indicators. They noted further examples such as the Canterbury Wellbeing Index, which brings together information about community wellbeing in Christchurch, Selwyn and Waimakariri, and the monitoring and review requirements of the CRPS and District Plans relevant to aspects of Our Space.

[146] Officers recommended an amendment to Our Space section 6.4 Research and monitoring, as follows:

*The Partnership publishes quarterly monitoring reports to track a series of core urban development indicators for Greater Christchurch. To improve our understanding of local market trends, the scope of these monitoring reports will be reviewed and expanded where appropriate to incorporate additional indicators. Monitoring trends in Greater Christchurch's residential, commercial and industrial markets are particularly important given the disruptions caused by the earthquakes, and the new normal that is being established as the recovery and regeneration effort progresses. It is important that this monitoring integrates with other monitoring processes at local and regional levels that will collectively help assess the achievement of the strategic goals of the UDS.*

[147] We consider that this is an important aspect of addressing a number of submitters' concerns regarding how feasibility and uptake is addressed through the implementation of Our Space. As time progresses, there will be continual improvement of Capacity Assessment methodology, which will increase the accuracy of forecasting and determining sufficiency of zoning/identification for future urban activities. We accept the Officers' recommendations in relation to this.

***Housing choices - Location and type of housing***

[148] A number of submitters have raised concerns that Our Space does not sufficiently provide for choices that will meet the needs of people and on that basis Our Space does not meet the requirements of Policy PA3 of the NPS-UDC.

[149] Submitters have provided evidence that demand is not being met in particular locations, particularly in the Selwyn and Waimakariri Districts, and that large lot and rural residential choices are not being provided for. We have addressed the appropriateness of the Capacity Assessment methodology in relation to demand above and turn now to consider Policy PA3.

[150] It is necessary to consider Policy PA3 of the NPS-UDC as a whole. Policy PA3 provides:

*When making planning decisions that affect the way and the rate at which development capacity is provided, decision-makers shall provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, whilst having particular regard to:*

- a) Providing for choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate business;*
- b) Promoting the efficient use of urban land and development infrastructure and other infrastructure; and*

c) *Limiting as much as possible adverse impacts on the competitive operation of land and development markets.*

- [151] As a non-statutory document prepared under the LGA, Our Space will be a relevant consideration for decision makers on RMA documents including the CRPS and district plans and therefore will have some influence on the way and the rate at which development capacity is provided in those documents.
- [152] First and foremost, Policy PA3 requires decision-makers to provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations. In doing so, decision-makers are required to have particular regard to the matters listed in clauses (a) to (c) of Policy PA3.
- [153] We consider that Our Space seeks to ensure that housing needs and preferences for current and future residents are met. This is clearly set out in the approach to housing demand and minimum housing targets in the Capacity Assessment, Our Space and the Officers' Report.
- [154] Our Space also recognises that there are other key growth issues for Greater Christchurch, including recognising post-earthquake trends and anticipating future drivers, integrating land use and transport planning and promoting a sustainable urban form that protects the natural environment, rural character and versatile soils. These contribute to the social, economic, cultural and environmental wellbeing of people and communities and future generations.
- [155] In addition to the number of submitters seeking the identification in Our Space of additional greenfield priority areas or future development areas, rural residential and large lot development, we also received a number of submissions opposing further greenfield development. The reasons for not wanting greenfield development included the contribution it can make to urban sprawl, impacts on versatile and high quality soils, impacts on intensification in the central city, contribution of trip distances and private vehicle use to climate change, and lower densities encouraging private vehicle usage rather than transport modal shifts to cycling.
- [156] We consider that the Our Space approach strikes an appropriate balance between the matters listed in clauses (a) to (c) of Policy PA3 in order to achieve the overall wellbeing outcomes.
- [157] Submitters have also referred us to the requirements of Policy PA4 which provides matters that decision-makers shall take into account when considering the effects of urban development. To the extent that this policy is relevant to our considerations as

part of Our Space, we consider that the costs and benefits of urban development as set out in Policy PA4 have been taken into account.

***Provision of social and affordable housing (Social and affordable housing action plan)***

[158] Social and affordable housing was an issue for a number of submitters<sup>38</sup> we heard, as well as other submitters<sup>39</sup> that were not heard. We address the individual submissions on these matters in Appendix 1, however we asked Officers about the social and affordable housing action plan, particularly in relation to the submission of Te Waipounamu Community Housing Network. We considered that more information and action around this matter would provide some relief to those submitters.

[159] Officers advised us that the action plan relates to Item 2 in the Schedule of Future Work outlined in Section 6.2 of Our Space. This states that the timeframe for developing the social and affordable housing action plan as being 2019-2020. Officers said the detail of the social and affordable housing action plan would become clear by implementing this action. However, should the Panel wish to provide additional clarity on this matter the following process steps and timeframes could be included as bullet points in Item 2:

- an MOU with the Greater Christchurch Partnership and the Network - July 2019
- A project plan and project lead resource - August 2019
- A good practice and/or barriers research component - October 2019
- A forum and or consultation component - December 2019
- A draft action plan - February 2020
- Integration and alignment with District Plan Reviews - April 2020
- Integration and alignment with Annual Plans - June 2020

[160] They noted that the development of this social and affordable housing action plan is not currently included in the 2019/20 Annual Plans of Partner Councils so the necessary staff and financial resources to undertake this work would need to be

---

<sup>38</sup> Mr Lloyd Bathurst (#1), Drucilla Kingi-Patterson (#5), Mr David Hawke (#10), Te Waipounamu Community Housing Network (#16), Grassmere Residents (#54), Canterbury District Health Board (#58), GFR Rhodes Estate & Larson Group (#60), Martin Pinkham (#61), Brendon Harre (#70).

<sup>39</sup> Peter Wells (#7), Pat McIntosh (#12), Andrew Long (#13), Christchurch City Council (#74), Wayne Phillips (#90).

confirmed as soon as possible. They said that given the subject matter Community Housing Aotearoa (**CHA**) could be approached to assist with resourcing and/or delivery of the development of the action plan.

[161] We agree that the wording submitted to us is appropriate for inclusion in Our Space.

***Identification of broad location, timing and sequencing of development***

[162] Our Space is required to identify the broad location, timing and sequencing of future development capacity over the long term in future urban environments and intensification opportunities within existing urban environments.<sup>40</sup> It needs to balance certainty regarding the provision of future urban development with the need to be responsive to demand for such development.<sup>41</sup>

[163] Some submitters considered that future development capacity is not sufficiently identified, suggesting that further areas should be mapped within Our Space.

[164] Figure 12 of Our Space sets out that housing demand will be met through redevelopment and greenfield areas. Figure 16 in Our Space identifies the Existing Urban Area together with existing Greenfield Priority Areas and Special Housing Areas. It also identifies the proposed locations of future development areas in Greater Christchurch.

[165] We asked Officers about the mapping notations under Figure 16 and for their opinion on the potential for confusion of this figure with Map A in the CRPS. We heard from a number of submitters who were concerned that Figure 16 would become Map A, with no flexibility for due consideration of merits for additional land as part of future RMA processes such as the review of the CRPS.

[166] Officers responded that they heard the concerns raised by submitters regarding the potential for confusion and misinterpretation due to similarities between Figure 16 and Map A.

[167] They told us that Figure 16 was intended to show the location of the future development areas identified in Our Space to help address projected housing capacity shortfalls for the Selwyn and Waimakariri Districts, for the purposes of meeting the 'broad location' requirements of the NPS-UDC.

---

<sup>40</sup> NPS-UDC, Policy PC13(a).

<sup>41</sup> NPS-UDC, Policy PC13(b).

- [168] They said it was not intended that Figure 16 would ‘set in stone’ the extent of changes to Map A in the future or preclude the consideration of minor boundary adjustments and/or other changes to Map A through separate RMA processes. Our Space would be a relevant consideration for decision makers in subsequent RMA processes as a strategy prepared under other Acts (Sections 66(2)(c)(i) and 74(2)(b)(i) of the RMA respectively). Whilst it is intended that Our Space provides some direction to inform such processes, Figure 16 would not be determinative. In the light of concerns raised by submitters, Officers recommended amending the title of Figure 16 and the wording in Section 5.3 to clarify this.<sup>42</sup> We agree with the intent of the Officers’ recommendation and consider that Figure 16 should be identified as being ‘indicative only’ and that corresponding amendments are made in Section 5.3.
- [169] As discussed above, the areas identified in Figure 16 are likely to address medium and long term shortfalls in capacity. The location of any additional areas required is to be considered as part of the full review of the CRPS and through district plans and structure planning. This is provided for in the Schedule of Future Work in Section 6.2.
- [170] We also heard from a number of submitters concerned with staging and release of their land for development. Some submitters considered that Our Space does not sufficiently identify the timing and sequencing of development. In addition, several submitters sought that their land be released at the earliest opportunity or brought forward in time, including that land identified as proposed future development areas in Figures 15 and 16 of Our Space be included instead as Greenfield Priority Areas.
- [171] Officers addressed the sequencing and staging of development in the Officers’ Report. They set out that Our Space does provide some high-level sequencing for the quantum of development capacity over the medium and long term by stating that the housing targets represent the development capacity that each council will seek to enable over the medium and long term. Officers considered that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use if enabled to do so through a change to the CRPS. This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas.

---

<sup>42</sup> Officer Reply Report, Question 12, page 17.

[172] Officers recommended a number of amendments to Our Space to further clarify how sequencing is to be addressed:<sup>43</sup>

*Amended wording for Section 5.5, p26*

Future growth areas identified in Figure 15 and 16 will require more detailed planning, technical assessments and consultation with landowners to determine more specific staging of development. Existing policies in Chapter 6 of the CRPS already provide clear direction which these detailed planning processes must give effect to, particularly Policies 6.3.2 to 6.3.7. They ensure the staging of development considers how to support good urban design, align with infrastructure needs and integrate with existing urban areas.

*Amended wording for Section 5.5, paragraph 3, p26*

*Associated policy wording is proposed to complement a change to the CRPS Map A. This will enable District Plan Reviews for Selwyn and Waimakariri Districts to, over the medium term, zone and otherwise enable development capacity in accordance with meeting the medium term housing targets incorporated in the CRPS. Reviews of targets and the sufficiency of development capacity are part of periodic capacity assessments and enable the CRPS and district plans to remain responsive to demonstrated need.*

We consider these amendments to be appropriate to meet the requirements of the NPS-UDC.

[173] Officers also provided further explanation to address what they considered to be some confusion amongst submitters and the view that future development areas in Our Space are only identified for the long term period. They confirmed that the term 'Greenfield Priority Area' is a product of the recovery timeframes associated with the Land Use Recovery Plan. Most Greenfield Priority Areas have already been zoned in district plans and it is intended that the change to the CRPS in 2019 will enable the Partner Councils to zone and otherwise enable a portion of future development area land necessary to address any sufficiency shortfall for the relevant medium term period identified through periodically collaboratively prepared Capacity Assessments.

[174] We are satisfied that this explanation appropriately addresses submitters concerns regarding the identification of their land as Greenfield Priority Areas.

---

<sup>43</sup> Officers' Report dated 8 February 2019 at page 28.

### ***Requests for additional land to be included for future residential development***

- [175] Many submissions sought to have additional areas identified for future residential development.<sup>44</sup> These must be balanced against a number of submissions requesting that we limit expanding into new or additional greenfield areas.<sup>45</sup>
- [176] The key reason for suggesting additional greenfield priority areas or future development areas was that the methodology for determining capacity through the Capacity Assessment undertaken in 2018 was flawed and that it did not provide a suitable evidential base for our decisions. We have addressed the appropriateness of the Capacity Assessment earlier in this report.
- [177] In addition to that, submitters considered that their individual circumstances had merit, given that their developments were serviceable, proposed on suitable land, could be master-planned because their sites were under single ownership or owned by a few, were contiguous with existing urban areas, that the targets in the NPS-UDC should not be considered minimums, and that non-inclusion of their land was an error. In addition, they said that provision of their land would increase supply, and therefore improve affordability. Ms Helen Broughton, a submitter on Our Space, also said that her preference was to provide greenfield development rather than intensification, as intensification would have an adverse impact on the character of her immediate area on the northern side of Riccarton Road.<sup>46</sup>
- [178] As set out above, the reasons for not wanting greenfield development included the contribution it makes to urban sprawl, impacts on versatile and high quality soils, impacts on intensification in the central city, contribution of trip distances and private vehicle use to climate change, and lower densities encouraging private vehicle usage rather than transport modal shifts to cycling.

---

<sup>44</sup> Mr Lionel Green (#21), Mr David Tipple and Mr Barry Gallagher (#25), Cathedral City Developments (#38), Mr Ernst Frei (#59), Cashmere Park Trust (#15), Dalkeith Holdings Limited (#20), Scarborough Hills Properties (#65), Mrs Sue and Mr Grant Poultney (#50), Spark Family (#6), Bellgrove Family Trust (#9), Oderings Nursery (#30), Mr Kevin Williams and Ms Bonnie Williams (#72), CJFA Holdings Limited (#24), Ellis Darussette Limited (#26), GFR Rhodes Estate and Larson Group (#60), Suburban Estates Limited, Doncaster Developments Limited and Sovereign Palms Limited (#51), Gillman Wheelans (#19), Ms Sharon Jones (#22), Mr Ivan Robertson, Mr Lindsay Blackmore and Mr Malcolm Main (#23), Ms Victoria Foxton (#27), M Springer (#28), Red Spur Limited (#43), Mr Graeme Alan and Ms Joy Yvonne McVicar (#56), B. Welsh, S. McArthur, T. Kain (#57), Lincoln Developments Limited (#69).

<sup>45</sup> Spokes Canterbury (#41), Mr Chris Morahan (#89), Mr David Hawke (#10), Mr Don Babe (#46), Mrs Cherry and Mr Lawrence McCallum (#36), Cashmere Park Trust (#15), Pat McIntosh (#12), Mr Ollly Powell (#48), Mr Robert Fleming (#80), Mr Kieran Williamson (#86).

<sup>46</sup> By way of note, the Independent Hearing Panel's full decision is made at para [128] of Decision 10. It noted that given all these factors, they did not consider it appropriate to revisit the election the Council has made against further intensification in this locality at this time. If, and when, this should occur ought to be left to the Council to determine and initiate.

- [179] What we need to be satisfied about, is that in terms of the NPS-UDC, Our Space demonstrates that there will be sufficient, feasible development capacity in the medium and long term. This includes intensification opportunities, as well as greenfield development.
- [180] We agree with the Officers' recommendations that additional land proposed by submitters is not necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.
- [181] In addition, based on the evidence available to us, we do not consider that the additional land proposed by submitters is preferable to that identified in Our Space which has previously been considered by the Greater Christchurch Partnership and is consistent with the strategic directions of the UDS and CRPS to promote a consolidated urban form in Greater Christchurch, and aligns with infrastructure servicing arrangements outlined in Long Term Plans and infrastructure strategies.
- [182] We agree with Officers that additional land is best considered as part of subsequent RMA planning processes, including reviews of the CRPS and district plans, and relevant LGA processes, including structure planning. As set out earlier in our report, we have recommended amendments to ensure that Our Space does not preclude the consideration of further land that may be appropriate for future housing and business. We also agree that the key process steps in the review of Chapter 6 of the CRPS should be added to the Schedule of Future Work in Section 6.2.
- [183] We also recognise that there are a number of proposals for extension to residential areas that may warrant closer inspection as part of the CRPS review. We consider this should be acknowledged by including a requirement in Section 6.2 that Environment Canterbury engages with those submitters on Our Space who have sought that their land be included, prior to the notification of the review of the CRPS, in relation to the appropriateness of including their land within Map A of Chapter 6, in light of the results of the next Capacity Assessment.
- [184] We consider that these recommended amendments will ensure that the merits of the inclusion of additional land will be appropriately considered as part of the CRPS review.
- [185] We consider that the approach in Our Space, including the actions identified in the further schedule of work, balances certainty regarding the provision of future urban development with the need to be responsive to demand.

[186] In the light of the evaluation and reasons given above, and the responses provided to individual submissions, we are satisfied that Our Space appropriately implements the provisions of the NPS-UDC as it relates to development capacity for housing.

***Rural residential and large lot development***

[187] We heard from a number of submitters who were interested in the matter of large lot development and rural residential development both inside and outside of the existing and proposed future urban development areas.<sup>47</sup> They presented evidence noting the demand for such lots, and that such opportunities provided for better living opportunities and wellbeing.

[188] Officers told us that the CRPS Chapter 6 defines rural residential activities as “residential units outside the identified Greenfield Priority Areas at an average density of between 1 and 2 households per hectare.” They said Policy 6.3.9(3) of the CRPS requires that rural residential subdivision and development “must be located so that it can be economically provided with a reticulated sewer and water supply integrated with a publicly owned system, and appropriate stormwater treatment and disposal”. They said that this requirement suggests a close link to the urban area and its associated urban infrastructure. They referred to rural activities being defined in the CRPS as including residential activity on lots of 4 hectares or more.

[189] They said that irrespective of how Our Space incorporates rural residential living, the geographical area of focus and the relevant urban environment pertaining to Our Space are both considered to be the Greater Christchurch area, as shown in Figure 1 of Our Space. This area includes a portion of rural land significantly influenced by its proximity to nearby urban areas and although Our Space focuses predominantly on the urban aspects of Greater Christchurch it has considered rural residential and to a lesser extent rural living in its analyses.

[190] We agree with the Officers’ position that it is appropriate to take into account rural residential land in terms of calculations on capacity, and they contribute to Greater Christchurch’s ability to cater for residents, as does rural land. We note the existing CRPS direction in Policy 6.3.9 that in the case of Christchurch City, no further rural residential development is to be provided for. Any further rural residential development in the Selwyn and Waimakariri Districts will be considered as part of the Council’s scheduled reviews of their respective rural residential development

---

<sup>47</sup> Lionel Green (#21), Barry Gallagher and David Tipple (#25), Cathedral City Development Ltd (#38), Mr Kevin Williams and Ms Bonnie Williams (#72), Malc Dartnell (#81).

strategies. These reviews will inform District Plan reviews scheduled for notification in 2020.

[191] In relation to large lot sections, we agree with the Officers' response in their Reply Report and accept that no further changes are required to Our Space.

***Provision and protection of key infrastructure and integration with development***

[192] We heard from a number of submitters on the sufficiency of commercial and industrial land in specific high demand areas, in particular as they related to the rail and freight network.<sup>48</sup> As part of this, we heard evidence on the increase in travel times across the City from the west to the Port of Lyttelton, and the impacts of removing heavy vehicles from strategic freight routes. We heard about the importance of straight rail sidings at Rolleston and the potential for these, both within the existing urban and future development areas, as well as potential for extensions to those areas. We also heard about the future need for industrial land in appropriate locations adjacent to Christchurch International Airport.

[193] Officers told us that while the effective and efficient functioning of the transport network is not the main focus of Our Space, it does recognise in Section 5.6 that projected housing and business growth will result in more trips on the network, leading to more congestion and longer journey times if travel behaviours do not change.

[194] They said that a priority for Our Space is to ensure that future development is appropriately aligned to and informs long term transport planning and investment in Greater Christchurch, primarily considered as part of other processes, to ensure that more people can reside in areas accessible to a mix of transport modes. Of particular importance is alignment with the directions in the Canterbury Regional Public Transport Plan, which set out a vision for Greater Christchurch's public transport system.

[195] Our Space already recognises in Section 5.6 that an "important part of managing the transport network is to ensure that freight can be moved efficiently to and through Greater Christchurch and this will require effective management of congestion on the main freight routes". Officers noted that there are a number of other processes currently underway that will contribute to the effective and efficient operation of freight routes, including:

- future public transport business cases
- travel demand management business cases
- completion of the Christchurch Northern Corridor and Christchurch Southern Motorway
- business cases for the Brougham Street and Moorhouse Avenue area.

[196] In response to concerns from those submitters, Officers did make some suggestions for amendments by inclusion of additional wording as set out in the Officers' Reply<sup>49</sup> on pages 11 and 12. In addition to the text changes recommended, Officers also agreed with the submitters to better identify strategic infrastructure and networks in Greater Christchurch by way of amendments to Figure 18.

[197] To that extent, we accept the submitters concerns, and accept the changes proposed by Officers. We are satisfied that those changes are appropriate and accord with appropriate recognition of infrastructure, including regionally significant infrastructure, in the Our Space document. In addition to the changes recommended by Officers, we also include changes to section 5.7 which provide context and recognise the need for significant investment for the funding of transport infrastructure.

### ***Management of natural hazards***

[198] We received a number of submissions generally in relation to Our Space on the potential for natural hazards to impact on land development. We asked Officers to provide a response in relation to the extent to which natural hazards information is covered in Our Space and included as part of assessing the proposed directions outlined within it.

[199] They responded that there are constraints on where new greenfield development can and should occur. Officers said that such constraints include coastal and flood hazard areas, groundwater aquifers, outstanding natural landscapes, versatile soils and airport noise contours. The extent of these constraints is shown in Figure 10 (p. 17) of Our Space, while wording proposed by Officers in the track changed version of Our Space seeks to further clarify the scope and purpose of that figure.

---

<sup>48</sup> Christchurch International Airport Limited (#39), Cockburn Family Trust (#53), Lyttelton Port Company (#67), Rolleston Industrial Holdings Limited (#73), KiwiRail Holdings Limited (#79).

<sup>49</sup> Reporting Officers' Reply Report dated 8 March 2019.

- [200] In this context, they said that the future development areas proposed in Our Space have been subject to structure planning exercises by the Selwyn and Waimakariri District Councils as part of considering future development within the projected infrastructure boundary. The appropriateness of these greenfield areas for development would be further assessed as part of any change to the CRPS, including that any hazard risks are sufficiently addressed.
- [201] The possible impact of ground conditions on the feasibility of existing development capacity across Greater Christchurch was also considered as part of the Capacity Assessment, including the potentially higher costs of development within flood hazard areas where there is a requirement for higher finished floor levels and larger foundations. Where such costs resulted in development being deemed unfeasible, these areas were discounted from the equation of supply and demand. Officers said that this methodology is fully documented in the Capacity Assessment methodology technical document provided as part of the Our Space consultation.
- [202] Our Space also recognises in Section 6.1 the need to respond to key drivers of change at the local, national and global level as part of future planning processes, including the:
- “Growing need to manage and adapt to the natural hazard risk facing our coastal communities given the anticipated sea level rise, and related coastal inundation and groundwater level effects, over the next 30 years and beyond.”*
- [203] Officers said that subsequent Capacity Assessments and any future revisions to Our Space will need to reflect any changes to policy directions related to managing and adapting to the natural hazard risks facing coastal communities. No changes to Our Space were recommended.
- [204] We did not receive any additional closing response in relation to recognition of bird strike as a natural hazard as posed by CIAL. In relation to that matter, we are satisfied with the Officers’ recommendation in their report that bird strike hazard can be managed by appropriate location and design of some land uses and is not an absolute constraint on development. Officers consider that district plans are the appropriate planning document for managing bird strike hazard, noting that an appropriate set of rules is included in the Christchurch District Plan.
- [205] We accept the Officers’ position on these matters, and in particular, do not consider that the matter of bird strike is such that it would limit future urban use and is relevant to decision-making in relation to Our Space.

***Signalling matters needing to be addressed prior to full Canterbury Regional Policy Statement review***

- [206] We asked Officers how matters that have been addressed by us but not provided for specifically in Our Space will be approached and further detailed in any further investigation and resolution prior to the full review of the CRPS.
- [207] They said that while the scope of the proposed change to the CRPS in 2019 detailed in the Schedule of Future Work in Section 6.2 of Our Space is specific to giving effect to the NPS-UDC, the review of Chapter 6 as part of the full review of the CRPS would provide an opportunity for the merits of any wider policy changes to Chapter 6 or additional amendments to Map A to be considered.
- [208] Officers provided a potential list of steps and indicative timescales for the scheduled review of the CRPS. The review process would be initiated by Environment Canterbury in 2019/20 with the development of a project plan and agreed scope. Pre-notification engagement with the public and stakeholders would provide an opportunity for relevant matters that fall outside the scope of Our Space to be identified and further detailed.
- [209] They noted that in order to provide greater clarity within Our Space, key process steps in the review of Chapter 6 as part of the CRPS full review could be added to the Schedule of Future Work in Section 6.2.
- [210] Some submitters raised concerns that the proposals set out in Our Space would or could preclude the consideration of future changes to Chapter 6 Map A, in particular to provide for development in areas outside identified future development areas. As addressed above, while Our Space would provide some direction to inform future RMA processes, it is not intended to prevent the merits of such matters being considered through the full review of the CRPS.
- [211] We have recommended that Figure 16 is identified as being indicative only, and consider that while it will not address the concerns of some submitters seeking that their individual developments be brought forward or fast-tracked, it does provide some opportunity for consideration of the merits of particular proposals without being precluded by Our Space.

***Addressing climate change and achieving sustainability and zero carbon goals***

- [212] We heard from a number of submitters who considered that the effects of climate change, and the achievement of sustainability and zero carbon goals, were not

sufficiently addressed by Our Space and that any proposed settlement pattern was integral to considering such matters.<sup>50</sup>

[213] Officers considered that the proposals in Our Space reflect the UDS principles of consolidating urban development and integrating land use and transport planning. This supports the development of a more sustainable urban form, especially in terms of providing a larger share of the population with good access to a range of transport modes and reducing the reliance on private vehicles.

[214] They acknowledged that the coverage of climate change and sustainability and the implications of urban growth on these matters is limited in our Space and recommended that additional wording be included in Sections 4 and 5 to highlight these issues.

[215] We generally accept the Officers' response. However, we consider that a further response with regard to addressing climate change, achieving sustainability and zero carbon goals is required. We consider this issue merits its own new section under Section 4 in our Space, elevated to a higher priority, and amendments to section 5 of Our Space, with clearer and more aspirational wording.

## **CONCLUSION AND RECOMMENDATIONS**

[216] We consider it appropriate to conclude with a response to the key questions posed to us by Officers in the Officers' Report<sup>51</sup> in light of our recommendations above. In summary:

- a. We are satisfied that Our Space demonstrates that there will be sufficient feasible development capacity for housing in the medium and long term and that it sets out how the minimum targets will be met. The strategy sets out how the Partnership will respond to the shortfalls through future actions in Section 6, including through a change to the CRPS to enable the rezoning of future development areas identified in Figure 16 and the full review of the CRPS. We are satisfied, based on the evidence received, that those areas identified in Figure 16 are in the correct locations, on the basis of the current

---

<sup>50</sup> Mr Dirk de Lu on behalf of Spokes Canterbury (#41), Mr Chris Morahan (#69), Mr Lawrence McCallum and Mrs Cherry McCallum (#36), Dr Anna Stevenson on behalf of Canterbury District Health Board (#58), Mr Don Babe (#46) and Mr John Peet on behalf of Sustainable Otautahi (#37).

<sup>51</sup> Officers' Report, Section 1, page 1.

planning framework. That includes a mixture of greenfield development and intensification.

- b. In relation to industrial and commercial land, we are satisfied that the Strategy demonstrates that there will be sufficient feasible development capacity for business activity, noting the surplus industrial land can potentially absorb some of the predicted shortfall of commercial land in the medium to long terms. Further work around supply and monitoring around freight networks will inform whether or not there might be some locations where additional industrial land may be required. This can be undertaken to inform the full review of the CRPS.
- c. We are satisfied that the proposed areas to be identified for future urban activities are appropriately within the projected infrastructure boundaries, which are reflected in the relevant Council Infrastructure Strategies. Councils will be able to determine the timing and funding of that infrastructure in accordance with the sequencing to be determined as part of their District Plan review processes.
- d. We accept that under current planning frameworks, the methodology around feasibility is fit for our purposes, and gives effect to the NPS-UDC. We note this in the context of the ability to review and get consistent agreed methodologies between the Partner Councils so that this is incorporated into the next capacity assessment, as well as gathering and monitoring data to determine uptake, both through intensification as well as greenfield development. All of this will assist with informing capacity for the full review of the CRPS.
- e. We are satisfied that the broad location, timing and sequencing of future development capacity is identified at an appropriate scale in Our Space and that it is appropriate that this is addressed further as part of district plan processes, and in accordance with the policies and methods prescribed by the CRPS. That includes through the development of Outline Development Plans and structure planning processes.
- f. We are satisfied that Our Space is appropriately informed by the relevant Long Term Plans and Infrastructure strategies, and other relevant strategies, plans and documents. Our space is consistent with and builds on the vision and principles of the UDS and the direction of the CRPS by planning for

apportioned greenfield development and intensification, while maintaining a consolidated urban form, and integrating land use with infrastructure.

- g. We accept that the methodology and evidence base is sufficiently robust, recognising that monitoring of markets, yield and uptake will continuously improve the ability to respond to changing circumstances including higher or lower growth scenarios.
- h. In response to submitter concerns that Our Space will preclude the consideration of land for development in future RMA processes, we have made amendments to the strategy to note that Figure 16 is indicative only and that Environment Canterbury will engage with submitters requesting identification of additional land in Our Space prior to the notification of the CRPS review, in relation to the appropriateness of including that land in Map A and in light of the results of the next Capacity Assessment. This will ensure that the merits of those individual proposals can be legitimately considered as part of the CRPS review.
- i. In addition, we have identified in response to individual submissions where we consider there is another appropriate avenue to address a submitter concerns, such as through transport plans or through annual plan and long term planning funding processes.

[217] We are satisfied that the Strategy as set out in Appendix 2 meets the requirements of the NPS-UDC and has been prepared in accordance with the requirements of the LGA and those objectives and policies of the NPS-UDC that are relevant to the production of a future development strategy.

[218] We set out our further reasons and recommendations in response to individual submissions in Appendix 1.

[219] **We recommend that the GCP Committee adopts our recommendations report and recommend to the individual Partners that they adopt, endorse, or otherwise support Our Space, being the joint future development strategy for Greater Christchurch.**

[220] In addition to our recommendations on the Strategy, we make the following suggestions to the Partner Councils for actions outside of the Strategy process:

- a. As part of future Capacity Assessments, consider the impact of different ownership and development models as part of industrial land sufficiency in future capacity assessments
- b. As part of future Capacity Assessments, consider freight trends and demand in specific locations where there is a need to integrate land use and infrastructure
- c. Explore options for funding the social and affordable housing action plan set out in Section 6.2 of Our Space
- d. Christchurch City Council considers whether there are any options or alternatives available to facilitate, fund or enable infrastructure development at Cranford Basin, that was the subject of the Cranford Basin Regeneration Plan.

**For the Hearing Panel:**



**Bill Wasley**  
Chair



**Gail Gordon**  
Panel member



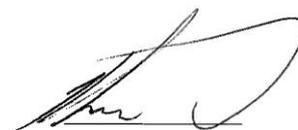
**Cr Sara Templeton**  
Panel member



**Deputy Mayor Malcom Lyall**  
Panel member



**Cr Peter Skelton**  
Panel member



**Cr Neville Atkinson**  
Panel member



**Jim Harland**

**Panel member (non-voting)**

**Jim Harland is a non-voting member of the Hearing panel. His signature acknowledges that he has participated in deliberations as a non-voting member of the Panel and supports the recommendations set out in this Report.**

**5 June 2019**

#### **APPENDICES**

**Appendix 1:** Hearing Panel recommendations on submissions

**Appendix 2:** Our Space document (including amendments recommended in the Addendum dated 5 June 2019 to the Report and Recommendations of the Hearings Panel).

**Appendix 3:** Hearing Panel Minutes 1, 2 and 3.

**Appendix 4:** Addendum dated 5 June 2019 to the Report and Recommendations of the Hearings Panel.

## **APPENDIX 1 - Hearing Panel recommendations on submissions**

This section provides the Hearing Panel's recommendations on each of the 92 individual submissions received on Our Space.

We have adopted the summary of the officers' submission points for ease of use but advise that each submission has been read by the Hearing Panel. Our recommendations on submission points below should be read in conjunction with our recommendations report.

Where we have accepted the recommendations of officers we have agreed with and adopted the reasoning of officers, unless otherwise expressly stated.

#### Lloyd Bathurst (001)

Notes there is significant housing development capacity available in Rolleston and would prefer a projections-led approach to housing targets to allow people to live where they want to live.

Hearing Panel discussion and recommendation:

We are satisfied that the officers' explanation in Section 4 of the report in relation to Themes 1 (accuracy and uncertainty of projected demands) and 4 (Need for further greenfield areas, including specific sites in each district) addresses this matter.

We note that Table 3 sets out the sufficiency of housing development capacity in Greater Christchurch in each of the territorial authority areas. We consider it is appropriate to enable the territorial authorities to determine appropriate locations for development depending on their ability to provide and plan for infrastructure. This provides certainty for developers as to which land will be released, providing a clear signal as to where to allocate resources to provide for development. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood.

We considered Mr Bathurst's submission and presentation to us, in particular with reference to not identifying areas of land subject to earthquake hazard risk (such as liquefaction), which we address below. We recognise that the development of some types of land in the region will have an impact on insurance premiums, however we also acknowledge that in the development of vacant land, ground and foundation design can ameliorate the impacts of earthquakes and reduce risk. We do not consider that, at this stage, substantial additional land needs to be released to address a shortfall in greenfield land at Rolleston.

In relation to rural residential land, the Canterbury Regional Policy Statement sets out a framework for consideration of these areas, and requires them to be included in a rural residential strategy in the case of Waimakariri or Selwyn District, or in the case of Christchurch City, no provision is made for further new rural residential land.

In summary, along with the matters we note above, we accept the officers' position on this submission and no changes are recommended in relation to the submission for the reasons set out above.

Notes that liquefaction and earthquake risk factors are not shown on the Natural Hazards map (Figure 10, p.17).

Hearing Panel discussion and recommendation:

Officers addressed the extent to which natural hazards information is covered in Our Space in their Reply Report and recommend amendments to section 4.1 to clarify the scope and purpose of Figure 10.

No expert evidence was provided to us by the submitter regarding the constraints that land has in terms of its development or what the economic costs of that may be, apart from anecdotal evidence regarding the cost of insurance excesses for commercial property. As such, we do not consider that the presence of geotechnical constraints necessarily prevents land from being developed. We accept the officers' position that only hazards that significantly influence decisions on where new urban development should locate are included. In particular, we note that the Canterbury Regional Policy Statement does not seek to avoid development in areas that may be subject to liquefaction, which is the case for new urban development in High Hazard Areas, for example.

We accept the officers' recommendation to amend Section 4.1 to clarify the purpose and scope of the hazard constraints map.

#### Floyd Rudolph (002)

Promotes industrial hemp farming, particularly for Christchurch red zone areas, and community blockchain.

Hearing Panel discussion and recommendation:

We accept the officers' comment that such matters are outside the scope of Our Space, and that the use of the Residential Red Zone is the subject of another planning process.

No changes are recommended in response to this submission point.

Supports bus lanes, and subsidised e-bikes, scooters and longboards that can go on buses for last kilometre travel.

Hearing Panel discussion and recommendation:

We note the submitters point. Officers responded that the operation of the public transport network is outside the scope of Our Space, and we accept this response.

No changes are recommended in response to this submission point.

#### Scott Boyce (003)

Unsure of the information available for the timing of the future development areas in Selwyn.

Hearing Panel discussion and recommendation:

Officers referred to the recommendations outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. In relation to this they recommend that sequencing is identified as part of structure planning processes and infrastructure servicing, which is best determined by the relevant territorial authorities. They noted that such processes would need to have regard to existing Canterbury Regional Policy Statement policy provisions, and recommended wording amendments to clarify this.

We accept the officers' recommendations on these matters, and accept the submission in part to the extent that the changes outlined in Theme 5 of the officers' report are made clarifying that sequencing will be addressed in the manner described.

#### John Dryden (004)

Queries why there is no discussion of the cultural aspirations of the majority of people who live in Christchurch.

Hearing Panel discussion and recommendation:

Officers referred to the vision, principles and strategic goals of the Urban Development Strategy for Greater Christchurch which is still relevant, and are reflected in section 2.3 of Our Space.

We accept the officers' position that no changes are necessary. No changes are recommended in response to this submission point.

Considers that the intensification of residential areas will fail unless good urban design principles are enforced.

Hearing Panel discussion and recommendation:

Officers referred to their recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the Central City) in the officers' report. This notes that Christchurch has many examples of high-quality residential intensification, and that these matters are best dealt with at a territorial authority level. We accept this and further note that Christchurch has recently been through a district plan review which addresses design matters comprehensively, and that Selwyn and Waimakariri District Councils are about to embark on their reviews.

We accept the officers' position that no changes are necessary. No changes are recommended in response to this submission point.

### Drucilla Kingi-Patterson (005)

Identifies upcoming and proposed events across New Zealand and considers that hosting such major events could affect how Greater Christchurch should develop.

Hearing Panel discussion and recommendation:

We heard from Ms Kingi-Patterson on these matters.

We accept the officers' position that such matters are outside the scope of Our Space, the purpose of which is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the strategic directions of the Urban Development Strategy. We accept the NPS-UDC does not require local authorities to consider the implications of major events on the approach to urban development.

No changes are recommended in response to this submission point.

Concerned that new development will affect civil defence zones and food producing farmland.

Hearing Panel discussion and recommendation:

Officers referred to the recommendations in the officers' report in Section 4 in relation to Theme 3 (Protecting productive, agricultural and high quality soils from urban expansion). They note that the review of the Canterbury Regional Policy Statement and district plans may need to consider the implications of a new National Policy Statement on Versatile Soils, which is being planned. There will be some existing areas that are already identified for development on versatile soils in the Greenfield Priority Areas of the Canterbury Regional Policy Statement.

In relation to evacuation zones in Greater Christchurch, officers noted that specific civil defence matters are the responsibility of the Canterbury Civil Defence Emergency Management Group and are therefore out of scope for Our Space.

We accept the officers' position that no changes are necessary, and no changes are recommended in response to this submission point.

Highlights the need for elderly care developments and suitable accommodation for people with disabilities, as well as affordable housing for people affected by shifting employment and workforce dynamics.

Hearing Panel discussion and recommendation:

Officers referred to Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) of the officers' report. They noted that Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded. They said that Our Space does not limit the potential for appropriate innovative housing options, and that these matters can be addressed through district plan reviews.

We accept the officers' position that no changes are necessary, and no changes are recommended as in response to this submission point.

Notes the need for light rail between Amberley and Ashburton, and Lincoln and the Central City.

Hearing Panel discussion and recommendation:

Officers referred to the recommendations outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport) in the officers' report. They note that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

No changes are recommended in response to this submission point.

Robert and Margaret Spark, and Richard and Dawn Spark, Spark Bros Ltd (006)

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development.

Hearing Panel discussion and recommendation:

We heard from Mr Geoff Spark in relation to this submission. He noted some features of the additional land he was seeking to have included as a greenfield priority area, including that it was close to proposed light rail, the town centre, the Southbrook Industrial Area and road links to Christchurch. Officers referred to their recommendations outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report. Officers concluded that they do not consider that additional land proposed by submitters is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

We note that in relation to other submissions seeking extensions to the urban area, the officers considered that the land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning. We consider this is an appropriate consideration in respect of this submission.

We acknowledge support for the existing identified Greenfield Priority Areas on the land, but make no changes to those other areas identified by the submitter.

No changes are recommended in response to this submission point.

Peter Wells (007)

Concerned about the impacts of greenfield development on arable and ecologically valuable land, the cost of extending infrastructure, the increased social isolation and the ability to achieve zero carbon goals.

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts), 3 (Protecting productive, agricultural and high quality soils from urban expansion), 10 (Provision and protection of key infrastructure, and integration with development) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals) in the officers' reports.

We generally accept the officers' position on those matters, however we consider a further response addressing climate change, achieving sustainability and zero carbon goals is required. We consider this issue merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of Our Space, with tighter, clearer and more aspirational wording. We accept the submission in part to the extent that changes to those sections are made.

Supports new forms of housing that help build closer communities and introduce more sustainable solutions.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 9 (Provision of social and affordable housing, and a range of housing types) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals) of the officers' report. As above, we recommend changes to give a greater focus on sustainability in Sections 4 and 5 of Our Space.

Considers that commercial developments should be focused in existing centres and should help to create quality, adaptable and liveable urban environments.

Hearing Panel discussion and recommendation:

Officers referred to Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') of the officers' report. This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation on this and to that extent, accept the submission point in part.

Notes support for rail services, and the opportunities this would offer for urban regeneration and revitalisation.

Hearing Panel discussion and recommendation:

Officers referred to Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport).

The submission point is noted. The option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

No changes are recommended in response to this submission point.

Considers that the existing three waters systems is already at capacity and susceptible to disruption, especially in the face of climate change, and that new innovative infrastructure systems could be explored.

Hearing Panel discussion and recommendation:

Officers referred to recommendations outlined in Section 4 in relation to Themes 10 (Provision and protection of key infrastructure, and integration with development) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals). They noted that while Our Space does not preclude opportunities to explore the use of innovative infrastructure systems, this is most appropriately considered by councils at the individual territorial authority level.

We accept the officers' position, and no changes are recommended in response to this submission point.

John Ascroft (008)

Supports more emphasis on cycling and walking, and less on cars and buses, especially in the Central City.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport). They noted that Our Space is principally

focused on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.

We accept the officers' position, and no changes are recommended in response to this submission point.

#### Bellgrove Family Trust (009)

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Rachel Murdoch, counsel for Bellgrove Family Trust, in relation to this submission. The trustees support the identification of their land as a Future Development Area in Our Space (considered to be the logical next step for development of the land) which is located east of Rangiora High School and is land that could be serviced. The trustees also seek identification as a Greenfield Priority Area as it can be reasonably anticipated that the medium term, through to 2028, will have well progressed before any zoning is determined. It was submitted that if the Panel determined that the land remain as a Future Development Area, amendments are required to the wording of Section 9 Action 8 which relates to changes proposed for the CRPS. In response to questions, Ms Murdoch recognised that the streamlined process, having not identified any particular issues or likely opposition to the zoning of the land, could potentially happen quite quickly.

The trustees also seek a change to the Projected Infrastructure Boundary to follow cadastral boundaries on the site.

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) of the officers report. Officers concluded that they do not consider additional land proposed by the submitter is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

Officers have generally recommended that additional land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning. It is proposed that a change to Chapter 6 of the Canterbury Regional Policy Statement be progressed using the streamlined planning process under the RMA, to ensure that future development areas necessary to meet development capacity needs can be rezoned as part of the upcoming district plan reviews.

We note that only those areas that are already identified in the Canterbury Regional Policy Statement as Greenfield Priority Areas are identified as such in the Our Space document. Officers provided an explanation on this as party of their Reply. We accept those reasons and agree that it is not appropriate to change areas that are identified as Future Development Areas to Greenfield Priority Areas in Our Space.

No changes are recommended in response to this submission point.

Considers that deferring decisions on when the identified future development areas may be developed until the District Plan Review stage could risk adding delays and uncertainties.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) of the officers' report. We accept the officers' position and again note that the proposed change to Chapter 6 of the Canterbury Regional Policy Statement will enable future development areas necessary to meet development capacity needs, to be rezoned.

No changes are recommended in response to this submission point.

Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.

Hearing Panel discussion and recommendation:

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) of the officers' report. At present, they consider there are significant uncertainties regarding future demand, which is why monitoring and refinement of Capacity Assessments will take place over time.

We accept the officers' positions that the projections and targets are appropriate, and no changes are recommended in response to this submission point.

David Hawke (010)

Supports the focus on redevelopment in Christchurch and highlights the negative externalities of recent greenfield expansion in Halswell, including the loss of versatile soils, diminished liveability and increased traffic congestion.

Hearing Panel discussion and recommendation:

We heard from Mr David Hawke in relation to his comprehensive submission.

Mr Hawke told us he bikes to work, and has appreciated some of the changes the Accessible City has brought, and is an example of some of the sustainability outcomes that Our Space is intended to bring. He said the default is endless spreading, increasing costs, and social inequality. He strongly supports central city development, a tightly controlled outer limit, and a focus on versatile soils.

He asked the Panel to stay strong in relation to requests to extend the urban boundary. The reason for this is related to his experience in Halswell, where development has spread on to high quality land. The layout in Halswell relies on cars to get around, with difficulties get buses through the suburb. Even so, Halswell still probably meets the '10 minute neighbourhood' concept. He noted that Knight's Stream has a higher density than would normally take place, and that it is working with a steady building of community.

He said that Our Space is a good opportunity to include guidelines to fulfil the vision of the strategy. He reiterated how the 10-minute neighbourhood is not necessarily a pleasant experience and accessible to all, and that this needs to be fleshed out. He discussed the idea of being 8-80 accessible, and that this would also achieve transport outcomes. He considered exemplars would also be beneficial.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) of the officers' report.

In relation to Mr Hawke's submission and presentation, we note the submitter's references to the negative externalities of recent greenfield development. We consider that with the amendments recommended by officers, Our Space addresses these concerns.

No further changes are recommended in response to this submission point.

Supports the focus on greenfield development in Rolleston, Rangiora and Kaiapoi, but considers that this land should be developed at a significantly higher density than currently achieved.

Hearing Panel discussion and recommendation:

Mr Hawke said that that provision of greenfield land around Rolleston and Rangiora rather than Christchurch was acceptable, but that more guidance was needed on how that development should take place. In relation to the new bits of Rolleston, it is his view that it looked like urban sprawl again.

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) and 4 (Need for further greenfield areas, including specific sites proposed in each district) of the officers' report. Officers did not support referencing a new minimum density for these areas in Our Space, but did consider that further work should be signalled regarding minimum densities for the 2022 Canterbury Regional Policy Statement review.

We have considered a wide range of submitter views on this matter, and carefully considered that in relation to Future Development Areas, there is the possibility of a policy 'gap' in terms of minimum densities. Christchurch City Council considered that a minimum of 15 households per hectare in Rolleston, Rangiora and Kaiapoi would be appropriate. We heard from a number of developers who considered that 12 households per hectare was reasonably achievable, while others considered 10 households per hectare provided flexibility. We heard from others again who considered that lower densities might be required because of the presence of TC3 land.

We consider that it is appropriate that we signal a minimum net density of 12 households per hectare for residentially zoned land in those parts of the Selwyn and Waimakariri districts falling within the Greater Christchurch area, noting that further evaluation will occur as part of the review of the Canterbury Regional Policy Statement in 2022. We are satisfied that given the mix of evidence received during the hearing, such a statement is both necessary and appropriate.

To this extent, the submission is accepted.

Notes the need for mixed developments that provide a range of social, affordable and market housing types.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) of the officers' report.

The submitters point is noted; no changes are recommended in response to the submission point.

Considers that commercial developments need to be aligned with sustainable transport options and that there is sufficient industrial land, particularly in Hornby and Rolleston, to support future growth.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (Transport needs and implications, including for public and active transport) and 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') of the officers' report. This was also addressed in the reporting officers' reply report (question 9). They noted the Capacity Assessment identified a significant over-supply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 of Our Space outlines these findings.

No changes are recommended in response to this submission point.

## Randal Inch (011)

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) of the officers' report. Officers concluded that they do not consider that additional land proposed by submitters is preferable to that

identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

We accept the officers' position and no changes are recommended in response to this submission point.

Considers that deferring decisions on when the identified future development areas may be developed until the District Plan Review stage could risk adding delays and uncertainties.

Hearing Panel discussion and recommendation:

Officers have generally recommended that additional land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning. We note that the proposed change to Chapter 6 of the Canterbury Regional Policy Statement will enable future development areas necessary to meet development capacity needs to be rezoned.

We accept the officers' position and no changes are recommended in response to this submission point.

Considers that a high growth projection scenario would be more appropriate for Waimakariri given recent trends.

Hearing Panel discussion and recommendation:

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). In summary, they said that there are significant uncertainties in determining future demand. This is reflected in the NPS-UDC requirements for ongoing monitoring and review of projections and targets as part of periodic capacity assessments. Officers said that subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ in 2020.

We accept the officers' position and no changes are recommended in response to this submission point.

Pat McIntosh (012)

Highlights the need to plan for sustainability and improved environments, and not allowing urban sprawl that encroaches on productive farmland, creates higher travel costs and reduces the sense of community.

Hearing Panel discussion and recommendation:

Officers referred to recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts), 3 (Protecting productive, agricultural and high quality soils from urban expansion), 6 (Transport needs and implications, including for public and active transport) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals) in the officers' report.

Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, and the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.

Identifies rent-to-buy schemes, shared equity and building higher density housing on brownfield sites as potential elements of a social and affordable housing action plan.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to theme 9 (Provision of social and affordable housing, and a range of housing types) of the officers' report.

They did not recommend additional changes in the officers' report, but as part of their reply, they included a timeframe for the development of the action plan. The matters addressed above will explore a number of different options in terms of providing for social and affordable housing.

We accept the officers' position that no changes are recommended in response to this submission point, however noting the officers' recommendations to include a timeframe for an action plan in Action 2 of Section 2.6

Considers that the projected growth is mostly related to immigration, which is politically controlled and unlikely to continue at the current rate, and that this approach is responsive rather than value-led.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands).

They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

We accept the officers' position that no changes are recommended in response to this submission point.

Andrew Long (013)

Disagrees with housing growth in the towns as they have an insufficient business and employment base to support such populations, meaning growth will lead to more commuter car trips and reduced sustainability outcomes.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts), 6 (Transport needs and implications, including for public and active transport) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals).

The Capacity Assessment identifies sufficient provision in the Selwyn and Waimakariri District Plans to meet the demand for industrial land over the long term, and for the most part, commercial space over the medium term. Section 3.3 of Our Space outlines these findings. Whilst acknowledging there will always be commuting between the towns and major employment areas in Christchurch City, Section 5.3 and Section 6.4 notes that improving the self-sufficiency of relevant towns is a key consideration of the district councils.

We accept the officers' position that no changes are recommended in response to this submission point.

<p>Considers that social and affordable housing should be located close to shops and services, and spread across Greater Christchurch.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) of the officers' report.</p> <p>The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. This action plan is covered in Section 5.1 and Section 6.2 of Our Space.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Considers that office space at the airport should be capped to encourage development in the Central City.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'). In addition, we note that this is a matter that could be addressed as part of the review of the Canterbury Regional Policy Statement in 2022. The Christchurch District Plan gives effect to Policy 6.3.8 of the Canterbury Regional Policy Statement which aims to limit impacts on Key Activity Centres and the Central City.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Concerned that the costs associated with delivering rapid transit would disproportionately fall on Christchurch City Council ratepayers and that the phasing of traffic signals in Christchurch disrupts and slows traffic.</p>
<p>Hearing Panel discussion and recommendation: Officers told us that such matters are out of scope for Our Space. The Greater Christchurch Future Public Transport Business Case will investigate the opportunity for rapid transit corridors in Greater Christchurch, including any appropriate delivery and funding arrangements. Traffic management issues in Christchurch City are the responsibility of the Christchurch City Council, and addressed through other processes and mechanisms.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Notes that few hazards are identified in Selwyn and Waimakariri on the Natural Hazards map (Figure 10, p. 17).</p>
<p>Hearing Panel discussion and recommendation: Officers acknowledged that the purpose and scope of this map, as well as other constraints maps in Figure 10, could be clarified in Our Space. We accept the officers' recommendation to amend Section 4.1 to address the submission to clarify the purpose and the scope of the natural hazard mapping.</p>

Michael Steadman (014)

<p>Highlights the need to protect high quality soils to retain the ability for low-carbon, self-sustaining food production.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 3 (Protecting productive, agricultural and high quality soils from urban expansion) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals) in the officers' report.</p>

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.

Supports higher density housing developments along transport corridors and considers that growth in the towns should only occur once rapid transit is in place.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 5 (Sequencing and staging of greenfield land) and 6 (Transport needs and implications, including for public and active transport). They said that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to Map A of the Canterbury Regional Policy Statement in 2019 as a result of Our Space).

We accept officers' recommendations to include wording in Our Space (Section 5.5 and Section 6 Action) to make it clear that detailed structure planning to determine the sequencing of future development areas will need to have regard to existing Canterbury Regional Policy Statement provisions to ensure a consolidated urban form, proximity to key activity centres, efficient infrastructure, and cohesion of new development with existing communities.

We also accept officers' recommendations to include wording in Our Space (Section 5.5 and Section 6 Action 8) to outline the intent of draft policy provisions to be considered in the 2022 review of the Canterbury Regional Policy Statement to demonstrate how future development areas are sequenced by territorial authorities in accordance with housing targets incorporated in the Canterbury Regional Policy Statement and sufficiency conclusions agreed as part of periodic capacity assessments.

#### Cashmere Park Trust (015)

Landowner seeks the inclusion of land (within the PIB) on Leistrella Rd, Christchurch for future development.

Hearing Panel discussion and recommendation:

Mr Warren Lewis, an engineer, but appear on his own behalf, presented to us in relation to the submission of Cashmere Park Trust<sup>1</sup>, for whom he is a trustee. Mr Lewis described the land as the closest rural land to the city centre, surrounded by zoned land which provides for 15 households per hectare, however the Trust's land is constrained to 4 hectare sites. The land forms part of the Henderson's Basin. Mr Lewis advised that only 20% of the land has ever been flooded, and that which was flooded was due to a blocked culvert. He described the Trust's desire to subdivide the land, through compensatory storage within Henderson's Basin. Mr Lewis was concerned that flood modelling by the CCC after the earthquake did not align with the changes in ground levels post-earthquake. He emphasised the presence of infrastructure, and that the site was not affected by climate change due to its elevation.

Officers do not support the inclusion of additional development in the Hendersons Basin area, on the basis that there is sufficient land available within the existing Christchurch area to cater for greenfield growth. We have considered the submitters request, and note that in relation to the land, we have not received expert evidence on the matter of flooding and flood heights, either from the submitter, or the Christchurch City Council. We do note that the Christchurch City Council, in the additional information it provided to us, did not consider that the site sought to be included by the submitter fulfilled its criteria for small, site

<sup>1</sup> Cashmere Park Trust (#15)

specific additions to future development areas.<sup>2</sup> We were not able to discuss or test the conclusions with the authors of that report. We must take a precautionary approach to that information, but it is relevant information for us to take it into account.

However, we do consider that the conclusion of the reporting officers in this situation is sound. That is, they do not consider that additional land proposed by submitters is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch. The land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Considers that restricting the supply of new housing sections in Christchurch will push up prices and force people out to the towns, and that the limited demand for intensive developments won't change as fast as anticipated.

Hearing Panel discussion and recommendation:

We have addressed the matter of supply of greenfield land above, noting that there is significant supply in the Christchurch area. When responding to this submission, officers referred also to Theme 9 of the officers' report regarding provision of social and affordable housing and having a range of housing types. They noted that Section 3.2 of Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded, increasing the need for smaller and multi-unit dwellings over time to complement the existing housing stock dominated by larger standalone houses.

We accept the officers' position on this. Monitoring and ongoing capacity assessments will continue to refine the predicted demand for housing types.

No changes are recommended in response to this submission point.

Notes that commercial developments in suburban locations should not be forgotten or disadvantaged by the planning framework.

Hearing Panel discussion and recommendation:

Officers referred to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. Officers did consider that better linkages could be made in Our Space as to the policy intent behind Key Activity Centres and the relationship with 10-minute neighbourhoods, and recommended changes to Section 5 of the Strategy. We did not hear from Mr Lewis in relation to this submission point at the hearing.

To that extent, we accept the changes recommended to us by officers, which address some of the submitter's concerns, by way of amendment. As a consequence, we accept the submission in part.

Considers that there is insufficient industrial land available as much of the land is owned by a few people who restrict development to maintain higher industrial land prices.

Hearing Panel discussion and recommendation:

We did not hear from Mr Lewis in relation to this submission point at the hearing. We are satisfied with officers' response that there is a significant over-supply of industrial land across Christchurch to meet demand over the long term.

<sup>2</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

No changes are recommended in response to this submission point.
Highlights factors that cause land shortages and development delays, including planning processes, delays from zoning, subdivision approvals and consenting, and limiting infrastructure through a rigid planning approach.
Hearing Panel discussion and recommendation: Mr Lewis did not present to us specifically on this submission point. Officers referred us to comment and recommendation outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure, and integration with development). They noted that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after adding margins to the projected demand to allow for situations when developments are either delayed or not brought to the market at all. Section 3.2 of Our Space outlines these findings. We accept the officers' response in relation to this matter.
No changes are recommended in response to of this submission point.
Notes that little account has been given to the future with autonomous vehicles and changing work practices.
Hearing Panel discussion and recommendation: We did not hear from Mr Lewis on this submission point. Officers recommended that regular monitoring of market indicators and trends will inform subsequent capacity assessments, which the NPS-UDC requires to be undertaken every three years. They advised that such assessments will enable councils to respond to any changing travel and workplace behaviours.  We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.
Notes that there is reference to Map A in Section 5.7 (p. 31) but that no map is provided.
Hearing Panel discussion and recommendation: Officers have recommended amending Section 5.7 in relation to this submission point, and consequential references are also amended.  We recommend that this submission point is accepted and corrections made.

#### Te Waipounamu Community Housing Network (016)

Supports the commitment to develop a social and affordable housing action plan and considers that the provision of community facilities and infrastructure should also be considered as part of such a plan.
Hearing Panel discussion and recommendation: We heard from Ms Jill Hawkey and Mr Peter Taylor for Te Waipounamu Community Housing Network. They expanded on their submission, providing examples of inclusionary housing in Queenstown, and wanting more definite information around the timing for the social and affordable housing action plan. They described concerns that affordable housing needs to be in reach of public transport, and advocated access to community facilities so that density is provided where there are services.  We sought further information in relation to this from officers in Minute 2. They amended their response and provided greater detail around the timing for the action plan. We accept the officers' recommendation that this information is included in Our Space. It is noted that the action plan is not currently identified in Annual Plans, and so we also recommended that this is considered as an action outside of the Our Space document.

#### Steve Holland (017)

Considers that social housing should be spread across Greater Christchurch and not grouped into any one area.

Hearing Panel discussion and recommendation:

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) in the officers' report.

The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. This action plan is covered in Section 5.1 and Section 6.2 of Our Space (as recommended to be revised above in in the body of our report).

We accept the officers' recommendations and do not recommend any further changes in response to this submission point, however noting the recommended changes to Section 6.2 to include a timeframe for the Action Plan.

Supports the protection of transport corridors, development of more public transport options, such as rail, and promotion of electric transport modes.

Hearing Panel discussion and recommendation:

Officers referred us to their comments and recommendation outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport). They said the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Suzanne Vallance (018)

Highlights issues related to poorly managed intensification, including the limited control over how these urban environments develop and the need for more place-making and participatory planning processes.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the Central City) in the officers' report.

They said that Our Space is a high level, strategic document that seeks to ensure there is sufficient land available to meet future housing and business demand across Greater Christchurch. The strategic planning directions set in this document will then be implemented through local planning processes, such as district plan reviews and structure planning, which will provide further opportunities for local consultation and input to place-making discussions.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Notes the need to consider the potential implications of new Government policy on versatile soils and suggests using the Copenhagen model of the 'hand' rather than concentric circles to support an integrated urban form.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendations outlined in Section 4 in relation to Themes 3 (Protecting productive, agricultural and high quality soils from urban expansion) and 11 (Addressing climate change, and achieving sustainability and zero carbon goals) in the officers' report.

They said that the urban form promoted in Our Space is consistent with the existing strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Any broader considerations of

<p>Greater Christchurch's urban form would be best considered during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of Our Space in the schedule of future work.</p> <p>We note that while some areas within Future Development Areas contain versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.</p> <p>We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.</p>
<p>Notes that a resilient city has suitable redundancy, diversity, modularity and distribution of commercial activity.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>
<p>Suggests solutions for housing an ageing population, including partitioning and building adaptable homes.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types). They noted that Our Space does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have some planning provisions in this regard and can consider this further through district plan reviews and changes.</p> <p>We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.</p>
<p>Supports the '10-minute neighbourhood' concept and considers that councils should have contingent funding to enable such ideas that surface as part of consultations.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report. Officers also addressed this further in their Reply Report (question 9) with respect to the 10-minute neighbourhood concept.</p> <p>Officers recommend amendments to section 5.7 to clarify the policy intent behind key activity centres and the connection with the 10-minute neighbourhood conceptual diagram in Figure 19.</p> <p>The allocation of funding in councils' Long Term Plans is out of scope for Our Space.</p> <p>We accept the officers' recommendations on this, including the recommended changes to section 5.7. We do not recommend any further changes in response to this submission point.</p>

Gillman Wheelans (019)

Considers that the availability of feasible development land in Christchurch is becoming constrained and that the expansion of such towns as West Melton, Prebbleton and Woodend could support capacity shortfalls.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. Section 3.2 of Our Space outlines the findings on the sufficiency of housing development capacity.

We were told that Our Space proposes future development areas in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls in Selwyn and Waimakariri. These future development areas align with the strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of Our Space in the schedule of future work.

We heard from Mr Hamish Wheelans in relation to his submission, who provided us with an overview of some of the costs and constraints in relation to dealing with TC3 land.

He noted the housing booms, when markets were strong, there was a greater desire for larger sections, whereas when the market was weaker, higher density development prevailed. He described the Delamane development at Yaldhurst which was developed at around 13.4 households per hectare. When the global financial crisis hit in 2006, that higher density development stopped as builders were not able to get finance. This was an example of how the development market changes. The increase in density requires more roading, and that change gets exponentially harder. In addition, costs are involved with remediation of TC3 land, either through the land itself or through foundation design. He did not agree that an urban limit is appropriate, in particular at West Melton.

In response to questions from the Panel, Mr Wheelans acknowledged that higher density living was growing, but that did not cater for everyone. He considered that this type of living was location based, and appropriate in the inner city, but not in the outlying suburbs. In terms of land cost, the difference between a unit in a greenfield site and a house on a single lot was not that great, and so the demand is much higher for those stand-alone houses. This compares to the city where the land is much more expensive, which creates a greater gap between standalone houses and apartments. He highlighted that land that was constrained by TC3 rated land would struggle to develop to an appropriate cost. He indicated that approximate costs for development of TC3 land could be between \$50-60,000, which would make it uneconomic to develop. He had not seen any examples of cheap foundations for TC3 land.

We agree with the position put forward by the officers. Updated capacity assessments will continually inform areas for development. This will lead to future planning and identification of land as part of future changes. The appropriate time to consider those additional areas is as part of the full review of the Canterbury Regional Policy Statement in 2022. We note that although Our Space does not discount the possibility that other land may be appropriate for future housing and business uses, it is important that any land identified for urban development is consistent with the strategic directions from the Urban Development Strategy and the Canterbury Regional Policy Statement that seek to promote a consolidated urban form in Greater Christchurch, and that it aligns with the infrastructure servicing arrangements outlined in Long Term Plans and infrastructure strategies.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Considers that the demand for multi-unit developments is overstated and that constraining land supply for greenfield subdivisions in Christchurch will increase costs and prices for housing.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 4 (Need for further greenfield areas, including specific sites proposed in each district) and 9 (Provision of social and affordable housing, and a range of housing types). They said that the primary purpose of Our Space is to demonstrate there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is provided in a way that aligns with the strategic directions of the Urban Development Strategy. This is achieved by assessing the development capacity of currently zoned areas and identifying new future development areas where there are projected capacity shortfalls, as is the case in Selwyn and Waimakariri Districts that are consistent with the Urban Development Strategy, district development strategies (Selwyn 2031 and Our District, Our Future for Waimakariri) and Long Term Plans.

We do not consider that demand for multi-unit development is overstated. Planned development will provide for a range of housing typologies, and demand changes over time.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Notes that private developers are unlikely to consider affordable housing without Government subsidisation.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in Our Space.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Considers that requiring commercial activity to locate in existing centres contradicts having shops and services that are accessible without the use of transport modes, and that there should be allowances for new centres.

Hearing Panel discussion and recommendation:

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report. Reporting officers also addressed this in their reply report in response to Question 9. They said that Our Space reflects the current Canterbury Regional Policy Statement policy direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.

Officers recommend amendments to section 5.7 to clarify the policy intent behind key activity centres and the connection with the 10-minute neighbourhood conceptual diagram in Figure 19.

We further note provision for neighbourhood centres in the district plans, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10-minute neighbourhoods.

We accept the officers' recommendations, and do not recommend any further changes in response to this submission point.

Considers that the projected growth for Selwyn is understated, and that growth is dynamic so ring-fencing the growth of towns based on currently known factors will result in inflexibilities.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report. They noted that in July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. The approach to territorial authority housing targets in Our Space allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term. It is in the apportionment by territorial authority that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazards which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Questions whether privately supplied infrastructure to encourage growth would be appropriate if it meant the population could have greater say in where and what form of housing they chose to reside.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure, and integration with development). They also noted that the evidence base associated with Our Space demonstrates there is sufficient capacity planned for other infrastructure to support the projected growth in Greater Christchurch. Our Space will need to monitor and review the effect of future growth on this infrastructure provision as part of subsequent capacity assessments, which includes engaging closely with infrastructure providers and operators.

We note that the request by the submitter is inconsistent with the Urban Development Strategy. We also note that the Council is usually vested with infrastructure and becomes responsible for that infrastructure. We are satisfied that the current approach to infrastructure, including the planning for it, is appropriately provided for in LGA infrastructure plans.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Fiona Aston, a planning consultant, in relation to the Dalkeith submission. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rangiora and has just 3 landowners. The site is within the projected infrastructure boundary (identified as the 'urban limit') in the first version of Proposed Change 1 (PC1) to the CRPS, which indicated the possibility of development from 2028 to 2041.

Ms Aston considered that the Dalkeith land should be identified for development before any other land outside of the projected infrastructure boundary. She sought that if sequencing were to take place, provision should be made to develop this land.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

We are satisfied that the proposed Change to Chapter 6 of the CRPS to enable the development of future development areas, the subsequent district plan review and the review of the Canterbury Regional Policy Statement in 2022 provide adequate timing for development.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Queries why the future development areas have not been identified as Greenfield Priority Areas and considers that deferring decisions on when these areas are developed until the District Plan Review stage could risk adding delays and uncertainties.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.

Hearing Panel discussion and recommendation:

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). In summary, they said that there are uncertainties in determining future demand. This is reflected in the NPS-UDC requirements for ongoing monitoring and review of projections and targets as part of periodic capacity assessments. Officers said that subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ in 2020.

We accept the officers' position on this, and no changes are recommended in response to this submission point.

Lionel Green (021)

Landowner seeks the inclusion of land (outside the PIB) on Marshlands Rd, Christchurch for development through changes to the CRPS that provide flexibility to respond to minor zoning anomalies or development proposals.

Hearing Panel discussion and recommendation:

Mr Green seeks to subdivide his land into two approximately two hectare lots. We heard from Ms Aston in relation to the request for flexibility around the urban edge. Ms Aston considered that development under 4 hectares could be considered on the 'urban continuum', and should be provided for in Our Space. Ms Aston referred us to the definition of urban environment in the NPS-UDC.

Ms Aston could only provide anecdotal evidence that there is a lack of supply of rural residential land. Officers provided a further explanation in relation to rural residential and large lot development in their reply.

We are satisfied with and accept the officers' recommendation that in terms of changes to existing policy this is properly left for the full review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended in response to this submission point.

Sharon Jones (022)

Landowner seeks the inclusion of land (outside the PIB) in Rolleston for future development, noting the imminent changes to the airport noise contours, and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Aston and Mr Phillip Kennard describe in relation to the submission of Ms Sharon Jones.

The combined area subject to the submission is just under 42 hectares adjoining existing Greenfield Priority Areas, and is located under the noise contours for Christchurch Airport. Ms Aston noted that Mr Matthew Bonis said that it was likely that the noise contours would be reduced at Rolleston and Kaiapoi. As such, they would like to identify that land in advance as Greenfield Priority Area. Ms Aston noted that the Future Development Area at Kaiapoi includes land that is located within the contour at Kaiapoi. In terms of the suitability of the land, it was defensible and created a consolidated urban form. She said it was close to the town centre, and could be serviced, even it wasn't in the Projected Infrastructure Boundary.

Mr Kennard said that the land met all of the criteria under the NPS-UDC for zoning urban land except for the airport noise contour. In response to questions from the Panel, Mr Kennard said that it would lend itself well to medium to high density development, as well as rest home type activities.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district), and reporting officers' reply report (question 13) regarding further investigation ahead of the review of the Canterbury Regional Policy Statement in 2022. They acknowledged the work being undertaken by Christchurch International Airport to trial alternative flight paths. The most appropriate process to consider the impacts on zoning from any changes to the airport noise contour is during the review of the Canterbury Regional Policy Statement scheduled for 2022. They noted the review is identified in Section 6.2 of Our Space in the schedule of future work.

We accept the officers' position and no changes are recommended in response to this submission point.

Requests that the status of future development areas, as amended to include the submitter's land, are changed to Greenfield Priority Areas to enable zoning and development to proceed.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

Hearing Panel discussion and recommendation:

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

Hearing Panel discussion and recommendation:

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri Districts over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response in greater detail.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Ivan Robertson, Lindsay and Judith Blackmore, and Malcolm Main (023)

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Aston in relation to the Robertson, Blackmore and Main submission. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

In relation to higher densities sought by CCC, she noted that Rolleston had been very successful without that requirement, and that it operated a high frequency bus service.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

We are satisfied that the district plan reviews and the review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

Hearing Panel discussion and recommendation:

We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

Hearing Panel discussion and recommendation:

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri Districts over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response. We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Aston and Mr Bob Patton in relation to the CJFA Holdings Limited Land, a 16 ha block adjoining Farrington. Ms Aston sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

Mr Patton said it was important to get affordable housing with a variety of house sizes noting that terrace housing was a potentially good outcome. Mr Patton said his client was happy to develop up to 15 households per hectare.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

We are satisfied that the district plan reviews and the review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

Hearing Panel discussion and recommendation:

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

Hearing Panel discussion and recommendation:

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri Districts over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Barry Gallagher and David Tipple (025)

Landowner seeks the inclusion of land (outside the PIB) in north-east Christchurch for future development as a Greenfield Priority Area that provides for large lot residential subdivision, and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from both Ms Aston and Mr David Tipple in relation to the submission from Barry Gallagher and David Tipple, seeking large lot development. We note that the net density for development under the Canterbury Regional Policy Statement excludes areas that are subject to geotechnical constraints, which can give rise to larger lot sizes. In addition to this, no information was provided in relation to quantification of, or supply or demand for larger lots, or the impact of this on the efficient use of the land resource. Mr Tipple provided us with his opinion about the need to provide larger lots for development. We do not consider that the densities recommended by us preclude provision for social development of children for the types of activities indicated by Mr Tipple. No information was provided to us that provision of further greenfield land was required due to a shortfall in capability to provide for housing in Christchurch City. We note the significant supply in the short term that is provided for in Table 3 of Our Space.

We accept the officers' recommendations that consideration of large lot or rural residential development outside of the urban area can be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended in response to this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

Hearing Panel discussion and recommendation:

We accept that officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

No changes are recommended in response to this submission point.

Ellis Darussette Ltd (026)

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

Hearing Panel discussion and recommendation:

We heard from Ms Aston and Ms Jeanette Ellis in support of the submission for Ellis Darussette. Ms Aston described how Ellis Darussette land was excluded from the Housing Accord Special Housing Area (HSA) over the neighbouring land. There is subdivision being undertaken on that land. No opportunity was given to join the SHA. The owners have been advised that because the land is not included in Map A of the CRPS, they are unlikely to get consent. She sought that the land be identified as a Greenfield Priority Area. It is

currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

We are satisfied that the district plan reviews and the review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept in part the submitters request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

Hearing Panel discussion and recommendation:

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Considers that it is appropriate to provide additional Greenfield Priority Areas in both Selwyn and Waimakariri to provide for demand over the medium term given the uncertainties associated with the assessments.

Hearing Panel discussion and recommendation:

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri Districts over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.
Requests that Figure 16 (p. 25) is amended to identify the submitter's land as a Greenfield Priority Area and show that it is not located within the Special Housing Area.
Hearing Panel discussion and recommendation: We agree that the submitter's land should not be identified as a Special Housing Area on Figures 15 and 16. We do not accept that the submitter's land should be included as a greenfield priority area for the reasons set out in response to the above submission points. We accept the submission point in part and recommend amending Figures 15 and 16 so that the submitter's land is not identified as a Special Housing Area.

Victoria Foxton (027)

Landowner seeks the inclusion of land (outside the PIB) on Port Hills Rd/Scruttons Rd, Christchurch for future development.
Hearing Panel discussion and recommendation: We accept the assessment in the officers' report which is set out in Section 4 Theme 4. Demand can be met for future housing needs through appropriate densities both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.  We accept in part the submitter's request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.
Considers that there are plenty of potential greenfield areas available in and around Christchurch for development, and that areas being encouraged for redevelopment and higher densities have had negative outcomes.
Hearing Panel discussion and recommendation: Officers referred to their recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the Central City) in the officers' report. This notes that Christchurch has many examples of high quality residential intensification, and that these matters are best dealt with at a territorial authority level. We accept this and further note that Christchurch has recently been through a district plan review which addresses design matters comprehensively, and that Selwyn and Waimakariri District Councils are about to embark on their reviews.  We accept the officers' position and no changes are recommended in response to this submission point.
Questions the role of Christchurch City Council in providing and funding social and affordable housing.
Hearing Panel discussion and recommendation: We refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types).  The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. However, specific details of such an action plan have yet to be determined. The action plan is discussed in Section 5.1 and Section 6.2 of Our Space.  We additionally note that submissions on matters such as provision and funding of social and affordable housing is also a matter for annual plan and long term planning processes.

We accept the officers' position that no changes are necessary, and as a result, no changes are recommended in response to this submission point.
Considers that commercial developments in suburban areas should not be disregarded as not all people want to shop in a mall or the Central City, and it is important that suburban communities are allowed to grow.
Hearing Panel discussion and recommendation: Officers referred to Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') of the officers' report. This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.  We accept the officers' recommendation and accept the submission point in part.
Questions why more industrial land shouldn't be made available instead of having enough to just meet demand.
Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (Transport needs and implications, including for public and active transport) and 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') of the officers' report. They noted the Capacity Assessment identified a significant over-supply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 of Our Space outlines these findings.  No changes are recommended in response to this submission point.
Supports the proposals for rapid transport corridors.
Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport) in the officers' report. We note support for rapid transport corridors.  No changes are recommended in response to this submission point.

M. Springer (028)

Landowner seeks the inclusion of land (outside the PIB) in Prebbleton for future development.
Hearing Panel discussion and recommendation: We accept the officers' recommendation in the officers' report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of areas outside the Projected Infrastructure Boundary should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.  We accept in part the submitters request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Inovo Projects (029)

Considers that additional greenfield land may be necessary in Christchurch as some identified greenfield areas will be unsuitable for development from a geotechnical perspective.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report.

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. The feasibility test considered geotechnical conditions. Section 3.2 of Our Space outlines the findings on the sufficiency of housing development capacity.

No changes are recommended in response to this submission point.

Notes that additional greenfield land may be required to meet demand in other towns, such as West Melton.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) , and reporting officers' reply report (question 13) regarding further investigation ahead of the review of the Canterbury Regional Policy Statement in 2022.

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. Section 3.2 of Our Space outlines the findings on the sufficiency of housing development capacity.

We were told that Our Space proposes future development areas in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls in Selwyn and Waimakariri Districts. These future development areas align with the strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of Our Space in the schedule of future work.

We agree with the position put forward by officers. Uptake and capacity assessments will continually inform constraints on existing areas identified for development. This will lead to future planning and identification of land as part of future changes. The appropriate time to consider those additional areas is as part of the full review of the Canterbury Regional Policy Statement in 2022, noting although Our Space does not discount the possibility that other land may be appropriate for future housing and business uses, it is important that any land identified for urban development is consistent with the strategic directions from the Urban Development Strategy and Canterbury Regional Policy Statement which seek to promote a consolidated urban form in Greater Christchurch, and that it aligns with the infrastructure servicing arrangements outlined in relevant Long Term Plans and infrastructure strategies.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Supports the approach of requiring a diverse range of housing but considers that the 15 households per hectare requirement for greenfield areas in Christchurch inhibits the delivery of housing diversity.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) and 9 (Provision of social and affordable housing, and a range of housing types) in the hearing reports. They considered the evidence base associated with Our Space demonstrates the need to enable a range of

housing types and identifies the matters that are likely to impact demand for different housing types over time. Our Space will need to monitor and review the anticipated scale and pace of changes to housing demand as part of subsequent capacity assessments.

We consider that in Christchurch city, provision for higher densities is required to avoid sprawl, as well as create a good environment that supports public transport patronage.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Supports commercial activities in the main town centres but considers that some activities may be better located outside these areas.

Hearing Panel discussion and recommendation:

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report. They said that Our Space reflects the current Canterbury Regional Policy Statement direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.

We further note provision for neighbourhood centres in the district plans, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10 minute neighbourhoods.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Highlights the uncertainties with the projected demands and the impacts of uncontrollable events.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers report. They noted that In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term. It is in the apportionment by territorial authority that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

#### Oderings Nurseries Limited (030)

Landowner seeks the inclusion of land (outside the PIB) on Cashmere Rd, Christchurch for future development.

##### Hearing Panel discussion and recommendation:

We heard from Mr Julian Ordering, Director Shareholder and Property Manager, and Mr Lewis in relation to the submission of Oderings Nurseries Limited. Mr Ordering confirmed that he wanted the Panel to enable him to develop his land through rezoning of both their Cashmere Road and Philpotts Road properties.

Officers do not support the inclusion of additional development in the Hendersons Basin/Cashmere flood plain area, on the basis that there is sufficient land available within the existing Christchurch area to cater for greenfield growth. We have considered the submitters request, and note that in relation to the land, we have not received expert evidence on the matter of flooding and flood heights, either from the submitter, or the Christchurch City Council. We do note that the Christchurch City Council, in the additional information it provided to us, did not consider that the site sought to be included by the submitter fulfilled its criteria for small, site specific additions to future development areas.<sup>3</sup> We were not able to discuss or test the conclusions with the authors of that report. We must take a precautionary approach to that information, but it is relevant information for us to take it into account.

We agree with the officers, who do not consider that the additional land proposed by the submitter is preferable to the land identified in Our Space, or is necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch. The inclusion of additional land is best considered as part of subsequent RMA planning processes, including review of the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including structure planning.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended in response to this submission point.

Identifies RMA processes, council charges and health and safety requisites as barriers to affordable housing.

##### Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in Our Space. As such, we consider that there are pathways to enabling affordable housing.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

<sup>3</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

Considers that public transport and cycling are unattractive modes of transport, and supports commercial developments in the suburbs and towns as they are more accessible by car than the Central City.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (Transport needs and implications, including for public and active transport) and 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept.

They noted that higher densities provide for modal choice, and if more people cycle or use public transport, this will reduce congestion.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Notes that greenfield developments located near existing infrastructure is advantageous for councils and residents.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure, and integration with development). The submission point is noted.

No changes are recommended in response to this submission point.

#### Car Distribution Group Limited (031)

Landowner supports the identification of land (within the PIB) on Johns Rd, Christchurch as a Greenfield Priority Area for business.

Hearing Panel discussion and recommendation:

Officers noted that this land is identified as a Greenfield Priority Area for business on Map A of the Canterbury Regional Policy Statement. However, the recent Christchurch District Plan Review concluded that this land could not be rezoned at that time. We are advised that further consideration of this matter is proceeding between the landowner and Christchurch City Council.

No changes are recommended in response to this submission point.

#### Infinity Investment Group Holdings Limited (032)

Developer with mixed-use developments (within the PIB) at Yaldhurst Park, Christchurch and Ravenswood, Woodend requests a projections-led approach to targets to ensure housing is not under-supplied in Waimakariri.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) and theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report.

They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends.

Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the review of the Canterbury Regional Policy Statement in 2022 is the appropriate time to consider identification of further areas.

We accept officers' position. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Majority Beneficiaries of the Bellgrove Family Trust; Gary Inch, Devin Inch, Sharlene Inch and Courtney Inch (033)

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development.

Hearing Panel discussion and recommendation:

We heard from Mr Courtney Inch on behalf of the Beneficiaries of the Bellgrove Family Trust, which supported the identification of its land for future development. Officers continue to support the current identification of the site.

No changes are recommended in response to this submission point.

Geoff Marks (034)

Notes the need to consider the development of tiny house communities as a new form of affordable housing.

Hearing Panel discussion and recommendation:

Officers refer us to comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) in the officers' report. They said that Our Space does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have planning provisions in this regard, and further consideration may be appropriate through district plan reviews.

We understand from officers that Christchurch City Council is currently working with the Canterbury Tiny House Society on its proposal for a temporary land use in the Ōtākaro Avon River Corridor Regeneration Area.

No changes are recommended in response to this submission point.

RJ Civil Construction (035)

Landowner seeks the inclusion of land (outside the PIB) on Sawyers Arm Rd, Christchurch for future development as a Greenfield Priority Area for business, thereby reflecting the current use of the site as a contractor's yard.

Hearing Panel discussion and recommendation:

We heard from Mr Fitzgerald in relation to the submission from R J Civil Construction. The site at 510 Sawyers Arms Road is currently operating as a contractors yard, operating under a temporary resource consent for business activities following the earthquakes. Mr Fitzgerald told us that the site has significant access advantages to arterial roads, which suited the civil engineering contracting business operating on the site. Including the site as an urban area would reflect the existing use on the site for vehicle storage. Officers referred to their general assessment regarding the need for further greenfield areas in Christchurch City.

We are cognisant of the role that the identified greenfield priority areas and future development area land has in providing a reasonable amount of certainty for rural amenity, particularly given that the projected supply of land for industrial and commercial purposes is considered to be sufficient for the next 30 years. We also note the temporary nature of the activity which is directly related to the earthquakes.

Given the above, we do not consider that expansion of the future development area for business land to incorporate the submitter's land to be appropriate. In this respect, we accept the recommendations as set out in Section 4 Theme 4 of the officers' report.

We accept the officers' position in relation to this submission and have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Concerned that Figure 16 (p. 25) does not reflect recent developments and existing land use activities.

Hearing Panel discussion and recommendation:

We accept the officers' position that the Map at Figure 16 is not developed at that scale and it is not appropriate to identify such detail. In addition, we note that there are various business type activities through the rural area that operate by way of consent, such as that at the submitter's location.

No changes are recommended in response to this submission point.

Lawrence and Cherry McCallum (036)

Considers that recent growth has represented controlled urban sprawl, which is a distortion of the UDS strategic direction and at the expense of providing well-designed medium density living in the central core.

Hearing Panel discussion and recommendation:

We heard from Mrs Cherry and Mr Lawrie McCallum in relation to their submission.

Mr McCallum said that a disproportionate amount of growth has gone to Selwyn and Waimakariri Districts, when it should have gone to the key activity and central cities and intensification. He hoped that the Partnership was a true Partnership, and that perhaps this was reflected in the different reports and submissions from Christchurch City Council.

Mr McCallum considered that more development should be going to the city, rather than to Waimakariri and Selwyn. More medium density was required in the central city for aging people that can walk to cafes, and that there needed a reboot of the public transport system. He did not consider buses would do it on their own, and there is a need to move to light rail. There is a need to integrate exercise to address the

obesity epidemic, and climate change needs to be addressed. He said this all points towards more medium density in the central city and better public transport. He said that we need to live in a climate friendly way. Mrs McCallum agreed and that investment in light rail needed to be made now, including separation between scooters, bikes and pedestrians.

In response to questions from the Panel, Mr McCallum did not want more effort put into getting people between Rolleston and Rangiora and the City, but did want to see more effort put into getting people from within Christchurch moving around, particular from the eastern Christchurch into the city. He said that aggregation of land would lead to better design.

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) and 7 (Poor intensification outcomes and preferences to focus intensification in the Central City). Officers noted that Our Space seeks to ensure there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is met in a way that aligns with the strategic directions from the Urban Development Strategy. With this in mind, over 80% of the development capacity identified in Our Space is already zoned in district plans, either in existing urban area zonings that enable redevelopment at higher densities (45%) or in undeveloped greenfield areas (36%).

We accept the officers' position that no changes are recommended in response to this submission point.

Supports providing a range of new housing types and developing a social and affordable housing action plan.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types) of the officers' report.

They did not recommend additional changes in the officers' report, but as part of their reply, they included a timeframe for the development of the action plan. The matters addressed above will explore a number of different options in terms of providing for social and affordable housing.

We accept the officers' position noting the recommendation to include a timeframe for the development of the action plan.

No further changes are recommended in response to this submission point.

Seeks more urgent provision for high frequency public transport and active transport modes.

Hearing Panel discussion and recommendation:

Officers referred us to their comments and recommendation outlined in Section 4 in relation to theme 6 (Transport needs and implications, including for public and active transport). They said the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Promotes putting power and telephone lines underground to improve the amenity of existing residential areas.

Hearing Panel discussion and recommendation:

Officers noted this. He said that this matter is more appropriately addressed through more detailed planning and development processes at a local authority level.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Seeks the retention of noise sensitive development policies surrounding the airport, protection of the unconfined aquifer from quarrying and development, and no development in floodplains and coastal hazard zones.

Hearing Panel discussion and recommendation:

Officers noted this. No changes are proposed to the matters set out in the submission point.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

### Sustainable Ōtautahi Christchurch (037)

Considers that planning for future growth needs must be firmly redirected towards the 'big picture' issues, such as zero carbon aspirations, with the risks of continuing along a path of market-led growth likely to become very clear within a generation.

Hearing Panel discussion and recommendation:

We heard from Mr John Peet for Sustainable Ōtautahi Christchurch. He said that changes from raw economic growth to wellbeing over the last few years had changed. He said that world-wide, there is a gathering storm of high level risks, which are outlined in the submission, including climate change, sea level rise, and depletion of high quality resources. The assumptions behind the study assume a linear environment, rather than one that will radically change. This requires an overarching risk-based philosophy to be adopted for the strategy. He argued that it needs to flexible, adaptable and evolutionary approach that is solutions-based, and it was his opinion is that the strategy would not deliver this, even though it is looking 30 years into the future.

Officers referred to the comment and recommendation outlined in Section 4 in relation to theme 11 (Addressing climate change, and achieving sustainability and zero carbon goals).

They said that Our Space seeks to balance the projected future demands of housing and business markets with the urban form that will best enable sustainable growth. This is reflected in the approach to setting housing targets, as outlined in Section 3.2, which is projections-led over the medium term and principles-based over the long term. They said that the proposed development of a social and affordable housing action plan also responds to the need for intervention. This action plan is covered in Section 5.1 and Section 6.2.

We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

To that extent, the submission is accepted in part, to better recognise those matters as set out above.

Notes that the consultation processes currently followed by government are seldom put forward in a way that encourages response for meaningful input from third sector organisations.

Hearing Panel discussion and recommendation:

Officers consider that the role of Third Sector Organisations as collaborative partners could be referred to more explicitly in Our Space. They recommend adding a reference to third sector organisations in the second para of section 6.3 beginning "Although the implementation...".

We accept Officers' position on this and recommend that it is amended accordingly.

Landowner seeks inclusion of additional land (outside the PIB) on Port Hills land, Christchurch.
<p>Hearing Panel discussion and recommendation:</p> <p>We heard from Ms Fiona Aston (planning) and Mr David Fox (surveying and land development) regarding the submission from Cathedral City Development Limited in relation to its land on Harry Ell Drive in Cashmere. It was submitted that large lot residential would be the most efficient use of the land which is served by public transport and provided for walking linkages. It was considered that the addition of 10 lots is very minor in the scale of the capacity figures in Our Space and it would be better to provide for development now, rather than waiting for it. Apart from anecdotal evidence, no information or analysis was provided to us on the market for large lot development land. We note that large lot development can be achieved anywhere throughout the city by way of amalgamation and/or purchase of adjacent titles at market rates.</p> <p>We accept the officers' comments and recommendations outlined in Section 4 in relation to theme 4 (Need for further greenfield areas, including specific sites proposed in each district). This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.</p> <p>No changes are recommended in response to this submission point.</p>
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.
<p>Hearing Panel discussion and recommendation:</p> <p>No recommendations were made by the submitter as to how this should be addressed in the housing capacity methodology. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>4</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.
<p>Hearing Panel discussion and recommendation:</p> <p>We acknowledge that there may be examples where some hill development will not necessarily be feasible to develop to its full potential, however we accept the officers' position that capacity for both Christchurch and over the Greater Christchurch area is catered for in the medium term, and that those estimates build in an additional capacity margin to address this situation.</p> <p>No changes are recommended in response to this submission point.</p>
Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p>

<sup>4</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

No changes are recommended in response to this submission point.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

Hearing Panel discussion and recommendation:

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.

No changes are recommended in response to this submission point.

### Christchurch International Airport Limited (039)

Advises that noise contours are currently being re-modelled with revised contours available in early 2019.

Hearing Panel discussion and recommendation:

We heard from Ms Jo Appleyard (legal counsel), Mr Rhys Boswell (CIAL operations and landholdings), Mr Greg Akehurst (economics), Mr Anthony Penny (transport) and Mr Matthew Bonis (planning) in relation to the submission and evidence presented on behalf of Christchurch International Airport Limited (CIAL). They described how the revised noise contours would be approximately 6 months away. Indications at present were that they would not be extended into areas of future development identified in Our Space.

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure and integration with development). They noted the comment from CIAL and said that this matter can be addressed as part of subsequent RMA processes, including the review of the Canterbury Regional Policy Statement.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Considers airport should be recognised as a Key Employment, Commercial and Transport Node and assists in providing for medium to long term commercial needs.

Hearing Panel discussion and recommendation:

CIAL seeks that the Projected Infrastructure Boundary is expanded, to identify a Future Development Area which will provide access (adjacent to the runway) to CIAL for logistics and freight in the next 10-30 years. Not providing for this use will lead to lower GDP contribution from Christchurch if the activities such as courier and manufacturing industries (which is then transported by air) cannot locate there, and business will be lost to other cities. CIAL considers that it is important not to preclude the ability of surplus land to become general industrial into the future.

Mr Rhys Boswell, General Manager of Strategy and Sustainability for CIAL, provided examples of activities that required easy access to runways. He described how land north of Memorial Avenue is not well set up and is spatially constrained, and how CIAL has tried to separate heavy vehicle movements from passenger movements. This has means that rental vehicle activities are focussed in the north, with freight in the south at Dakota Park.

Mr Anthony Penny, a traffic engineer, presented to us on traffic matters. He noted that extensions to Dakota Park are feasible from a traffic perspective, including links to bypass Hornby via Pound Road. Identifying Memorial Road as a potential rapid transit route, or at least a key bus route would help with assisting for upgrades, including provisions for cyclists and road widening.

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 7 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report.

Officers do not consider it appropriate to promote the airport as a location for a broad range of commercial uses; the primary objective of the Airport Zone is the efficient use and development of the land, infrastructure and operational facilities of the airport. Such use and development must also be undertaken

in a way that is consistent with the overall urban form of Christchurch City, including the centres based commercial strategy. Commercial and industrial zones provide for this wider range of employment sectors. While officers agree that the airport provides significant employment, it is not considered necessary or appropriate to introduce a specific new designation.

We accept the officers reasoning regarding this. In addition, we note that the airport already has special consideration and a framework around its operation as significant infrastructure. That term properly describes its function.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Suggests some airport land would be appropriate to meet identified shortfall of commercial land in the NW of Christchurch.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas (including specific sites proposed in each district) in the officers' report.

They said that the Business Capacity Assessment identifies a localised shortfall of commercial land in the northern quadrant of Christchurch City, and this (10ha) shortfall is not forecast to occur until near the end of the long-term planning horizon (i.e. 2044). Provision of capacity to meet longer term needs by expanding the urban boundary or otherwise enabling greater commercial floorspace at the airport is not supported by officers at this time because:

- there is sufficient inner-city industrial land available to transition to commercial use to meet longer term needs
- future monitoring will identify the extent of any shortfalls
- there are other methods available to meet more localised demands in the northern quadrant without needing to expand the urban boundary. These will be explored as part of subsequent capacity assessments and district plan reviews.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Seeks extension of the airport designation towards Ryans Road to accommodate air freight related distribution and warehouse activities.

Hearing Panel discussion and recommendation:

Officers noted that Our Space identifies a significant oversupply of industrial land across Greater Christchurch. If the submitter considers additional land is needed for designated purposes the appropriate process is for the requiring authority to pursue an alteration to the existing designation either through a new Notice of Requirement or an alteration to the existing designation as provided for under Part 8 of the RMA. That designation can be considered on its merits and if appropriate inserted into the relevant district plan.

Officers also addressed the evidence of Mr Gregory Akehurst (economics) in their reply. They noted that the evidence provided by CIAL suggests there will be a long term shortfall of industrial land within the Special Purpose (Airport) Zone (SPAZ) appropriate for logistics, distribution and freight activities that rely on proximity to the airport. The evidence of Mr Akehurst states there is currently approximately 120ha of vacant land immediately surrounding the airport. More detailed analysis of demand, take-up, related locational preferences and reported capacity constraints was not provided. Nevertheless, CIAL has sought additional land be identified for industrial purposes by Our Space outside the current SPAZ adjacent to the SPAZ and Ryans Road.

Officers noted that in recent years some airport land has been used for non-airport industrial uses, albeit permitted within the zone rules, such as commercial activities and development for trade-based activities (i.e. Bunnings). They said that while this may be considered necessary and appropriate to ensure the airport

has a reliable revenue stream and runs as a profitable business, it reduces the capacity for industrial use on existing SPAZ land. Officers do not support any changes to Our Space.

We accept the officers' recommendations in this regard, and do not recommend any changes in response to this submission point.

Seeks identification of an Airport to Central City Rapid Transit Route

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport). They noted that the Future Public Transport Business Case has identified the North and South-West Corridors as future rapid transit routes as they have future demand projections over the next 30 years that could support investment in rapid transit. They also have potential for land use growth. Demand and potential for growth on the Airport to Central City corridor is much lower. It is identified as a core high frequency bus route. Our Space (Section 5.2) does however identify that over time other corridors such as to the airport, to Linwood and Cashmere could be considered for rapid transit to stimulate redevelopment.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Seeks identification of SH1 (Johns Road/Russley Road) as a strategic freight route and acknowledgement of the need for significant upgrades along that route, in particular the grade separation at Sawyers Arms Road.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport) in the officers' report.

They said that the strategic freight routes were not identified in Our Space, as they are identified in other documents (such as the Christchurch Transport Strategic Plan). Instead SH1 (Johns Road/Russley Road) is identified as a State Highway on Figure 18.

Officers noted that the NZTA has completed a Programme Business Case which outlines future upgrades of Russley Road; e.g. the upgrade of Sawyers Arms intersection, and reshape of Harewood intersection. It would not be appropriate to include the level of detail sought by the submitter, in terms of the specifics of upgrades to roads or intersections, in Our Space.

In their reply, officers recommended:

- Amended wording for Section 5.6, paragraph 7 to make it clear that Our Space recognises that other processes are underway that will address specific transport-related matters, such as potential impacts arising from anticipated future growth in Greater Christchurch.
- Amended wording for Section 5.6, paragraph 9 that acknowledges the need to protect strategic infrastructure and networks in Greater Christchurch.
- Amending Figure 18 to better identify strategic infrastructure and networks in Greater Christchurch.

As a result, we accept the submission in part to the extent that changes to those sections are made.

Flood hazard map should show full extent associated with a breakout of the Waimakariri River.

Hearing Panel discussion and recommendation:

Officers said that the level of hazard to the Christchurch urban area and to the airport from a breakout from the Waimakariri River has been reduced to insignificant because of the construction of the secondary stop bank. However, they said that within the secondary stop bank floodplain there are high hazard flooding areas which could be shown on the map, to be consistent with this notation for the rest of the City.

As a result, we accept the submission and amend Figure 10 to depict the full extent of high hazard flooding areas.

Bird strike should be an identified hazard.

Hearing Panel discussion and recommendation:

Officers noted that bird strike hazard can be managed by appropriate location and design of some land uses and is not an absolute constraint to development. Officers consider that district plans are the appropriate planning document for managing bird strike hazard; and that an appropriate set of rules is included in the Christchurch District Plan.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Ben and Sally Tohill (040)

Landowner seeks inclusion of additional land (outside the PIB) on Marshs/Shands Road by CSM2 in Selwyn.

Hearing Panel discussion and recommendation:

We heard from Ms Nicola Rykers (planning consultant) and Mr Tohill in relation to this submission. The site is crossed by two arms of the CSM2 motorway leaving three distinct land areas that are contained on the same title. Parts of the site are now effectively landlocked, including by the motorway and other industrial land, and it is not economic to use. The Panel sought clarification as to any previous business activities on the site. Mr Tohill described the land, operated by PGG Wrightson, contained buildings with quite a strong industrial form. As a consequence of the zoning rules, the Tohills are not able to subdivide the land, which is separated by the motorway.

The officers' position is that the best time for consideration of what the future use of the land will be is as part of the full review of the Canterbury Regional Policy Statement in 2022. Generally, officers consider that given the over-supply of industrial land that provision of further industrial land as part of a future development area is not appropriate at this stage.

Having considered the evidence, we are satisfied that the Tohill's land presents a unique situation. However, we also consider that further information would be required as to rezoning of land or identification of it for urban development, given the buffer that is provided between industrial land and smaller block rural land to the south west. Detailed consideration should be given to the function and form of the land in the immediate area as part of the district plan review, and Canterbury Regional Policy Statement review.

We accept the officers' comment in this regard and we recommend amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Some land is now dissected by location and construction of CSM2 and more appropriate for industrial use.

Hearing Panel discussion and recommendation:

We refer to the above submission point.

The officers' position is that no new industrial areas are proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

We accept the officers' position and no changes are recommended in response to this submission point.

## Spokes Canterbury (041)

Suggests links are included to relevant documents – e.g. public transport routes, airport noise zone restrictions, urban boundaries, water shed protection areas.

Hearing Panel discussion and recommendation:

Officers noted that Figure 6 of Our Space identifies relevant plans, strategies and programmes, including the Regional Public Transport Plan, Canterbury Regional Policy Statement and District Plans.

We accept officers' position and no changes are recommended in response to this submission point.

Suggests that where a proposal is not directly committed to by other documents (e.g. 10 minute neighbourhood, complete cycle networks), make this clear and call for support; make clear what has the legislative and policy backing to be implemented and what still needs to be done.

Hearing Panel discussion and recommendation:

Officers noted that the proposals will inform the review of other documents and the ongoing work as outlined in Section 6.2 which seek to progress the proposals in Our Space.

We accept officers' position and no changes are recommended in response to this submission point.

Supports building higher density housing and commercial outlets on public transport routes and 10 minute neighbourhood concept – expand and apply these ideas better. Make sure neighbourhoods are close together and well connected by cycle networks.

Hearing Panel discussion and recommendation:

Officers referred to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. Officers did consider that better linkages could be made in Our Space as to the policy intent behind Key Activity Centres and the relationship with 10 minute neighbourhoods, and recommended changes to Section 5 of the Strategy. They also noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.

We are satisfied that these matters are adequately addressed in Our Space.

We accept the officers' position, and no changes are recommended in response to this submission point.

Mandate cycle networks within and between neighbourhoods and towns.

Hearing Panel discussion and recommendation:

We heard from Mr Dirk De Lu who spoke on behalf of Spokes Canterbury in relation to this submission point. Mr De Lu is concerned that there is little mention of cycling, or transport mode choice, and funding for these is, in his view, inadequate.

Officers noted the submissions. They also said that the Christchurch City Council had invested, and is planning to continue to invest, significantly in developing improved cycle infrastructure.

No changes are recommended in response to this submission point.

Drop greenfield developments which will only increase single occupancy vehicles; build housing where the jobs are; make sure higher density urban development offers features such as the 10 minute neighbourhood and affordability to attract residents.

Hearing Panel discussion and recommendation:

Mr De Lu said that does not focus on single occupancy cars, the impacts of sprawl, and not prioritising for climate change, sea level rise, and real sustainability. This leaves the members with real concerns that the plan will fail. It does not support the change needed to change people's habits or changing people's carbon emissions. Increasing urban density and providing for 10 minute neighbourhoods will help, but this will not be achieved by building on the fringe of the city. He said that affordability of living on the fringe of the city is not sustainable. He said that urban sprawl that requires subsidies from ratepayers is, in his view, not commercially feasible.

He said that it was important to put higher densities in the existing centres, and provide for jobs within those areas. Mr De Lu considered that the plan could reject the business as usual approach and deal with issues that arose out the earthquakes, by planning for development in the best places.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts), 7 (Poor intensification outcomes and preferences to focus intensification in the central city) and 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood').

Officers noted that Our Space seeks to ensure there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is met in a way that aligns with the strategic directions from the Urban Development Strategy. With this in mind, over 80% of the development capacity identified in Our Space is already zoned in district plans, either in existing urban area zonings that enable redevelopment at higher densities (45%) or in undeveloped greenfield areas (36%).

We note that in terms of planning for further development, that concepts such as the 10-minute neighbourhood can be worked into both greenfield and intensification proposals.

We accept officers' position that no changes are recommended in response to this submission point.

Explore 'value capture' and make this a requirement in the plan.

Hearing Panel discussion and recommendation:

Officers noted this point. The said that Value Capture can be explored as part of a range of related business cases.

We accept the officers' position that no changes are recommended in response to this submission point

Our Space needs to take account of sea level rise.

Hearing Panel discussion and recommendation: Mr De Lu urged the Panel to consider future generations that have not yet been born, and raised concerns in relation to those areas subject to sea level rise. Spokes Canterbury considers that planning should be undertaken with a 100 year timeframe in mind and plan for sea level rise. In response to questions from the Panel, he said that provision should be made for managed retreat for sea-level rise.

Officers referred to their comments and recommendations outlined in Section 4 in relation to Theme 11 (Addressing climate change and achieving sustainability and zero carbon goals). Officers said that the proposed direction of Our Space are guided by the vision, principles and strategic goals in the Urban Development Strategy, especially in terms of the 'integrated and managed urban development' theme. This involves planning for risks from natural and other hazards, including those related to sea level rise and climate change. The Urban Development Strategy approach to addressing broader sustainability objectives could be referenced through additional wording in Section 4 and 5 of Our Space. They also noted that climate change, and in particular sea level rise, is an integral part of the work undertaken by district councils related to coastal and river flooding issues.

We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and

amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

Concern that much of the land for greenfield development is agricultural.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (Protecting productive/agricultural/high quality soils from urban expansion). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position that no changes are recommended in response to this submission point.

#### One Voice Te Reo Kotahi (OVTRK) Organising Group (042)

Supports the submission from Sustainable Ōtautahi Christchurch.

Hearing Panel discussion and recommendation:

We refer to our recommendations in relation to the submission of Sustainable Ōtautahi Christchurch (#37).

Suggests the role of Third Sector Organisations as collaborative partners should be explicit in the document.

Hearing Panel discussion and recommendation:

Officers consider that the role of Third Sector Organisations as collaborative partners could be referred to more explicitly in Our Space. They recommend adding a reference to third sector organisations in the second para of section 6.3 beginning "Although the implementation...".

We accept the officers' position on this and recommend that it is amended accordingly.

#### Red Spur Limited (043)

Landowner seeks inclusion of additional land (outside the PIB) on Kennedys Bush Road, Christchurch.

Hearing Panel discussion and recommendation:

We accept the officers' evidence in the hearing report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas for inclusion should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended in response to this submission point.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report.</p> <p>We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>5</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers said that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites (such as the example given in the submission) that may not presently be practical, economic or feasible to develop.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended in response to this submission point.</p>
Proposes that Figure 16 should be included in District Plans rather than the CRPS.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended in response to this submission point.</p>
Suggests that streamlined RMA processes be used to rezone the submitter's land.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.</p> <p>No changes are recommended in response to this submission point.</p>

Simon Britten (044)

<sup>5</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

Seeks investment in active transport and public transport.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport). They noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.</p> <p>We accept the officers' position, and no changes are recommended in response to this submission point.</p>
Need for a more supportive approach to creative affordable housing solutions with current rules a barrier.
<p>Officers' comment:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types). They noted that Our Space does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have some planning provisions in this regard and can consider this further through subsequent district plan reviews and changes. They noted the comment regarding rule provisions in the Christchurch District Plan outside this process.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>

#### Tony Dale (045)

Predictions to 2048 are probably wrong.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report. They noted that In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.</p> <p>They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term. It is in the apportionment by territorial authority that Our Space differs from current projections.</p> <p>We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>
Highly productive agricultural land should not be wasted.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (Protecting productive/agricultural/high quality soils from urban expansion). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position that no changes are recommended in response to this submission point.

Intensification north of Riccarton is occurring but need ways to encourage central city population rather than around suburban centres.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the Central City). They said that the Capacity Assessment confirms that the existing provisions of the Christchurch District Plan are sufficient to accommodate such demand and that the Christchurch District Plan's zones and associated rules allow for a range of densities and housing types appropriate to their location (Central City, inner suburbs or outer suburbs).

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

They also observed that Christchurch City has many examples of high quality residential intensification. However, it is recognised that there are examples of poor outcomes resulting from past intensification, including poor urban design, amenity impacts (noise, car parking, etc) and reduced social cohesion. The reasons that lie behind this matter and the potential solutions that can ensure future higher quality intensification are many and varied and are best dealt with at a territorial authority level. It is also noted that improving intensification outcomes is currently a priority for the Government as it develops a new National Policy Statement on Quality Intensification.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Social and affordable housing could revitalise the city centre.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to theme 9 (Provision of social and affordable housing, and a range of housing types) in the officers report.

The submitters point is noted.

No changes are recommended in response to this submission point.

Commercial activity should be directed towards the city centre rather than suburban centres.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation. No changes are recommended in response to this submission point.

Supports reversion of converted industrial premises in eastern Christchurch back to industrial use.

Hearing Panel discussion and recommendation:

Officers noted this, however considered this is outside the scope of Our Space.

We accept the officers' recommendation on this. No changes are recommended in response to this submission point.

#### Don Babe (046)

Encourage more of the growth within the Central City.

Hearing Panel discussion and recommendation:

We heard from Mr Don Babe in relation to his submission.

He considered there is too much emphasis on housing away from the central city in Selwyn and Waimakariri Districts. A big issue was climate change, in particular issues with carbon as a result of transport, and a key way to address this is through density. He showed us a presentation that included a graph showing carbon created per person, compared to urban density. He considered that a vibrant central city was needed, and for this it needed more people in it. A concentrated central city would have benefits such as agglomeration effects, but also social benefits as well. He considered that if people had a 20 minute bus ride, or a 10 minute walk from work to home, then this would have benefits.

Mr Babe also showed us costs of infrastructure costs from Halifax in Canada, that suburban costs approximately \$3000 per year to service infrastructure, compared to \$1000 per year for urban development. He admitted there were differences in what was funded, but even if the savings were half of what they were in Canada, there would still be significant savings. Mr Babe concluded that more housing needs to be met in the central city, rather than Rolleston or Rangiora.

In response to questions from the Panel, Mr Babe said that there was a significant amount of land in the central centre that could be upgraded, such as the area between Fitzgerald and Barbadoes Street. He noted sites that are land banked, and financial incentives need to be made so that land is developed. He said that while 70% of people live and work in Rangiora, there are another 30% that don't and they commute. He also said that people are changing in terms of their preferences, and migrants are used to much different densities.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the projections.

They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We note the principle behind the submission, and to that extent we accept it. However, no changes are proposed to Our Space in response to the submission point.

Less caveats on new development and development levy discounts for affordable housing.

Hearing Panel discussion and recommendation:

Officers noted this, however considered this is outside the scope of Our Space.

We accept the officers' recommendation. No changes are recommended in response to this submission point.

2013 Census biased due to EQ work so cannot be relied upon.

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). They note that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances.

We accept that there is uncertainty in the projections. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood.

We are satisfied that no changes are recommended in relation to this submission point.

Considers BAU approach needs to be tested in light of changes since the original strategy.

Hearing Panel discussion and recommendation:

Officers noted the comments, and that the proposals set out in Our Space are strongly guided by the vision and strategic goals from the Urban Development Strategy and the extensive planning framework that has already been developed for Greater Christchurch to support long term growth. They noted it focuses on

responding to key growth issues for Greater Christchurch identified in Section 4 of Our Space. Section 6 recognises additional work is required to ensure the planning directions for the longer term are appropriately investigated and implemented and effectively respond to emerging drivers of change for Greater Christchurch.

We accept the Officers' recommendation. No changes are recommended in response to this submission point.

Does not fix the problems that remain or halt urban sprawl, better resolved through a common % increase in each area, meaning targets of 70k in Christchurch, 9k in Waimakariri and 7.6k in Selwyn.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 1 (Accuracy and uncertainties of projected demands) and 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officer reports. They note that Our Space allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term. It is in the apportionment by territorial authority that Our Space differs from current projections.

We accept the officers' recommendation. No changes are recommended in response to this submission point.

Most jobs in the central city impact travel and transport infrastructure from outlying areas.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport) in the officers' report.

This point is acknowledged.

No changes are recommended in response to this submission point.

Transport, infrastructure, social, health and business agglomeration benefits of more housing in the city.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts).

This point is acknowledged.

No changes are recommended in response to this submission point.

Carrot and stick approach needed to encourage more development in the city.

Hearing Panel discussion and recommendation:

This point is acknowledged.

No changes are recommended in response to this submission point.

#### Foddercube Products Limited (047)

Landowner seeks inclusion of additional land (outside PIB) on Springs Road on Christchurch Selwyn boundary. Some land is adjacent to the CSM2 and more appropriate for industrial use.

Hearing Panel discussion and recommendation:

We heard and considered the evidence provided by Ms Fiona Aston (Planner) and Mr Jeremy Speight (Bayleys Commercial and Industrial sales and leasing) on behalf of their client, Foddercube Products Limited. The land itself covers approximately 20 hectares and is located outside of the projected infrastructure boundary on the corner of Springs Road and Marshs Rd in South Hornby, adjoining existing industrial general zoned land.

Following questions from the Panel about the impact of the proposed development on rural amenity, Ms Aston did not consider the area to be critical as a buffer and considered it as a logical infill of industrial land.

Mr Speight identified that industrial land in Christchurch was held by a few owners, with a lack of supply of bare land, given that a lot of industrial land had been developed using 'design build sale' or 'design build lease' models, rather than sale of bare land. No proposal was put forward as to how this would be addressed for the subject land, nor that its ownership would necessarily be retained.

Officers' position is that the best time for consideration of what the future use of the land will be is as part of the full review of the Canterbury Regional Policy Statement in 2022. Generally, officers consider that given the over-supply of industrial land that provision of further industrial land as part of a future development area is not appropriate at this stage.

We do not consider that expansion of the future development area for industrial land to incorporate the submitters land to be appropriate. In this respect, we accept the recommendations of staff as set out in Section 4 Theme 4 of the officers' report. However, we do recommend amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No changes are recommended in response to this submission point.

We address the matter of flexibility around the provisions of the Canterbury Regional Policy Statement below.

Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology.

Hearing Panel discussion and recommendation:

We refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands).

While the submitter provided further information as to the nature of design build sale and lease forms of industrial land supply, no recommendations were made as to how this should be addressed in the methodology, or how the submitters land would supply a different market. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the business land capacity and feasibility work done by Greater Christchurch to be an example of 'best practice'.<sup>6</sup>

We are satisfied with the officers' position that no changes are required, noting that further refinement of the methodology may be undertaken as part of future capacity assessments as part of continual improvement.

No changes are recommended in response to this submission point.

<sup>6</sup> Page 18 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

Hearing Panel discussion and recommendation:

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop.

No changes are recommended in response to this submission point.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

Hearing Panel discussion and recommendation:

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.

No changes are recommended in response to this submission point.

Suggests that streamlined RMA processes be used to rezone the submitter's land.

Hearing Panel discussion and recommendation:

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.

No changes are recommended in response to this submission point.

#### Olly Powell (048)

Questions need for growth and considers city to already be a good size and growth would impact this.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts).

They noted that the NPS-UDC requires the local authorities in Greater Christchurch to ensure there is sufficient development capacity to support projected population growth. This is explained in section 1 of Our Space. Further, Our Space does not propose any additional greenfield future development areas for Christchurch City (beyond those already identified in the Canterbury Regional Policy Statement and the Christchurch District Plan); therefore in this respect the city's urban boundary is not increasing in size, growth will be accommodated within existing areas of Christchurch City (primarily through intensification).

We accept the officers' recommendation. No changes are recommended in response to this submission point.

#### Transpower New Zealand Ltd (049)

Impact on National Grid and giving effect to NPSET unclear, appropriate buffer from critical infrastructure.

Hearing Panel discussion and recommendation:

Officers noted that the assessment of capacity of greenfield priority areas took account of Outline Development Plans, which show powerlines that are a constraint on development. For redevelopment in Christchurch City, the District Plan zones with the higher potential for redevelopment largely avoid powerlines. They noted that relatively small areas of Residential Suburban and Residential Hills zoned land are affected, however, the overall impact is considered to be minimal in the overall assessment of capacity. Officers therefore consider the requirements of Policy PB3(a) of the NPS-UDC have been met.

Officers do not consider it necessary to identify the location of National Grid transmission lines and substations on the maps in Our Space. This is consistent with the approach to (not identifying) telecommunications, water supply, wastewater or stormwater infrastructure networks or social infrastructure.

We accept the officers' recommendation. No changes are recommended in response to this submission point.

#### Grant Poultney (050)

Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.

Hearing Panel discussion and recommendation:

We heard from Ms Jo Appleyard, counsel for Mrs Sue and Mr Grant Poultney. Ms Appleyard described previous mapping errors in relation to the Poultney's property at 353 Worsleys Road made in 1995, have subsequently informed district plan reviews and the development of Map A in the CRPS. Mr Poultney has engaged numerous times with the CCC for the error to be corrected. Mr Poultney submitted on the Christchurch District Plan, however the Independent Hearing Panel was unable to make the changes requested.

Mr Poultney is concerned about being deferred to later resource management processes, which has happened in the past, and seeks the ability to place two dwellings on the flat part of the property. Our Space is an important document for the CRPS review and will have significant implications. Ms Appleyard noted that the CCC's technical advice supported the inclusion of Mr Poultney's land. She highlighted that the officers' report does not recommend any changes to Our Space to recognise the Poultney's land.

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report.

They said that the points made in the submission relating to an alleged historical error in the zoning of this property are noted. However, officers consider that the merits of any amendments required to Map A to address this are more appropriately considered through an RMA process.

We agree with the Officers' position. However, we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

#### Suburban Estates Ltd, Sovereign Palms Ltd and Doncaster Developments (051)

Considers the approach does not meet market demand or lifestyle preferences of development in the districts and that the NPS-UDC does not support the directive or coercive approach to the provision of feasible development capacity. Identifies risk that NPS-UDC policies will not be given effect to.

Hearing Panel discussion and recommendation:

We heard legal submissions from Ms Pru Steven, counsel for the submitter and evidence from Mr Adam Thompson (economics) Mr Kim Sanders (company engineer for Suburban Estates), Mr Bruce Thompson, (planning consultant), and Mr Regan Smith (engineer) for Suburban Estates Limited.

Ms Steven described the 'long term' in the NPS-UDC as that applying to the next 20-30years. She invited the Panel to consider whether the land identified in Our Space is sufficient. She submitted that Our Space must

also balance certainty with the need to be responsible to demand for such development. She said there is a clear current demand for development in Selwyn and Waimakariri at a density that is lower than that in the Christchurch City.

Ms Steven submitted to us that Our Space fails to give effect to Policy PA3 of the NPS-UDC as it is not sufficiently responsive to the type or the market of housing in Waimakariri and Selwyn Districts. Ms Steven adopted the submissions of Mr Fuller in this respect where he referred to the requirement for housing choices that meet the needs of the people. Ms Steven also challenged the “allocative approach” evident in Our Space, being the percentage of growth allocated to the districts (Selwyn and Waimakariri) relative to that provided for within Christchurch City, which she submitted was too directive and lacking in support from the NPS-UDC provisions.

In relation to table 3 of Our Space, Mr Thompson noted the shortfalls for Waimakariri over the medium and long term. He took us through the shortfalls in the Market Economics report undertaken by Waimakariri District Council, which also showed a shortfall in the medium to long term. Mr Thompson said that meeting demand meant having a range of housing types. In terms of the proposed development in west Rangiora, he said he had reviewed the Rangiora market and considered there was insufficient greenfield priority land, and he considered there was no infill development that was feasible. The submitter’s proposal would add 96 lots to the market in north west Rangiora. He considered more developers in the market would provide more competitive pricing. In relation to Kaiapoi, he said that there was approximately 1 year of greenfield land left, and only sufficient land out to 2021.

In response to questions from the Panel, Mr Thompson conceded that you could think about Greater Christchurch as a whole market, but he would recommend that ensuring that Waimakariri and Selwyn can meet their housing targets is an important piece of the puzzle, should Christchurch not be able to deliver on its targets. Mr Thompson said that event with including the land put forward by the submitter, there would still be a shortfall.

Officers noted that Our Space is guided by the vision, principles and strategic goals of the Urban Development Strategy, which were developed after extensive consultation and represent the collective aspirations and preferences of people in Greater Christchurch. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of ‘integrated and managed urban development’ for the purposes of this document.

Officers consider the approach is consistent with the NPS-UDC and associated guidance. Policy PC9 of the NPS-UDC provides that territorial authorities shall set minimum targets in accordance with the Capacity Assessment under Policy PB1, and with Policies PA1, PC1 or PC2, and PD3. Policy PD3 states that local authorities that share jurisdiction over an urban area are strongly encouraged to collaborate and cooperate to agree upon the specification of the minimum targets required under PC5 and PC9 and their review under policies PC6, PC7 and PC10. This indicates that local authorities have discretion to agree upon a territorial authority target that is different from the Capacity Assessment, provided that the aggregated targets are not less than the regional minimum target, and that other requirements of the NPS-UDC are met. They also said that as required by the NPS-UDC, market indicators will be monitored on a frequent basis and the housing and business development capacity assessment will be updated every three years. This will ensure an up to date base of information is available and enable spatial planning decisions to be responsive to changing population and household projections as well as changes in market conditions and other relevant factors. The housing and business development capacity assessments will provide a clear evidential basis for understanding the amount of feasible development capacity that has been enabled and what additional capacity is required in different locations.

We disagree that Policy PA3 should be read in the manner suggested by the submitter. We must provide for the social, cultural, and environmental wellbeing of people and communities, but in doing so, we have particular regard to those matters set out in PA3(a)-(c). It does not require that we meet demand in micro-markets in all locations. If that were the case, we would be directing intensification to all high demand areas, such as more expensive suburbs within the city.

This is where the evidence of Mr Adam Thompson was incorrectly focussed at a local level. We note that Mr Thompson's assessments were narrow, based solely on supply within specific townships. We take a broader, and more strategic view, and consider that it is appropriate to look wider across all of Greater Christchurch. To that extent, it is only the officers who have provided an analysis of the entire area.

We are satisfied with the officers' recommendations and reasons in this respect. We accept the officers' recommendation on this matter, and no changes are recommended in response to this submission point.

Seeks that the Projected Infrastructure Boundary / Urban Limit lines be removed from the update, the CRPS and other planning documents.

Ms Steven accepted that changes would be required to Map A in the CRPS, but that recommendations could be made in our Space for changes to the CRPS.

Officers said that Map A was inserted into the Canterbury Regional Policy Statement through the Land Use Recovery Plan, having previously been included in Plan Change 1 to the Canterbury Regional Policy Statement. They said that the projected infrastructure boundary gives infrastructure providers certainty around where growth will be focused, for forward planning and infrastructure planning purposes. Officers consider this remains an appropriate mechanism to ensure the strategic integration of infrastructure with urban activities and the attainment of the intensification and consolidation objectives of Chapter 6 in the Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the merits of such a policy change is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

While that may be a matter that could be considered through the Canterbury Regional Policy Statement review, we consider that there are strong reasons for containment of urban activities in order to achieve the vision and principles of the Urban Development Strategy. We received many submissions concerned with the effects of more greenfield development. We are satisfied at this time that sufficient feasible development capacity can be provided within this framework and that the ongoing monitoring and review required by the NPS-UDC and signalled in the schedule of further work in Section 6.2 balances the certainty regarding the provision of future urban development with the need to be responsive to demand for such development as required by Policy PC13(b) of the NPS-UDC.

We accept the officers' recommendation and no changes are recommended in response to this submission point.

Seeks inclusion of additional land (outside the PIB) in north-west Rangiora and south-west Prebbleton.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report.

Mr Smith presented to us in relation to ground conditions, wastewater, the ability to service the site with minimal upgrades.

Mr Bruce Thompson also described the land in west Rangiora. He said that except for its identification outside the projected infrastructure boundary, he was not aware of any reason for it not to be developed. The point made in the submission and Mr Bruce Thompson's evidence relating to an alleged historical error in the zoning of the northwest Rangiora land is noted. However, given its use for rural residential purposes, which is what the Residential 4a and 4b zones are, it is difficult to understand what the error is.

Officers consider that the merits of any amendments required to Map A to address this are more appropriately considered through an RMA process.

We accept the officers' recommendation on this matter, and recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of

Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Expresses concern that the approach in Our Space is too directive, and that the 'deferred status' should be removed from land identified for development and a move to higher densities of housing be supported and facilitated but not required or directed through statutory plans.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) and 6 (Sequencing and staging of greenfield land). They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas.

We continue to support the use of minimum densities. Submissions in relation to those can be considered as part of the review to the Canterbury Regional Policy Statement in 2022.

We accept the officers' recommendation and no changes are recommended in response to this submission point.

Seeks that the future development area identified in Kaiapoi is a Greenfield Priority Area.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (Sequencing and staging of greenfield land) in the officers' report.

Mr Kim Sanders presented evidence to us and said that there were people that wanted to build in Kaiapoi, but there was no land left. He said that restricting supply had an impact on price.

Officers addressed this matter in their Reply Report and explained the reasons why proposed future development areas are included in Our Space rather than greenfield priority areas. We agree with the response provided by Officers.

No changes are recommended in response to this submission point.

Areas of Christchurch existing zoned land to remain undeveloped due to geotechnical remediation costs.

Hearing Panel discussion and recommendation:

No evidence has been provided to support this submission point. A number of greenfield areas have been economically remediated and bought up to TC2 equivalent. Assessment and allowances for site conditions are as set-out in the Harrison Grierson report: "Development Feasibility Assessment – Greenfields". For the assessment of redevelopment feasibility in Christchurch City, the foundation cost assumption was adjusted to reflect the Technical Category of each tested development site.

Notwithstanding that, monitoring will determine whether shortfalls in planned development exist. This can feed into future capacity assessment noting uptake.

No changes are recommended in response to this submission point.

## Woolworths New Zealand Limited (052)

Landowner seeks inclusion of additional land (outside the PIB) cnr of Marshlands/Prestons Road, Christchurch.

Hearing Panel discussion and recommendation:

We heard and considered the evidence of Mr Dean Chrystal, planner, on behalf of Woolworths New Zealand Limited. Mr Chrystal is concerned that the Our Space document will form an extremely strong direction through later RMA processes such as the review of the Canterbury Regional Policy Statement. He noted that in relation to those processes, it is his view that the proposed extension will most certainly be declined as it is not consistent with Our Space, and then it would become a circular argument. He told us he was concerned that in relation to Woolworth's submission, that officers had recommended that there was sufficient inner city industrial land available to transition to commercial use to meet the cities long term needs. He noted that the central city was a completely different market to that land at Prestons. He did not consider that there were 'other methods' available to locate a supermarket, as they have specific land needs (approximately 2 hectares for carparking etc.). He did not consider that a supermarket would have distributional effects on surrounding key activity centres or the central city.

In relation to the second part of the submission, Mr Chrystal noted that the submission sought a review of identified commercial areas as part of the comprehensive Canterbury Regional Policy Statement review. Consideration needs to be given as to where projected commercial growth will occur, whether existing identified but undeveloped commercial activity remains appropriately zoned, and whether the hierarchy of centres remains appropriate. He said that the difficulty with the Capacity Assessment is that it has not been ground truthed and has been a desktop analysis.

The officers' position on the submission is that at present, sufficient capacity is identified to meet short term needs in the north, and also notes that shortfalls in the long term will be met through transitioning of industrial land in the inner city over time. We understand that this was not to say that Woolworths should be setting up further supermarkets in the central city; rather that the wider business market could be catered for in the long term through the conversion of industrial land.

Mr Chrystal was not able to provide any information on the need for local shopping services, nor any updated traffic information in support of identification of the land for commercial use. This will be impacted by changes from the Northern Arterial route currently under construction. We accept that there may be difficulties with provision of residential activities on commercial zoned land, but at the same time consider that changes to the urban area need to be supported by wider analysis of business development in the north. We accept the officers' position that opportunity needs to be provided for development of the Key Activity Centre at Northwood/Belfast, and that the proper opportunity to address this further is as part of the future review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended in response to this submission point.

Land has opportunities for commercial and residential development.

Hearing Panel discussion and recommendation:

Officers noted this matter. We refer to our reasons set out above.

No changes are recommended in response to this submission point.

### Cockburn Family Trust (053)

Landowner seeks inclusion of land (inside the PIB) for industrial use at Hoskyns Road, Rolleston. Land, adjacent to I-Zone, is within PIB but not identified as a Greenfield Priority Business area in the CRPS.

Hearing Panel discussion and recommendation:

We heard from Mr Dean Chrystal, planner (who also presented in relation to the statement of evidence from Mr Beresford regarding industrial real estate matters) in relation to the submitter's 49.2 hectare block of land at Rolleston, which is inside the Projected Infrastructure Boundary, but is not identified as a Future Development Area or Greenfield Priority Area.

Mr Chrystal talked to us about matters that are similar to those for Rolleston Industrial Holdings (refer submission 073). That included land that was able to be purchased as vacant land, and the importance of access to the rail network. He also highlighted what he considered to be discrepancies with identification of vacant land, which he did not consider properly reflected vacant business land.

We didn't hear any evidence regarding the makeup of business located next to rail sidings or with access to the rail network, nor whether specific land was being set aside for those business that require rail transport modes. Better understanding is required as to the demand for this type of development with access to the rail network, and the potential impact that releasing more industrial land will have on the viability of existing centres. As such, we consider the Greater Christchurch Partnership should look to refine its methodology for industrial business land by considering, as part of future capacity assessments, the impact of modal shift (from road to rail) on demand. We consider that this is important in respect of Objective 5.2.1 and 6.2.1. and 6.2.4. of the Canterbury Regional Policy Statement regarding integrating land use and infrastructure under.

It appeared to us that the identification of the land as a future development area (or not) was a matter of timing. As we mention above, further work may also need to be done around particular industrial activities with locational needs such as the rail network (including consideration of areas served by rail elsewhere in the city).

We note that the land has specific infrastructure requirements associated with the rail network. We also note that an over-supply of specific types of industrial land should not be compared in the same way as an oversupply of residentially zoned land, which has the potential to impact on residential intensification objectives and targets in the central city and key activity centres, although they may have an impact on maintaining a compact urban form. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

We accept in part the submitter's request, to the extent of our recommendations for Environment Canterbury to engage with the landowner and for the local authorities to consider the relationship of transport modes to demand in specific locations as part of future capacity assessments.

#### Grassmere Residents (054)

Should develop land in the City first to create density and vibrancy.

Hearing Panel discussion and recommendation:

Ms Ngaire Button, Mr Ryan Geddes, Mr Stuart Mitchell, Mr John Button and Mrs Ann and Mr Mike Toth appeared on behalf of the Grassmere Residents.

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts).

We accept that it is appropriate that both greenfield development and infill should take place contemporaneously.

No changes are recommended in response to this submission point.

Take care not to build on land suited for growing food.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (Protecting productive/agricultural/high quality soils from urban expansion). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position that no changes are recommended in response to this submission point.

Partner with Government to help finance affordable housing.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to theme 9 (Provision of social and affordable housing and a range of housing types), and reporting officers' reply report (question 8). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in Our Space.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

More extensive use of development contributions to build infrastructure.

Hearing Panel discussion and recommendation:

Officers noted the comment, but considered that this submission point falls outside the scope of Our Space.

We do, however, encourage the submitter to make submissions on the Annual Plan. In addition, we recommend that Christchurch City Council consider whether there are any options or alternatives available to facilitate, fund or enable infrastructure development at Cranford Basin, that was the subject of the Cranford Basin Regeneration Plan.

## Hughes Developments Limited (055)

Provision of additional greenfield land in Rolleston is essential.

Hearing Panel discussion and recommendation:

We heard from Mr Mark Brown, a planner, and Mr Jake Hughes for Hughes Developments Limited. Mr Brown described the land development of Hughes Developments Limited, including Faringdon in Rolleston. He described how addition of Faringdon South wasn't successful through the Land Use Recovery Plan, but was later added as a Special Housing Area. The submitter supports the identification of actions to address medium term shortfalls in Rolleston, however they consider that there is uncertainty around demand and capacity identified in the capacity assessment. Mr Brown described how the minimum densities are not supported at 15 households per hectare, nor do they support maximum caps as a means of sequencing.

Officers said that Our Space proposes that some new greenfield housing areas should be released in Rolleston to help address projected housing capacity shortfalls for Selwyn over the medium to long term (Section 5 of Our Space).

No changes are recommended in response to this submission point.

Current supply levels identified in the capacity assessments potentially do not reflect what is actually happening.

Officers' comment:

In response to questions from the Panel, Mr Brown considered that the capacity assessment was highly driven by score analysis, and that analysis about how things look on the ground should be undertaken. He also noted the lag of land being identified, through to houses getting on the land. In relation to land at Rolleston, he did not think that growth and uptake was being accurately portrayed. In terms of their yield to date, yield was around 12-13 households per hectare. He said that demand for different densities had varied, and they responded accordingly. In relation to responding to demand, Mr Brown noted that they responded to this by looking at sales, then adjusting subdivisions that are underway. He noted they were moving away from the more intense super lot development.

Officers noted that the capacity assessment will be reviewed every 3 years and can be updated to reflect recent developments and changes in terms of the provision of infrastructure.

We accept the officers' position and note that future capacity assessments will provide for a responsive planning framework in relation to any action undertaken. No changes are recommended in response to this submission point.

Graeme Alan and Joy Yvonne McVicar (056)

Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.

Hearing Panel discussion and recommendation:

We accept the officers' response in Section 4 Theme 4 in the Officers Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

Officers consider that the appropriate consideration of further areas for inclusion should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended in response to this submission point.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report.

We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater

<p>Christchurch to be an example of 'best practice'.<sup>7</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers said that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites (such as the example given in the submission) that may not presently be practical, economic or feasible to develop.</p> <p>We accept the officers' position and no changes are recommended in response to this submission point.</p>
<p>Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Proposes that Figure 16 should be included in District Plans rather than the CRPS.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended in response to this submission point.</p>
<p>Suggests that streamlined RMA processes be used to rezone the submitter's land.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.</p> <p>No changes are recommended in response to this submission point.</p>

B. Welsh, S. McArthur, T. Kain (057)

<p>Landowner seeks inclusion of additional land (outside the PIB) in NW Belfast, Christchurch.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' evidence in the hearing report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed previously, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.</p>

<sup>7</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended in response to this submission point.

#### Canterbury District Health Board (058)

Need to ensure greenfield development enables easy access to core amenities, nearby public services and employment opportunities.

Hearing Panel discussion and recommendation:

We heard from Dr Anna Stevenson in relation to the CDHB submission. Dr Stevenson noted that in general, Our Space is supported, but that the CDHB considered that there were some areas that required some more emphasis. She considered more needed to be included about intergenerational equity, and that uncertainty is recognised. This provides the ability to be able to monitor and respond to change. She considered there needed to be more emphasis on the challenges associated with aging, as well as other wellbeing impacts. In addition, Dr Stevenson considered that the impact of greenfield development was more nuanced than just dealing with congestion. Dr Stevenson noted issues with affordability now and into the future, and the need to address this through better refined actions. She also highlighted the importance of the protection of drinking water, and sought greater emphasis on climate change. The CDHB supported the 10-minute neighbourhood concept and the way this tied into the key activity centre approach. She said that the CDHB strongly supports the relationships between partners to ensure the ability to move forward together, and to enable the Partnership to be responsive.

Subsequently, at the Panel's request, Dr Stevenson provided us with some recommended wording in relation to Our Space, which officers commented on and responded to.

We accept the officers' recommendations for the reasons set out in their response.

Supports 10 minute community diagram but notes not specifically identified for implementation.

Hearing Panel discussion and recommendation:

We accept the officers' recommendations for the reasons set out in their response.

Supports a range of housing types and housing being close to existing centres; housing should be good quality, affordable, accessible and in a location that builds community; encourage universal design principles to ensure homes are suitable for all ages and stages.

Hearing Panel discussion and recommendation:

We accept the officers' recommendations for the reasons set out in their response.

Supports the focus of commercial development around existing centres and encourages a focus on employment opportunities for people who live in the area and placement of public services within these areas.

Hearing Panel discussion and recommendation:

We accept the officers' recommendations for the reasons set out in their response.

Evidence provided by capacity assessment should be supplemented by information from communities on what they want and need.

Hearing Panel discussion and recommendation:

We accept the officers' recommendations for the reasons set out in their response.
Considers densities around key centres to be key to the success of Our Space.
Hearing Panel discussion and recommendation: We accept the officers' recommendations for the reasons set out in their response.
Suggests the document makes a clear statement as to the importance of building strong, connected neighbourhoods using the 10 minute neighbourhood as an example.
Hearing Panel discussion and recommendation: Refer to the above.
Notes that specific populations may require additional resourcing for active and public transport infrastructure e.g. Eastern areas of Christchurch.
Hearing Panel discussion and recommendation: We accept the officers' recommendations for the reasons set out in their response.
Encourages infrastructure planning to be clearly articulated in Our Space including how other plans or strategies might contribute e.g. linking into community knowledge, signalling spaces and places for park and ride options so these can exist around existing infrastructure.
Hearing Panel discussion and recommendation: We accept the officers' recommendations for the reasons set out in their response.
Considers Our Space does not deal strongly with natural capacity and resource sustainability, and suggests there could be stronger links to zero carbon plans.
Hearing Panel discussion and recommendation: We accept the officers' recommendations for the reasons set out in their response.

#### Ernst Frei (059)

Landowner seeks inclusion of additional land (outside the PIB) on Cashmere Road, Christchurch.
Hearing Panel discussion and recommendation: Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).  Mr Frei owns land at 564 Cashmere Road. Part of the site is zoned New Neighbourhood in the Christchurch District Plan. Mr Frei seeks further development of the site. Mr Frei emphasised that the addition to the existing zoned area would amount to approximately two rows of houses which he considered very small. Mr Fox told us that it was not economically viable to undertake the development of just 25 lots, and that it needed to get to the 50 lots to be economically viable. The land sought to be rezoned lies within the Henderson Basin ponding area. Ms Aston explained how compensatory storage can be formed to overcome this.  The officers' report did not agree to adding further future development areas, on the basis that sufficient capacity is provided for in the existing Christchurch district plan area. However, a report prepared by the

<p>Christchurch City Council<sup>8</sup> did consider that there was merit in considering three additional areas on the basis that these landholdings are:</p> <ul style="list-style-type: none"> <li>• Small-scale;</li> <li>• Have no servicing constraints;</li> <li>• Are considered feasible to develop by the landowners; and</li> <li>• Support urban consolidation (and other key objectives) of the Canterbury Regional Policy Statement</li> </ul> <p>We did not have the opportunity to test the authors on those criteria, as they did not appear as witnesses. Christchurch City Council has indicated that it does support considering the three areas by way of changing the Canterbury Regional Policy Statement.</p> <p>Having considered the information filed with us by the Christchurch City Council, the officers' report, and the evidence of Ms Aston and Mr Fox, and we consider that this land should be investigated further as part of the full review of the Canterbury Regional Policy Statement in 2022.</p> <p>We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.</p>
<p>Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>No recommendations were made by the submitter as to how this should be addressed in the housing capacity methodology. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>9</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Proposes that Figure 16 should be included in District Plans rather than the CRPS.</p>

<sup>8</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

<sup>9</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Suggests that streamlined RMA processes be used to rezone the submitter's land.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.</p> <p>No changes are recommended in response to this submission point.</p>

### GFR Rhodes Estate & Larson Group (060)

<p>Landowner seeks inclusion of additional land (outside the PIB) in Prebbleton.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We heard from Mr Peter Fuller, counsel for the submitter, Mr Adam Thompson, an economist, and Ms Fiona Aston, a planner for GFR Rhodes Estate and Larson Group. Mr Fuller's legal submissions and Mr Thompson's economic evidence were based on the premise that growth had to be provided for in relation to all communities. We refer to our assessment in relation to submission 51.</p> <p>We accept the officers' position set out in Section 4 Theme 4. Of the Officers' Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.</p> <p>We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.</p> <p>No further changes are recommended in response to this submission point.</p>
<p>Propose zoning for smaller more affordable sections based on Urban Economics assessment of Prebbleton.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We refer to the evaluation above and accept that officers' report discussion set out in Section 4, Theme 4. No changes are recommended in response to this submission point.</p>
<p>Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report.</p> <p>We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>10</sup> The report recognises that more could be done regarding</p>

<sup>10</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

<p>setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Proposes that Figure 16 should be included in District Plans rather than the CRPS.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended in response to this submission point.</p>
<p>Suggests that streamlined RMA processes be used to rezone the submitter's land.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.</p> <p>No changes are recommended in response to this submission point.</p>

#### Martin Pinkham (061)

<p>Sees a lack of long term planning in Waimakariri and a need for standalone infrastructure authorities.</p>
<p>Mr Pinkham appeared before us and presented his submission. He spoke to us about the lack of integration of transport infrastructure and land use in the Greater Christchurch area. He said that Christchurch had sat on its hands and not created a credible case for transport funding. He considered the lack of development of a Council Controlled Organisation to manage transport had been a disaster. He said there was a major disconnect between transport planning and Our Space.</p> <p>Officers noted this submission point and said that Waimakariri Council does have a District Development Strategy and is working on structure planning for new residential areas in Rangiora and Kaiapoi and an update to the Rangiora Town Centre Strategy. Officers did not recommend any changes in response to the submission point.</p> <p>No changes are recommended in relation to this submission point.</p>
<p>Lower development contributions, more apartments, improved legislation to improve housing affordability.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing and a range of housing types) in the officers' report. We note that a social and affordable housing action plan is to be developed, which may address some of the submitters concerns. Matters such as development contributions are a matter for annual plan processes.</p>

No changes are recommended in response to this submission point.

#### Townsend Fields Limited (062)

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.

Officers noted supported.

No changes are recommended in response to this submission point.

Greenfield priority area should be rezoned ahead of identified future urban areas.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

#### Carolina Homes Limited (063)

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.

Officers noted supported.

No changes are recommended in response to this submission point.

Greenfield priority area should be rezoned ahead of identified future urban areas.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

#### Riccarton Bush Kilmarnock Residents Association (064)

<p>Considers future projections beyond 2030 based on data sets to be risky approach.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to comments and recommendation outlined in Section 4 in relation to theme 1 (Accuracy and uncertainties of projected demands) in the officers' report.</p> <p>They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>
<p>Intensification in existing areas ongoing, such as Riccarton, but no on-site parking causes problems, including health and safety issues.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the central city).</p> <p>We note that on-site parking is a matter for the district plan to consider.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Avoid large medium density communities due to potential social problems.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (Poor intensification outcomes and preferences to focus intensification in the Central City). They said that the Capacity Assessment confirms that the existing provisions of the Christchurch District Plan are sufficient to accommodate such demand and that the Plan's zones and associated rules allow for a range of densities and housing types appropriate to their location (Central City, inner suburbs or outer suburbs).</p> <p>Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.</p> <p>They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.</p> <p>They also observed that Christchurch City has many examples of high quality residential intensification. However, it is recognised that there are examples of poor outcomes resulting from past intensification, including poor urban design, amenity impacts (noise, car parking, etc) and reduced social cohesion. The reasons that lie behind this matter and the potential solutions that can ensure future higher quality intensification are many and varied and are best dealt with at a territorial authority level. It is also noted that this improving intensification outcomes is currently a priority for the Government as it develops a new National Policy Statement on Quality Intensification.</p>

We adopt the officers' recommendations and do not recommend any changes in response to this submission point.
Disagree with one-size-fits-all approach to greater living densities around key centres.
Hearing Panel discussion and recommendation: We refer to the submission point above in relation to Section 4, Theme 7 of the officers' report. No changes are recommended in response to this submission point.
Difficult and expensive to impose a comprehensive new public transport system with low current patronage.
Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (Transport needs and implications, including for public and active transport). They noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.  We adopt the officers' recommendations and do not recommend any changes in response to this submission point.
Still a reliance on cars and plans should be more pragmatic and realistic.
Hearing Panel discussion and recommendation: We refer to the submission point above in respect of Section 4, Theme 6. No changes are recommended in response to this submission point.

#### Scarborough Hill Properties Ltd and Directors/Shareholders Ruth Kendall & Ewan Carr (065)

Landowner seeks inclusion of additional land (outside the PIB) in Scarborough, Christchurch.
Hearing Panel discussion and recommendation: Ms Juliette Derry, counsel for the submitters, and Mr Ewan Carr, director, presented the submission for Scarborough Hill Properties. Part of the submitters site lies within the Residential Port Hills zone, while part is zoned Rural Port Hills. The submission seeks that the Our Space strategy does not preclude the inclusion of additional land outside of the urban boundary. Mr Carr discussed his vision for the block. Mr Carr described the property, being the residual area of the original farm, which included fire access. He considers that residential use on the site (such as high-end larger lots with revegetation) is a relatively natural progression for the urban edge and should not be constrained, and the site is already connected to services which run from Godley Drive. At present the site has little economic use for running stock on the land, and caters for about 100 stock units, essentially running at a loss.  In response to questions from the Panel, Mr Carr described how in 1999, work done by Davis Ogilvie estimated a yield of approximately 200 sites from the development. He acknowledged there are issues with the road (Scarborough Road), but that Richmond Road had similar issues but was only one way, and yet approximately 150 additional sites were allowed. Mr Carr talked about the ability to merge with the hillside. He mentioned that there might be the opportunity to have a thoroughfare through the site for walking and pedestrian access up to Godley Head Road.  We accept the officers' recommendations set out in Section 4 Theme 4 of the Officers' Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.  No changes are recommended in response to this submission point.
Concern that uncertainties will mean identified development opportunities will not be realised.
Hearing Panel discussion and recommendation:

<p>Officers noted that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites that may not presently be feasible to develop.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>
Lacks flexibility to accommodate all needs and/or future market changes.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers noted that Our Space highlights how changing demographics and affordability will likely affect future housing demand in Greater Christchurch, with growing demand for smaller, more affordable housing. Section 6 highlights the key role of ongoing monitoring of household trends and further investigation of opportunities to encourage the provision and uptake of a range of housing types to meet future demands. District plan provisions play an important role in helping to deliver a broad range of housing types.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>

### AgResearch (066)

Need to provide sufficient buffer between research farms and urban development.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers noted the submission point.</p> <p>No changes are recommended in relation to this submission point.</p>
Maintain PIB in current proposed position for Rolleston and Lincoln.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).</p> <p>Our Space does not propose any changes to the projected infrastructure boundary.</p> <p>No changes are recommended in relation to this submission point.</p>

### Lyttelton Port Company (067)

Seeks extension of urban limits (PIB) to account for port reclamation area.
<p>Hearing Panel discussion and recommendation:</p> <p>Ms Appleyard, Counsel for Lyttelton Port Company, described the process of reclaimed land becoming formally 'land' for the purpose of planning documents, and the consequences for resource consent applications for land use activities. She said that the Port was essentially an industrial activity, in the CRPS, and therefore could be considered an urban activity. She acknowledged that the officers had recommended changes to the Existing Urban Area be considered as part of the review of the CRPS.</p> <p>The geographic extent of Greater Christchurch, for the purposes of Chapter 6 of the CRPS and Our Space, is the area shown on Map A in Chapter 6 of the CRPS. The reclamation area facilitated by the Lyttelton Port Recovery Plan is not located within the Greater Christchurch Area shown on Map A. This is because the boundary of the Greater Christchurch Area shown on Map A represents the territorial authority boundaries at the time that Map A was inserted into the CRPS. As the reclamation area was not 'land' at that time it did not fall within the territorial authority boundaries. Therefore, the reclamation area is not within the Greater Christchurch Area shown on Map A and the provisions of Chapter 6 of the CRPS do not apply. Likewise, the</p>

reclamation area sits outside the geographic area of focus for Our Space. On that basis, we do not consider Our Space or Chapter 6 of the CRPS to be an impediment to activities on the future reclamation site and do not consider it necessary, or appropriate, to identify the future reclamation site in Our Space.

We note for completeness that in accordance with section 60 of the Greater Christchurch Regeneration Act 2016, a decision maker on a resource consent application cannot make a decision that is inconsistent with the Lyttelton Port Recovery Plan. Under section 60(4), Lyttelton Port Company Limited may request that the Minister consider and decide whether a decision would be inconsistent with the Recovery Plan.

Officers consider that the appropriate process to consider any alteration to the Projected Infrastructure Boundary is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

We are satisfied that the officers recommendation is appropriate, and no changes are recommended in response to this submission point.

Seeks that sensitive activities are avoided in any development adjacent to the Midland Port facility in Rolleston.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure and integration with development) of the officers' report, and the reporting officers' reply report (question 7). They noted that the protection of key infrastructure (such as the port and airport operations, and railway network) from the adverse effects arising from development is considered to already be well-managed by the existing planning framework, including through Chapter 6 of the Canterbury Regional Policy Statement and district plans. Given the proposals in Our Space do not deviate from the growth strategy that has been in place for Greater Christchurch for some time, the proposals are not expected to have significant adverse effects on key infrastructure and therefore have only been briefly referenced.

We accept the officers' recommendation, and no changes are recommended in response to this submission point.

Include strategic freight routes and upgrading of the Brougham Street section of SH76 and possible Lyttelton freight tunnel.

Officers' comment:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 5 (Transport needs and implications, including public transport) and 10 (Provision and protection of key infrastructure and integration with development), and the reporting officers' reply report (question 7).

Officers noted that the strategic road and rail networks have been identified in the Business Capacity Assessment which informs Our Space but could be included in a final Our Space document. Constraints with SH76 are identified in the Business Capacity Assessment which informs Our Space. They also said that further investment options are better investigated through Land Transport Management Act processes.

Officers did recommend amending wording for Section 5.6 to provide greater explanation of freight hubs/networks and strategic infrastructure, with potential identification in Figure 18.

We accept the officers' recommendation and recommend that Our Space be amended accordingly.

Highlight constraints on rail network impacting freight now and into the future with expected growth.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport) in the officers' report. Officers consider the vision, strategic direction and work underway to implement the intent of recently updated transport plans, such as the Regional Land Transport Plan and Regional Public Transport Plan, will provide appropriate land

use and transport integration to support the consolidated urban form outlined in Our Space. Our Space is principally focused on the land use component of settlement planning and will need to monitor and review the implementation of such plans as part of subsequent capacity assessments.

We accept the officers' recommendation, and no changes are recommended in response to this submission point.

Supports roading overpass proposed at Rolleston.

Officers' comment:

Noted. Refer to the submission point above.

No changes are recommended in response to this submission point.

### Central City Business Association (068)

Opposes the proposed changes to the settlement plan as it will undermine the recovery of Christchurch, particularly in terms of the rebuild and revitalisation of the Central City.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts).

They said that the submission notes that the Central City Business Association (CCBA) is opposed to the proposed changes to the Greater Christchurch settlement pattern, but does not indicate what changes in particular the submission opposes. This makes it difficult to directly respond to the submission.

We agree that the submission lacks specificity.

No changes are recommended a result of this submission point.

Fully supports the ChristchurchNZ/Development Christchurch Ltd submission (Submission 077).

Hearing Panel discussion and recommendation:

We refer to our discussion and recommendation in respect of submission 77.

### Lincoln Developments Ltd (069)

Landowner seeks inclusion of additional land (outside the PIB) in north Lincoln.

Hearing Panel discussion and recommendation:

We accept the officers' evidence in set out in Section 4 Theme 4 of the officers' report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended in response to this submission point.
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands) in the officers' report.</p> <p>We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>11</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended in response to this submission point.</p>
Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended in response to this submission point.</p>
Proposes that Figure 16 should be included in District Plans rather than the CRPS.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.</p> <p>No changes are recommended in response to this submission point.</p>
Suggests that streamlined RMA processes be used to rezone the submitter's land.
<p>Hearing Panel discussion and recommendation:</p> <p>We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.</p> <p>No changes are recommended in response to this submission point.</p>

#### Brendon Harre (070)

New development in Waimakariri and Selwyn should be integrated with new rapid transport services.
<p>Hearing Panel discussion and recommendation:</p> <p>Mr Brendon Harre presented his submission to us at the hearing. He discussed the need to integrate housing with rapid transport and the lack of public transport placing reliance on private motor vehicles which affects peak time transport and subsequent productivity. If Greater Christchurch could reduce its car</p>

<sup>11</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

ownership, this would reduce congestion. Congestion charging and road pricing could be incorporated, but in order to do so, rapid transit is needed, and this links into density. He provided examples of development at Hobsonville of up to 100 households per hectare. He considered that with densities lower than 20 households per hectare, it would be difficult to provide rapid transit at a good cost. Mr Harre also showed how rent in the residential market had increased 41% over three and a half years, which placed a burden on households. Building a rapid transport network would help Christchurch out of the choice of congestion versus affordable housing, encouraging the city build upwards, rather than outwards, improving city liveability. Greater Christchurch would need to co-ordinate with central government to deliver such a project.

In response to Mr Harre's submission, officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport).

That notes that investment in rapid transport north and south-west of Christchurch City, and other service enhancements across the network, can support land uses change and encourage higher density development along such corridors. Officers said it is critical for achieving effective land use and transport integration that land use policies do align with transport investments. Planning and investment decisions, including identifying the most appropriate public transport mode, are the subject of further detailed work underway as part of business case processes. The officers' informed us that this ongoing work will help to determine what changes may be required through spatial and district planning to support the vision for a fully integrated transport system and urban form in Greater Christchurch.

The Regional Land Transport Plan and Regional Public Transport Plan highlight the potential for emerging technology and transport services to alter and enhance transport patterns, mobility and accessibility across Greater Christchurch. This will require ongoing monitoring and review but at this stage it is considered supplementary to the need to provide mass transit options across Greater Christchurch.

Our Space identifies how future transport plans can drive and support the proposed future settlement pattern but relies on these separate transport plans, required under the LTMA.

No changes are recommended in response to this submission point.

Use Urban Development Authority powers to achieve a mix of housing.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing and a range of housing types).

We note that the Authority, while it has been announced, does not yet exist. That will require legislative change.

No changes are recommended in response to this submission point.

Queries decline in growth from 2023 for all growth scenarios (page 9).

Hearing Panel discussion and recommendation:

Officers noted that the reason for this is that Statistics NZ is projecting that the recent historically high migration rates will reduce back to more average levels and the birth rate will drop.

We accept the recommendations of the officers and no changes are recommended in response to this submission point.

Densification requires rapid transport with delivery in the short to medium term.

Hearing Panel discussion and recommendation:

As we note above, transport matters are subject to other processes, including the Greater Christchurch Future Public Transport Business Case.

We accept the recommendations of the officers and no changes are recommended in response to this submission point.

End current dependence on the automobile.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts) and 5 (Transport needs and implications, including public transport).

The submission point is noted, but no changes are recommended in response to the submission point.

#### Allan Downs Ltd (071)

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.

Hearing Panel discussion and recommendation:

Support noted. No changes are required in response to this submission point.

Greenfield priority area should be rezoned ahead of identified future urban areas.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

#### Kevin and Bonnie Williams (072)

Seek to develop land on Marshs Road, Prebbleton for rural residential use.

Hearing Panel discussion and recommendation:

Ms Fiona Aston (planner) appeared on behalf of and Mr Kevin Williams and Ms Kelly Williams, seeking to develop their land for rural-residential purposes, or potentially industrial land use.<sup>12</sup> The site is approximately 55 hectares, after land was acquired for the Christchurch Southern Motorway, on the boundary of Christchurch and Selwyn districts.

Ms Aston considered the site was well serviced and is close to Christchurch, with services to the boundary. She noted that it is the buffer between Christchurch City and Prebbleton, but that the site is proposed for development of a low-density nature.

<sup>12</sup> Mr Kevin Williams and Ms Kelly Williams (#72)

In relation to rural residential land, the Canterbury Regional Policy Statement sets out a framework for consideration of these areas, and requires them to be included in a rural residential strategy in the case of Waimakariri or Selwyn District, or in the case of Christchurch City, no provision is made for further new rural residential land.

No changes are recommended in relation to this submission point.

Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology and do not consider rural residential development.

Hearing Panel discussion and recommendation:

We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, which considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>13</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended in response to this submission point.

#### Rolleston Industrial Holdings Limited (073)

Industrial development capacity does not accurately account for the space intensive and low employee occupancy nature of activities at I-Zone and I-Port.

Hearing Panel discussion and recommendation:

Rolleston Industrial Holdings opened iPort and own a further 25 hectares of land that has a railway siding. They seek that this land be included as a Future Development Area, should it be required.

We received evidence from Mr Phillips (planner) and Mr Copeland (economist), and received legal submissions from Ms Semple and further oral submissions from Mr Carter (Company Director) regarding the Rolleston Industrial land, in particular regarding freight movements and the availability of land related to iPort, which incorporates the Midland Port owned by the Lyttelton Port Company. The key criticism of the industrial land capacity assessment was that it did not properly take into account freight modes, and this was also identified as an issue for the Cockburn Trust land. Mr Carter offered that in his opinion, there would be serious land supply issues in the next 2-3 years, and that it was important to have additional land available that has a railway siding, to ensure that businesses wishing to use rail for freight could be efficiently supported.

We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, which considered that the business land capacity and feasibility work done by Greater Christchurch to be an example of 'best practice'.<sup>14</sup> The officers' position was that the Business Capacity Assessment methodology does take account of the different industrial sectors and applies different employee to floorspace / land area ratios. It looks not just at site specific landholdings but the wider industrial market. This includes land in southwest Christchurch (Hornby and Islington) where there are also significant areas of industrially zoned land. Officers consider that no further provision for industrial land is considered necessary at this time, and noted that the Greater Christchurch

<sup>13</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

<sup>14</sup> Page 18 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

Partnership will continue to monitor take up and market indicators and will review the capacity assessments on a three-yearly basis so as to be responsive to market needs.

We have considered the submissions and in particular the evidence of Messrs Copeland and Phillips, and the position of officers. We didn't receive any evidence regarding the makeup of business located next to rail sidings or with access to the rail network, nor whether specific land was being set aside for those businesses that require rail transport modes. We do think that a better understanding is required for the demand for this type of development with access to the rail network, and the potential impact that releasing more industrial land will have on the viability of existing centres. As such, we signal that it is appropriate that the Greater Christchurch Partnership look to refine its methodology for industrial business land by considering, as part of future capacity assessments, the impact of modal shift (from road to rail) on demand. We consider that this is also an important aspect of fulfilling the objectives under the Canterbury Regional Policy Statement for integrating land use and infrastructure.

We note that the land has specific infrastructure requirements associated with the rail network. We also note that an over-supply of specific types of industrial land should not be compared in the same way as an oversupply of residentially zoned land, which has the potential to impact on residential intensification objectives and targets in the central city and key activity centres, although they may have an impact on maintaining a compact urban form. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

We accept in part the submitter's request, to the extent of our recommendations for Environment Canterbury to engage with the landowner and for the local authorities to consider the relationship of transport modes to demand in specific locations as part of future capacity assessments.

#### Christchurch City Council (074)

##### Inconsistencies in Our Space.

Hearing Panel discussion and recommendation:

Officers provided a response in relation to inconsistencies in Our Space in the officers' report, along with an analysis of those matters in Appendix F to the report.

They noted that Table 3 of Our Space reports a surplus of housing development capacity in Selwyn District over the medium term of 1,125. The associated text (page 13) and table footnotes in Our Space, as well as the evidence base documented in the Capacity Assessment highlight that feasibility tests produced a wide range of results and that further work to improve the modelling tools was underway. Given such uncertainty with regard to the feasibility of development capacity (and the implications for sufficiency in the medium and long term) Our Space refers to a 'potential shortfall in capacity' in relation to this matter.

They told us how updated feasibility analyses for Selwyn and Waimakariri Districts completed prior to the Our Space consultation period but too late to be incorporated into the Our Space document, were included as part of the supporting consultation material. This was therefore available to submitters and reinforced the work required to refine feasibility and sufficiency conclusions as part of a final Our Space document. Christchurch City Council did not appear in relation to its submission.

Officers recommended updating the Actions in Our Space to work on an improved methodology for capacity and making amendments to the wording of Section 3.2. We accept the reasons and recommendations of the officers. We understand that density in new urban areas in the Selwyn and Waimakariri Districts remains an issue.

Updating proposed policy interventions to reflect emerging data.

Hearing Panel discussion and recommendation:

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected future demand) in the officers' report.

They said that throughout Our Space the need for ongoing monitoring and review of the evidence base to support decision making is clearly stated. This is a requirement of the NPS-UDC as part of monitoring of market indicators and the preparation of a capacity assessment at least every three years (with subsequent consideration to review housing targets and the future development strategy where necessary).

We accept the officers' position on this matter, noting that policy interventions are available to reflect emerging data. In particular, for the short to medium term these can be addressed in the review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended in response to this submission point.

Sequencing of development.

Hearing Panel discussion and recommendation:

Officers referred to the recommendations outlined in Section 4 in relation to Theme 5 (Sequencing and staging of greenfield land) in the officers' report. In addition, the evaluation in Appendix F of the officers' report is also relevant. In relation to this they recommend that sequencing is identified as part of structure planning processes and infrastructure servicing, which is best determined by the relevant territorial authorities. They noted that such processes would need to have regard to existing Canterbury Regional Policy Statement provisions, and recommended wording amendments to clarify this.

We accept the officers' reasons and recommendations on these matters, and accept the submission in part to the extent that the changes outlined in theme 5 of the officers' report are made clarifying that sequencing will be addressed in the manner described.

Intensification in townships and increase densities in greenfield areas and future development areas.

Hearing Panel discussion and recommendation:

Christchurch City Council seeks a minimum net density of 15 households per hectare, while the remaining Councils are satisfied that 12 households per hectare is appropriate. The Chief Executives of the Greater Christchurch local authorities presented to us in relation to achieving 12 households per hectare as part of the district plan review processes.

The Hearing Panel heard oral evidence regarding densities from developers and planners undertaking work within Rolleston and Waimakariri, as well as evidence from individuals seeking higher densities in the settlement areas outside of Christchurch. Generally, the position was that 12 households per hectare is appropriate in those areas. This is higher than the current requirement of 10 households per hectare in the Canterbury Regional Policy Statement.

Having considered the Christchurch City Council's submission and the officers' position, we accept the officers' position in part. In terms of timing, we do not agree with officers that a review of density takes place as part of the 2019 change to the Canterbury Regional Policy Statement. We consider that this a matter for the review of the Canterbury Regional Policy Statement in 2022, as it has the potential to stall the change process planned for 2019, which is urgently required. In addition, we consider that Our Space contains a strong direction that 12 households is to be achieved in the interim. We are satisfied on the evidence we received that this is both achievable and appropriate.

Factoring in rural capacity.

Hearing Panel discussion and recommendation:

Officers recommended in Appendix F of the officers' report that Table 3 in Section 3.2 be updated in relation to this submission point to recognise rural capacity, and made recommendations to include this in future updates for capacity assessments, noting factors that create uncertainty around the assessment.

We accept the officers' position and therefore accept the submission, and recommend changes in accordance with officers' recommendations.
Reviewing business sufficiency.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers told us that modelling of business demand was undertaken for the Capacity Assessment using the projected household demand in Table 1 of Our Space. With the development of Our Space, in particular the proposed housing targets in Table 2, there was insufficient time to remodel the implications of such an alternative apportionment of demand by each territorial area.</p> <p>Population growth generally and in different locations will have an impact on the economy, the growth of the workforce and demand for business land or floorspace. Remodelling of business demand using the housing targets in Table 2 Our Space was completed and Table 4 amended to reflect this more accurate assessment of business sufficiency.</p> <p>We accept the officers' reasoning and update Table 4 accordingly.</p>
Addressing social and affordable housing.
<p>Hearing Panel discussion and recommendation:</p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing).</p> <p>Officers noted that Figure 13 (page 20) of Our Space outlines the workstreams anticipated to comprise an action plan to enable social and affordable housing provision across Greater Christchurch, and Action 2 in the schedule of further work in Our Space section 6.2 specifically identifies this initiative for completion during 2019-2020.</p> <p>They said that the more specific mechanisms proposed in the CCC submission primarily relate to RMA land use provisions that can be addressed through respective district plan reviews (including the related submission points on appropriate densities in Selwyn and Waimakariri Districts and the officer response outlined in this Officers Report). Section 5.3 and Action 9 in section 6.2 of Our Space also reference the investigation of redevelopment and intensification opportunities in existing urban areas and close to town centres (which would presumably encourage smaller lot sizes and multi-unit dwellings).</p> <p>We accept the officers' position on this submission for the reasons set out above and no changes are recommended in response to this submission point.</p> <p>No changes to Our Space are recommended in response to this submission point.</p>

#### Ministry of Education (075)

Overall support for the proposed strategy, and the inclusion and consideration of social infrastructure.
<p>Hearing Panel discussion and recommendation:</p> <p>The submission point is noted.</p> <p>No changes are recommended in response to this submission point.</p>
Encourages councils to undertake early engagement with the Ministry when implementing development areas.
<p>Hearing Panel discussion and recommendation:</p> <p>The submission point is noted.</p>

No changes are recommended in response to this submission point.
Support for the concept of a '10-minute neighbourhood' but notes there is limited commentary in Our Space.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.</p> <p>We accept the officers' recommendation with the recommended clarification.</p>
Encourages exploring opportunities for the Ministry and councils to share recreational and community facilities.
<p>Hearing Panel discussion and recommendation:</p> <p>The submission point is noted.</p> <p>No changes are recommended in response to this submission point.</p>

#### Carter Group Limited (076)

Landowner seeks inclusion of additional land (outside the PIB) in Kainga.
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report. The officers' position is that no new industrial areas are proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, that the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.</p> <p>We accept the officers' position on this. However, we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engages with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.</p>

#### ChristchurchNZ and Development Christchurch Limited (077)

Proposed settlement pattern approach in Our Space driven by growth forecasts rather than an active approach that considers how urban areas should be developed to meet broader strategic aspirations.
<p>Hearing Panel discussion and recommendation:</p> <p>We heard from Mr Nick Bryan and Mr Steve Clarke for ChchNZ and Development Christchurch. In preparing the Strategy, Mr Clarke would have liked to have seen explicit analysis of the strategic priorities for Greater Christchurch and how these shape the settlement patterns to best deliver these. He considered the starting point should be an articulation of the preferred outcomes, then an analysis of how spatial distribution of activities can best support these. Instead, the proposal provides for a passive approach, responding to demographic forecasts. The organisations would prefer an approach that responds to outcomes.</p>

Officers said that the principal aim of Our Space is to ensure that there is sufficient housing and business development capacity in Greater Christchurch to support future demand, and that this demand is supported in a way that aligns with the vision, principles and strategic goals of the Urban Development Strategy.

The main source of demand for housing and business space relates to population growth. To understand the scale and type of demand that is likely in the future, Policy PB2 of the NPS-UDC states that local authorities shall use information on demand when preparing their capacity assessment, including likely demographic changes using Statistics NZ population projections.

They noted to accommodate these projected demands in a way that aligns with broader strategic aspirations for Greater Christchurch, Our Space was guided by the strategic directions of the Urban Development Strategy. This is set out in Section 2.3 of Our Space. The long term settlement pattern approach outlined in Our Space reflects the previously agreed urban limits of the Urban Development Strategy and the Canterbury Regional Policy Statement.

Adopting a transitional approach to housing targets in Our Space also demonstrates a clear strategic consideration of how future demand should be accommodated in Greater Christchurch, diverging from the adopted growth projections. This approach directs more demand to be supported through redevelopment in the City over the long term.

Taking into account the explanation from officers, we consider that the approach taken is correct, and aligns with both the requirements NPS-UDC and the vision, principles and strategic goals of the Urban Development Strategy.

We accept the position of officers' and as a result, we do not recommend any change in response to this submission point.

Cities' prosperity is vulnerable unless the mix of economic activity shifts away from reliance on the rebuild and servicing the local population, which requires the aspiration to create new and better economic prospects.

Hearing Panel discussion and recommendation:

Officers noted that Our Space does not determine the types of economic activities to be undertaken across Greater Christchurch, but seeks to ensure there is sufficient commercial and industrial space available to support business needs over the long term. The Capacity Assessment indicated this capacity is well planned for with the Central City recognised as the core commercial hub for the Greater Christchurch area.

We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.

Insufficient attention is given to the importance of driving urban growth to the central city and inner suburbs in the short to medium term, to position Greater Christchurch as an attractive proposition in the long term.

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, Our Space identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the adopted projections.

They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We note the principle behind the submission, and to that extent we accept it. No changes are proposed to Our Space in response to the submission point.

Concern regarding the information and assumptions used in the preparation of Our Space, specifically in terms of the post-earthquake effects on population and employment forecasts.

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). They note that the projections are only the starting point for spatial planning. For instance, they said, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances.

We accept that there is uncertainty in the projections. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood. No changes are recommended in relation to this submission point.

Specific comment on the Executive Summary, that wellbeing strategies should inform and drive settlement pattern strategies, not be made to fit and complement them.

Hearing Panel discussion and recommendation:

Officers noted the submission point.

No changes are recommended in relation to this submission point.

Specific comment on Section 2.1 (page 3), that central city employment levels are well-below pre-earthquake levels and there is still a long way to go to create a vibrant 'principal commercial hub' for the region.

Hearing Panel discussion and recommendation:

Officers acknowledged that wording in Our Space related to Central City employment levels nearing those attained prior to the earthquakes may be misleading and should be amended.

We agree and recommend amending Section 2.1 of Our Space to clarify that employment levels in the Central City remain below pre-earthquake levels.

Specific comment on Section 4.1 (page 15), that a key issue that is missing is the need to ensure momentum in regeneration is maintained and accelerated to create a vibrant urban centre and higher economic relevance.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts). They note and support the submission point highlighting the importance of the Central City and that it should be a

focus for development. However, the challenges outlined in Section 4.1 relate to an assessment across Greater Christchurch and have not identified where in particular such issues are most important.

For the reasons set out, no change is recommended.

#### Lincoln University (078)

Need to provide sufficient buffer between research farms and urban development.

Hearing Panel discussion and recommendation:

Officers noted the submission point.

No changes are recommended in relation to this submission point.

Maintain PIB in current proposed position for Rolleston and Lincoln.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district).

Our Space does not propose any changes to the Projected Infrastructure Boundary.

No changes are recommended in relation to this submission point.

#### KiwiRail Holdings Limited (079)

Support for UDS principles and strategic goals guiding Our Space, and reference to the GPS on Land Transport.

Hearing Panel discussion and recommendation:

We heard from Ms Rebecca Beals (RMA team leader) and Ms Jeanine Benson in relation to the submission from KiwiRail Holdings Limited.

In relation to this submission point, support is noted, and no changes are recommended.

Industry and tourism growth is anticipated to result in some increased demand on the rail network.

Hearing Panel discussion and recommendation:

Comment is noted, no changes are recommended.

Relevant business areas should be appropriately protected and developed, along with links to the transport network, to ensure existing rail functions and future opportunities to use rail are not compromised.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure and integration with development) in the officers' report.

The rail network is strategic infrastructure for Greater Christchurch that requires protection from inappropriately located development, thereby ensuring safety and efficiency are not compromised, or reverse sensitivities created. The submitter notes that KiwiRail already works closely with councils to ensure such issues are recognised and addressed through district plans, which is the appropriate planning mechanism to address such matters.

We consider that that protection is adequately recognised and provided for in the Canterbury Regional Policy Statement. No changes are recommended in relation to this submission point.

Need to ensure any new development does not generate reverse sensitivities for the rail network.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 10 (Provision and protection of key infrastructure and integration with development) in the officers' report.

The rail network is strategic infrastructure for Greater Christchurch that requires protection from inappropriately located development, thereby ensuring safety and efficiency are not compromised, or reverse sensitivities created. The submitter notes that KiwiRail already works closely with councils to ensure such issues are recognised and addressed through district plans, which is the appropriate planning mechanism to address such matters.

We consider that that protection is adequately recognised and provided for in the Canterbury Regional Policy Statement. No changes are recommended in relation to this submission point.

Will work with the Partnership where possible to assist in achieving the vision for the transport network.

Hearing Panel discussion and recommendation:

Comment is noted, no changes are recommended.

Seeking clarification around what is intended in terms of improvements to the transport network, and that KiwiRail is party to any discussions that have implications for the rail corridor.

Hearing Panel discussion and recommendation:

These matters will be further explored as part of transport business cases.

No changes are recommended in relation to this submission point.

Include a reference in Section 5.6 of Our Space that future growth may require changes to the rail network.

Hearing Panel discussion and recommendation:

These matters will be further explored as part of transport business cases. Changes are recommended to section 5.6 to provide further detail about transport business cases.

Expand the last paragraph in Section 5.7 of Our Space (beginning "Further more detailed assessment...") to include consideration of how future growth areas will integrate with land transport.

Hearing Panel discussion and recommendation:

These matters will be further explored as part of transport business cases.

No changes are recommended in relation to this submission point.

Robert Fleming (080)

Considers that Christchurch City should be developed prior to additional greenfield space outside the city boundaries (cost, efficient infrastructure provision, diminishing quality and quality of productive land).

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the adopted projections.

<p>They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.</p> <p>Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.</p> <p>They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.</p> <p>We accept the officers' reasons and recommendations on this, and do not recommend any changes in response to this submission point.</p>
<p>Supports active and public transport options, better transport options within the city, shared transport options, and rapid transit between regional Canterbury towns combined with workable park and ride solutions.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport) in the officers' report.</p> <p>The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Better transport options to industrial areas should be provided for.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport) in the officers' report.</p> <p>The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.</p> <p>No changes are recommended in response to this submission point.</p>

Malc Dartnall (081)

<p>Highlights a lack of larger houses.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing and a range of housing types).</p>

<p>Officers said that the evidence underpinning Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded, increasing the need for smaller and multi-unit dwellings to complement the existing housing stock dominated by larger standalone houses. The number of larger families, as a proportion of overall household growth, is predicted to decline. Our Space seeks to provide for the range of housing types likely to be needed to accommodate future population growth – it does not preclude the development of larger houses. Our Space will need to monitor and review the anticipated scale and pace of changes to housing demand as part of subsequent capacity assessments.</p> <p>We accept the officers' reasons and recommendations and do not recommend any changes in response to this submission point.</p>
<p>Concerned that the current planning framework encourages small houses and disregards the needs of larger families; considers that Our Space should be family friendly with the needs of larger families specifically mentioned.</p>
<p>Hearing Panel discussion and recommendation: We refer to the evaluation in relation to the above submission point and do not recommend any changes in response to the submission point.</p>
<p>Considers there is a lack of industrial zoned land in Waimakariri.</p>
<p>Officers note that the Capacity Assessment identified a significant oversupply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 of Our Space outlines these findings.</p> <p>We accept the officers' recommendations and do not recommend any changes in response to this submission point.</p>

Helen Broughton (082)

<p>Concerned that this process is occurring so soon after the same issues were considered through the Christchurch District Plan Review.</p>
<p>Hearing Panel discussion and recommendation: We note that the development of Our Space, being a future development strategy, is a requirement under the NPS UDC and is mandatory.</p> <p>No changes are recommended in response to this submission point.</p>
<p>Suggests that both low and medium growth projections should be used.</p>
<p>Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands).</p> <p>Our Space adopts population projections that reflect recent growth trends in Greater Christchurch, with the rationale for the adopted projections fully documented in the Capacity Assessment. The projection scenario used for the purposes of Our Space anticipates a Greater Christchurch population of 640,000 in 2048, which is higher than Statistics NZ's medium (or most likely) projections by 22,000, but much lower than Statistics NZ's high projections that anticipates a population of 742,000 in 2048. The projection scenarios considered in developing Our Space are shown in Figure 7.</p> <p>It is of note that in developing the Urban Development Strategy in 2007, the Greater Christchurch population was expected to be in the region of 550,000 in 2041. In comparison, the projections used for Our Space anticipates this population closer to 2031, some ten years sooner than was anticipated by the 2007 UDS.</p>

In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

No changes are recommended in response to this submission point.

Questions whether the decrease in home ownership in Christchurch identified on page 11 is realistic.

Hearing Panel discussion and recommendation:

Officers advise that the projected decrease in home ownership rates reported on page 11 was one of the findings of a comprehensive assessment of the future housing demand profile for Greater Christchurch commissioned as part of the Capacity Assessment (Livingston Associates, Housing Demand in Greater Christchurch). This refers to the proportion of the additional households projected in Christchurch City over the period to 2048 whose housing needs are likely to be met by the rental market.

No changes are recommended in response to this submission point.

Suggests that given there is sufficient housing in Christchurch City major urban planning changes for Christchurch need not occur.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands).

No changes are recommended in response to this submission point.

Identifies negative effects of intensification. Comments that intensification should be directed to the central city, with no further intensification in suburban Christchurch beyond what is currently permitted; if intensification is further considered any area the [Christchurch District Plan Review] Hearings Panel judged to be inappropriate for medium density should retain suburban density. If medium density is to be continued it should have allowance for parking and more courtyard space and plantings.

Hearing Panel discussion and recommendation:

In response to questions from the Panel, Ms Broughton said that in Ilam, some accommodation was needed for students, but that students do have cars and can travel. Ms Broughton considered that the current zonings were enough. She thought there would need to be an attitude change to transport, and that would only happen if the price of petrol went up. She would prefer to see greenfield land opened up, or intensification in the city, before additional intensification took place in the suburbs.

Officers refer to comments and recommendations outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing and a range of housing types).

We note that the Independent Hearings Panel left future decisions regarding further up-zoning to the Christchurch City Council.

No changes are recommended in response to this submission point.

Considers there is sufficient land in Christchurch City for the long term with low to medium growth and no need to focus on further medium density areas.

Hearing Panel discussion and recommendation:

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). Officers noted that Statistics NZ population projections remain the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to changing trends. Officers said that

the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept the officers' position and no changes are recommended in response to this submission point.

Questions the accuracy of the infographic in Section 3.2 of Our Space (p 11) with regard to the affordability constraints of new households.

Hearing Panel discussion and recommendation:

Officers addressed this matter in their Reply Report. They considered that on investigation, the wording in the infographic should more accurately read:

62% of new ~~households housing~~ in the City, 35% in Selwyn and 58% in Waimakariri.

Officers stated that this information is derived from the expert analysis of Livingston Associates who prepared a Housing Demand Assessment as part of the Capacity Assessment. This work used Statistics NZ demographic data and extrapolated current trends in household size, income and other classifications through to 2048.

New households formed over the next 30 years are expected to experience increasing affordability pressures, even with a sufficient supply of new housing appropriate to the needs of a changing household composition. An important aspect of this infographic however is that it is the total housing stock available that would need to meet the financial thresholds identified (i.e. under \$350,000 to buy or \$200/week to rent) to be considered affordable.

We accept the officers' position and changes recommended.

### Youth Voice Canterbury (083)

Keen to identify how Our Space meets priorities identified in youth strategies, action plans and surveys and consider how the future settlement pattern proposed addresses the challenges over the next 30 years and the quality of life of future generations.

Hearing Panel discussion and recommendation:

Youth Voice Canterbury tabled information in relation to their submission, which included a number of closing recommendations. Officers considered that this information was best addressed by other processes. We note the issues of concern for Youth Voice, and identify the following processes where these matters may be followed up, or more appropriately addressed in relation to each recommendation:

1. Enforce warrant of fitness standards for houses to ensure that all homes built in the future are of high standards – this is better addressed at a national level through legislative change and will be considered as part of rental tenancy reform.
2. Ensure there is some form of community, low income housing to provide a space for the homeless especially those who are young – this is addressed by housing agencies, but we note that it also is picked up in part by an action in Our Space (Action 2).
3. Investment in more buses that travel around the suburbs/communities without going into the central city – this is a matter for the Regional Public Transport Plan.
4. Re-introduce the free shuttle around the central city – this is a matter for the Regional Public Transport Plan.

5. Reduction of the price of the trams for locals so they are affordable and able to be used as public transport – this is a matter for the Regional Public Transport Plan.
6. Invest in light rail from Kaiapoi/Rangiora to Rolleston, via east side/Marshland area and provide funding and support the introduction of innovative transport concepts like solar powered trains – this is a matter for the Regional Public Transport Plan although we note that amendments have been made in Our Space around transport and funding and identification of rapid transit routes.
7. More opportunity for cultures to express themselves through cultural events – this is a matter that is appropriately directed to district council long term planning and annual planning processes.
8. Increase knowledge of diversity through cultural hubs - this is a matter that is appropriately directed to district council long term planning and annual planning processes.
9. Use empty land and city council public areas to make youth friendly spaces - this is a matter that is appropriately directed to district council long term planning and annual planning processes.
10. Increase outdoor seating, street lighting, and shaded areas - this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.
11. Improve footpaths - this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.
12. Make the central city greener, create more and improve places and walks with native trees and fauna, and increase community input into creating green spaces - this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.
13. Ensure green spaces have natural and peaceful seating areas and adequate lighting - this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.

We accept the officers' position and no changes are recommended in response to this submission point except to the extent that amendments are recommended to Our Space in relation to Action 2 in the Schedule of Further Work and transport and funding and identification of rapid transport routes.

Richard Graham (084)

Considers that the plan should first consider what level of population growth (if any) there should be in Greater Christchurch and questions whether providing for housing and infrastructure for levels growth indicated by Statistics NZ projections is the best outcome for the region.

Hearing Panel discussion and recommendation:

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (Accuracy and uncertainties of projected demands). Officers noted that Statistics NZ population projections remain the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to any changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept officers' position and no changes are recommended in response to this submission point.

No assessment of the impact of further urban expansion on existing rural amenity or on holiday destinations.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts).

The comment related to impacts on holiday destinations is noted, but is beyond the scope of matters considered in Our Space.

We accept officers' position and no changes are recommended in response to this submission point.

Comments that all new developments should be encouraged to provide a range of housing typologies that provide for a range of family sizes and requirements.

Hearing Panel discussion and recommendation:

Officers noted that Our Space supports the delivery of a range of housing types, sizes and tenures that will be required to meet future demand, including by responding to projected changes in housing need and demand over the next thirty years. District planning plays an important role in the delivery of a broad range of housing types.

We accept officers' position and no changes are recommended in response to this submission point.

Comments that new commercial development should be contained within existing commercial hubs where possible, particularly encouraging greater activity within the CBD.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation on this, with the recommended clarification.

Pomeroy's round table (085)

Submission withdrawn

Kieran Williamson (086)

Considers that greenfield development in exurban areas such as Rolleston, Rangiora and Kaiapoi is unsustainable (increased CO2 and PM pollution, congestion and obesity).

Hearing Panel discussion and recommendation:

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the projections.

They considered this holistic approach to targets seeks to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

<p>Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.</p> <p>They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.</p> <p>We accept the position of the officers and no changes are proposed to Our Space in response to the submission point.</p>
<p>Proposes that all future development should be restricted to the current Christchurch City limits and a large majority of new development should be multi-unit dwellings (close to shopping, work and public transport) with single family detached dwellings discouraged.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>We refer to the above evaluation, in respect of Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. For the reasons referred to above, we do not recommend any changes to Our Space in response to the submission point.</p>
<p>Our Space pays only lip service to reducing greenhouse gas emissions.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 11 (Addressing climate change and achieving sustainability and zero carbon goals). We generally accept the officers' position on those matters, however we recommend changes with regard to addressing climate change, achieving sustainability and zero carbon goals. We consider this merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.</p>
<p>Large format retail serviced only by road corridors and suburban shopping mall developments should not be allowed to develop in new areas or expand in existing commercial areas.</p>
<p>Hearing Panel discussion and recommendation:</p> <p>Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood') in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. They said that Our Space reflects the current Canterbury Regional Policy Statement direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.</p> <p>We further note provision for neighbourhood centres in each of the district plans in Greater Christchurch, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10-minute neighbourhoods.</p> <p>We accept the officers' recommendations on this, and do not recommend any changes in response to this submission point.</p>
<p>Small scale retail and office development should be allowed in areas without sufficient existing amenities within walking distance.</p>
<p>Hearing Panel discussion and recommendation:</p>

We refer to the evaluation above, namely that Our Space reflects the current policy direction in the Canterbury Regional Policy Statement, in regards to Central City and Key Activity Centres which integrate high quality public realm spaces and are well connected to public transport services and safe cycle network.

We do not recommend any changes in response to this submission point and accept the officers' recommendations outlined in Section 4 in relation to Theme 8 (Focusing commercial activity in key centres and the nature of the '10-minute neighbourhood').

Suggests that the best way to retain and increase the viability and vitality of existing commercial centres is to increase the density of housing within the catchment areas of these centres; replace existing old stock single family occupancy homes with multi-unit dwellings and develop greenfield and other underutilised spaces within existing city limits.

Hearing Panel discussion and recommendation:

Officers noted that Our Space promotes greater densities around key centres. District Plan provisions also play a key role in this regard. The Christchurch District Plan is enabling of residential intensification within and surrounding existing centres. The recent Christchurch District Plan Review up-zoned many areas around Key Activity Centres to facilitate medium density residential development and considerable potential also exists within the central city to support the CBD economy.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Considers priority should be given increasing / ensuring public transport access to industrial areas.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport) in the officers' report.

The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the transport network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.

Officers have recommended changes to include more detail on the transport business cases underway.

We agree with these recommendations. No further changes are recommended in response to this submission point.

Supports higher densities within the current city limits.

Hearing Panel discussion and recommendation:

This submission is noted, and no changes are recommended in response to this submission point.

Axel Wilke (087)

Supports the sentiments expressed in Our Space.

Hearing Panel discussion and recommendation:

Support noted. No change is recommended in response to this submission point.

Does not consider the targets set in Our Space are ambitious enough to prevent further climate change; much of the development will only be supportable by auto-centric lifestyles; objective should be to define high-capacity public transport corridors with high density alongside; greenfield developments should only be permissible with good public transport provision from day one.

Hearing Panel discussion and recommendation:

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 5 (Transport needs and implications, including public transport). We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

#### Colin Eaton (088)

Considers that Christchurch does not have the infrastructure to support more growth – identifies concerns relating to drainage, stormwater, sewerage and market garden land and orchards.

Hearing Panel discussion and recommendation:

Infrastructure is planned out for a period of 30 years under the infrastructure strategies prepared under the Local Government Act 2002. Matters such as market gardens and orchards can be address through treatment of land and sampling under the relevant National Environmental Standards.

No changes are recommended in response to this submission point.

Comments that social housing does not mix well.

Hearing Panel discussion and recommendation:

Noted. No changes are recommended in response to this submission point.

Suggests that all vacant industrial land and buildings should be revitalised before planning for more industrial areas.

Hearing Panel discussion and recommendation:

No new industrial areas are planned given the existing significant supply of industrially zoned land in Greater Christchurch. No changes are recommended in response to this submission point.

Considers that the plan should show we care for the future and city environment not driven by the economy and greed.

Hearing Panel discussion and recommendation:

Noted. No changes are recommended in response to this submission point.

Comments that the transport network will only work if it is good and regular and private cars are banned from the central city.

Hearing Panel discussion and recommendation:

The suggestion to ban cars from the city centre is out of scope of the matters considered in Our Space.

No changes are recommended in response to this submission point.

#### Chris Morahan (089)

Considers that resolving distortions in the housing market created by the transport system and removing planning rules that restrict dense development will lead to higher demand in the inner city and along public transport corridors, and lower demand in outlying auto-centric suburbs like Rolleston and Rangiora, in the future.

Hearing Panel discussion and recommendation:

Noted. No changes are recommended in response to this submission point.

Agrees with intensifying the inner city and public transport corridors; disagrees within more auto-centric sprawl.

Hearing Panel discussion and recommendation:

Mr Chris Morahan presented his submission. Mr Morahan is a transport planner and blogger. Mr Morahan described how the decisions being made now would make a big impact on his daughter and her peers, than it would on the current people in the room. He referred to the Intergovernmental Panel on Climate Change and its recent reported on the current state of climate change, and its conclusions. He noted that even without climate change, modal shift provides for public health benefits and safety. He noted that the draft public transport plan was released, and the general theme of submissions was that public transport needed to go further, and it should address passenger rail. He referred to a recent Colmar Brunton survey that noted more than 50% of people are concerned about climate change and the need to act.

In relation to development, Mr Morahan observed that higher density is needed, pedestrian connections are required, with well-planned corridors, and areas are contiguous. He said that people will use rail corridors if rail is provided. He considered it was likely there will be a zero carbon act, with better carbon prices, and a need for better walking and cycling. His three takeaway points would be a need for more ambitious intensification around existing corridors, no more greenfields sprawl, and not to preclude existing rail corridors. He considered while the text of Our Space was good, it didn't line up with percentages of greenfield development that are proposed, and he did not think it would deliver a dense compact city.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on projections.

They considered this holistic approach to targets seeks to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

Considers the plan should seek to allow commercial development everywhere it can and let businesses gravitate to the best location for them.

Hearing Panel discussion and recommendation:

Officers noted that Our Space has been prepared in accordance with the existing principles of the Urban Development Strategy and policy framework of the Canterbury Regional Policy Statement. Both documents reinforce the centres-based approach. Any change in policy direction regarding the centres-based approach is more appropriately considered as part of the 2022 review of the Canterbury Regional Policy Statement.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.
Strongly agrees with promoting higher densities around key centres. Suggests that railway lines could be included as key future public transport routes.
Hearing Panel discussion and recommendation: We understand that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case. No changes are recommended in response to this submission point.

Wayne Phillips (090)

Large greenfields development in Rangiora and Rolleston will lock in auto dependence.
Hearing Panel discussion and recommendation: Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts) and 6 (Transport needs and implications, including for public and active transport). We accept the officers' recommendations and do not recommend any changes in response to this submission point.
Planning for other transport options for such towns needs to take place now.
Hearing Panel discussion and recommendation: We understand that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case. No changes are recommended in response to this submission point.
Encourage key worker housing (such as nurses, police, teachers).
Hearing Panel discussion and recommendation: Officers referred us to the comment and recommendation outlined in Section 4 in relation to Theme 9 (Provision of social and affordable housing, and a range of housing types).  The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. However, specific details of such an action plan have yet to be determined. The action plan is discussed in Section 5.1 and Section 6.2 of Our Space. This may help to facilitate housing for such workers.  We accept the officers' position that no changes are required and no changes are recommended in response to this submission point.
Basing projections on high post-EQ rates is dangerous.
Hearing Panel discussion and recommendation: Officers noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term. It is in the apportionment between territorial authorities that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes in response to this submission point.

#### Landowners ODP 12 Rolleston (091)

Landowners supporting inclusion of existing greenfield land (within PIB) on East Maddisons Road, Rolleston.

Hearing Panel discussion and recommendation:

We heard from Ms Angelene Holton, a landowner, regarding low value rural land which has been identified in Our Space as a Future Development Area. Ms Holton described how the area (known as ODP Area 12B) at the southern end of Rolleston was not included in the Land Use Recovery Plan changes to the Canterbury Regional Policy Statement. The land is low value rural land that is not of use for much more than grazing horses. Ms Holton advised that she had provided submissions to the Minister on the Land Use Recovery Plan. A copy of the submission to the Minister was attached to her submission. The submission was not supported, and the land was subsequently not included in Map A, Chapter 6 of the Canterbury Regional Policy Statement.

Ms Holton described how, in response to questions from the Panel, how this was a constraint to development. Ms Holton generally supported the Our Space document, which identifies the land in which she has interest as a Future Development Area (notated orange in Figures 15 and 16 of the Strategy), although she remained concerned that she had been advised that a private plan change would be required to release the land.

It is noted that changes will still be required to both the Canterbury Regional Policy Statement and the relevant district plan in order for subdivision and development to occur on the site, and that further discussions are required with Selwyn District Council as to timing.

No changes are recommended in response to the submission point.

#### John Law (092)

Landowner seeks inclusion of additional land (outside the PIB) for industrial use on Main South Road. Considers that the CRPS inadequately accounts for future industrial development trends.

Hearing Panel discussion and recommendation:

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (Need for further greenfield areas, including specific sites proposed in each district) in the officers' report. The officers' position is that no new industrial areas should be proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of Chapter 6 of the Canterbury Regional Policy Statement scheduled for 2022 as part of the review of the Canterbury Regional Policy Statement. This review is identified in Section 6.2 in the schedule of future work.

We accept the officers' position on this, and no changes are recommended in response to this submission point.

## **APPENDIX 2 – Our Space document**

This incorporates amendments recommended in the Addendum dated 5 June 2019 to the Report and Recommendations of the Hearings Panel.



Greater Christchurch  
Partnership

Te Tira Tū Tahī  
One Group, Standing Together

# OUR SPACE 2018-2048

## Greater Christchurch Settlement Pattern Update

Whakahāngai O Te Hōrapa Nohoanga

~~Draft for Consultation — November 2018 [Month]~~

Recommendations Version 5 June 2019

**[INSERT MESSAGE FROM PARTNERS AND MIHI]****What this document is about**

This Settlement Pattern Update (Update) to the Greater Christchurch Urban Development Strategy (UDS) is a review of the land use planning framework for Greater Christchurch. It outlines the Greater Christchurch Partnership's proposed settlement pattern and strategic planning framework to meet our land use and infrastructure needs over the medium (next 10 years) and long term (10 to 30 years) periods. The Update has been prepared in order to satisfy the requirement to produce a future development strategy, as outlined in the National Policy Statement on Urban Development Capacity (NPS-UDC).

**Why you should make a submission**

The Partnership wishes to hear from stakeholders and the public to ensure the decisions made in relation to the Update are well informed by feedback. This includes whether the proposed planning directions set out in this consultation draft will sufficiently provide for the needs of people and communities, and our future generations, and support broader opportunities to improve social, economic, cultural and environmental wellbeing by planning for growth and development.

Submissions will help shape the final content of the Update, which is due to be adopted early in 2019. Your input is important to let us know whether you consider we have got it right, and if not, what needs to be changed and why.

**How to make a submission**

Anyone can make a submission. It may be in written, electronic or audio format, and can range from a short email or letter on a single issue, to a more substantial document covering multiple issues. Please provide any supporting facts, figures, data, examples and documentation where possible to support your submission. Every submission is welcome, however, identical submissions will not carry any more weight than the merits of the arguments presented.

A submission form is available on the Partnership's website at [www.greaterchristchurch.org.nz/ourspace](http://www.greaterchristchurch.org.nz/ourspace)

Submissions may also be emailed to [ourspace@greaterchristchurch.org.nz](mailto:ourspace@greaterchristchurch.org.nz)

Submissions made in Word or searchable PDF formats are preferred. Hard copies may also be posted, particularly if appending other material. If you send your submission by post, please also email an electronic copy if possible. Postal submissions should be addressed to:

**Our SPACE Consultation  
Greater Christchurch Partnership  
PO Box 73012  
Christchurch 8154**

Submissions should include the submitter's name and contact details, and the details of any organisation represented. **Please clearly state if you wish to be heard in support of your submission.** The Partnership will not accept submissions that, in its opinion, contain inappropriate or defamatory content.

The deadline for submissions is **30 November 2018**.

**What the Partnership will do with submissions**

The Partnership will make all submissions publicly available on its website.

Your written comment, including your name, will become public information. If you consider there are compelling reasons why your name and/or feedback should be kept confidential please outline this in your submission. Even if

~~you request confidentiality we may have to release your written comment at a later date if a request is made under the Local Government Official Information and Meetings Act 1987 or the Official Information Act 1982.~~

~~A Hearings Panel will hear from submitters wishing to be heard, review the content of all submissions and make recommendations on changes to this consultation draft. A final version of the Update, which has been informed by the feedback received and any further information, will be considered by the Partnership for adoption, followed by ratification of the Update by constituent partner councils.~~

#### ~~Other ways to participate in the consultation~~

~~The Partnership's constituent partner councils will be holding drop in sessions in Christchurch, Rolleston and Rangiora. Further details are available on the Partnership's website.~~

DRAFT

## Mihi

---

Hārō ana te kāhu i te ipukarea o Tahu Pōtiki  
Tau atu rā ki te tihi o tōku pou tīpua  
Aoraki Matatū, Aoraki Mataoho  
Ka mihi ki ngā maunga, ka mihi ki ngā awa  
Tihei Mauri Ora

Tēnei te mihi ki ngā tātaitanga o te takiwa nei  
Kia tākina te hono kia puawai te kaupapa  
me ngā hua o te Mātāpono ki ū, kia mau  
hui e! Tāiki e

The Kāhu soars the lands of Tahu Pōtiki  
And settles on the summit of my ancestral mountain  
Aoraki Steadfast, Aoraki Vigilant  
It acknowledges all the mountains and rivers  
Behold the essence of life

We acknowledge those with a vested connection to the land,  
who ensure this bond on the collaboration of this document  
and the values within to ensure its longevity  
Together in Unity!

## Message from the Strategy Partners

The Greater Christchurch Partnership continues to demonstrate the cross-agency collaboration and leadership required to effectively plan for and manage urban development across the Greater Christchurch area; working together to address those key strategic issues that span council and political boundaries. Te Tira Tū Tahī - One Group, Standing Together.

Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga represents a further building block to ensure our partnership approach to planning takes account how things have changed in recent years, and what demands and trends might shape the future of our urban areas during the next thirty years. Its particular focus is how best to accommodate housing and business land use needs in a way that integrates with transport and other infrastructure provision, building greater community resilience, and contributing to a sustainable future for Greater Christchurch that meets the needs and aspirations of our existing communities and future generations.

We first recognised the need to undertake this work when we adopted an update to the Greater Christchurch Urban Development Strategy in 2016. This was then reinforced by the development of the National Policy Statement on Urban Development Capacity, which requires councils with high growth urban areas to produce a 'future development strategy' demonstrating there will be sufficient development capacity to meet future needs. Our Space has been collaboratively prepared to satisfy this requirement for Greater Christchurch's councils.

The strategic planning directions contained in this document have been strongly guided by the vision, goals and principles enshrined in the Urban Development Strategy, which continue to provide the roadmap for growth planning in Greater Christchurch. Our Space therefore does not seek to replace this comprehensive strategy, but rather builds on it by considering and updating many of our key settlement pattern matters. Other plans, strategies and initiatives referred to in this document also complement Our Space; helping provide a broader wellbeing approach that ensures Greater Christchurch remains an attractive place for people to live, learn, work, visit and invest.

We would like to acknowledge and thank those that have helped shape this document, and would encourage all to contribute to its implementation and the realisation of our shared vision for the future of Greater Christchurch.

Greater Christchurch has responded to the initial challenges following the earthquakes of 2010 and 2011 and is now embracing the opportunities that lie ahead to help us realise our long term vision - *mō tātou, ā, mō kā uri ā muri ake nei*, for us and our children after us.

A growing urban area can bring future prosperity and enrich our lives and communities, but ~~it needs to be~~ only if it is managed so we protect and enhance the aspects we value the most and that make it a unique place for people to choose to live, learn, work, visit and invest. Greater Christchurch is growing, with the population expected to grow to about 640,000 by 2048, some 150,000 more people than today.

Planning for future urban growth in Greater Christchurch must also be informed and guided by the principles that are relevant to the exercise by *mana whenua* of *kaitiakitanga*. Integral to the exercise of *kaitiakitanga* are the values of respect, reciprocity and sustainability. For *mana whenua*, it is vital that the effects associated with urban growth are managed so as to avoid the degradation of the natural environment – including our coastal environment, waterways and landscapes.

The Greater Christchurch Partnership has worked collaboratively for more than a decade on planning and managing urban growth and development across Greater Christchurch. This Partnership brings together the leadership roles of local government, Te Rūnanga o Ngāi Tahu, the district health board and government agencies and is guided by the vision, principles and strategic goals outlined in the Urban Development Strategy (UDS).

This Update to the UDS addresses various aspects of that Strategy as it:

- focuses on the critical role of how our urban areas accommodate growth and how efficient infrastructure planning can support and guide development decisions;
- reaffirms and builds on existing plans that show we are already well-placed for future development over the next 30 years;
- balances the projected future demands of housing and business markets with the urban form that will best enable sustainable growth;
- recognises that how we live today will be quite different to 30 years from now, so we need to be responsive to these changes, grasping the opportunities afforded by Government policy and emerging technologies to make this transition.

In so doing, this Update demonstrates that there will be sufficient, feasible development capacity<sup>1</sup> in the medium and long term while maintaining an urban form that helps achieve the UDS vision and strategic goals. Two challenges stand out in this regard:

*1. How can future housing provision be affordable, high quality and cater for an aging population that is linked to a more general trend for more one-person and couple-only households?*

*2. And how can our urban areas grow, through redevelopment and new greenfield subdivisions, without increasing the congestion that would ensue if our current travel patterns remain?*

The solutions to these and other challenges will come from a wide range of responses from public agencies, the private sector and communities. Many drivers of change are uncertain, so regular monitoring and review is critical.

This Update outlines the ~~proposed~~ planning framework that integrates and guides other work and demonstrates the commitment of the partners to achieving its strategic goals. It has been informed by an assessment of where we are

<sup>1</sup> Development capacity refers to the amount of land for development enabled in plans and supported by infrastructure. This development capacity can be provided either 'outwards' on greenfield land or 'inwards' by redeveloping existing urban areas (infill and intensification).

now and anticipated future demands, and aligns with recently adopted Long Term Plans and infrastructure strategies of the constituent councils. Specifically it:

- sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people;
- identifies ~~preferred~~ locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi;
- ~~reinforces the role of key centres in providing additional retail and office floorspace as required, in particular the Central City and, if needed, a transition of its surrounding light industrial zones;~~
- promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise
- recognises the existing industrial land provision as sufficient to cater for industrial growth for some time yet;
- outlines a series of implementation actions and further work required to give effect to the Update.

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

Many other plans, strategies and initiatives will complement this Update in improving our wider social, economic, cultural and environmental wellbeing. The ~~draft~~ Canterbury Regional Public Transport Plan (RPTP) ~~proposes~~ contains an ambitious vision to fully integrate the public transport system with the wider transport system and urban form, thereby increasing mobility and accessibility across Greater Christchurch. Development and implementation of recovery and regeneration plans for central Christchurch, the Ōtākaro Avon River Corridor (currently being developed) and Kaiapoi address the future land uses of areas most affected by the earthquakes. Coastal hazards, climate change and Carbon Zero projects are underway to better understand the resilience and adaptation needs of Greater Christchurch. And economic and social enterprise strategies help position the City and the region to thrive and show we are open for business and innovation.

This Update is therefore an important piece of the jigsaw that provides certainty for the sustained and collective investment we can all make to the wellbeing of Greater Christchurch, Our Space.

Commented [MLPC1]: Submission #58

## Contents

## Rārangi Take

### Have Your Say *He Kōrero Āu*

### Executive Summary *Te Whakarāpopototanga*

1. Introduction <i>Kupu Whakataki</i> .....	91
2. Our Place <i>Tō tātou wāhi</i> .....	123
2.1 Context and trends	
2.2 Cultural values and aspirations	
2.3 Greater Christchurch Urban Development Strategy	
2.4 National Policy Statement on Urban Development Capacity	
2.5 Where does this Update fit?	
3. Our Growth Needs <i>Ngā Matea Ngaruru</i> .....	219
3.1 Population and household growth	
3.2 Housing	
3.3 Business	
4. Our Challenges <i>Ngā Taero</i> .....	2815
4.1 Key growth issues for Greater Christchurch	
4.2 Priorities for this Update	
5. Our Plan <i>Te Rautaki</i> .....	339
5.1 Greater Christchurch's settlement pattern	
5.2 Christchurch City	
5.3 Selwyn and Waimakariri towns	
5.4 Land for cultural purposes	
5.5 Sequencing and staging of growth	
5.6 Transport and other infrastructure	
5.7 Why is this our proposed approach?	
6. Our Next Steps <i>Te Anga Whakamua</i> .....	5632
6.1 Responsive planning	
6.2 Further work and implementation	
6.3 Collaborative partnerships	
6.4 Research and monitoring	

### SUPPORTING DOCUMENTS *Ngā Puka Taunaki*

#### A. Greater Christchurch Housing and Business Development Capacity Assessment

#### ~~B. Options assessment – Background information in support of the proposals outlined in this Update~~

## 1. Introduction

## Kupu Whakataki

The Greater Christchurch Partnership<sup>2</sup> has worked collaboratively for more than a decade on planning and managing urban growth and development in Greater Christchurch to support the long term needs of people and communities. This includes the development of the Urban Development Strategy (UDS) in 2007, and the crucial role the Partnership and its constituent partners played coordinating and facilitating rebuild and recovery activities after the earthquakes.

The Partnership ~~has~~ ~~is~~ ~~now~~ ~~reviewing~~ the settlement pattern for Greater Christchurch. This review (referred to as the Settlement Pattern Update or the Update) ~~has been undertaken to satisfy the requirements of the National Policy Statement on Urban Development Capacity (NPS-UDC) for high growth councils to produce a 'future development strategy' that shows there will be sufficient, feasible development capacity to support housing and business growth needs seeks to address the need for housing and business development capacity in Greater Christchurch over the medium~~<sup>3</sup> (next 10 years) and long term (10 to 30 years) ~~periods.~~ (see Section 2.4 for further detail on the NPS-UDC).

A collaborative approach makes sense because the urban areas and the transport networks across Greater Christchurch function as one interconnected system. ~~In doing so, it will satisfy the requirement of the National Policy Statement on Urban Development Capacity (NPS-UDC) for high growth councils to produce a 'future development strategy' that shows there will be sufficient, feasible development capacity to support projected growth needs to 2048.~~ Rather than developing an entirely new strategy the Update builds on the existing UDS to meet the NPS-UDC requirements, and this is encouraged in supporting guidance on implementing the NPS-UDC.

Commented [MLPC2]: Officers reply section 14

This Update comprises a review of the land use framework outlined for Greater Christchurch in the Land Use Recovery Plan and in key resource management documents, such as the Canterbury Regional Policy Statement and district plans. It considers how best to accommodate our future housing and business needs based on the comprehensive strategic planning framework that already exists for Greater Christchurch, being guided by the vision, principles and strategic goals established in the UDS and informed by a Capacity Assessment and relevant Long Term Plans and infrastructure strategies.<sup>4</sup>

Our plan for supporting housing and business growth in Greater Christchurch has been shaped by key considerations relating to planning for sustainable urban development, including how we can:

- achieve our desired urban form while supporting our increasing housing and business needs;
- provide for the diversity of housing that meets the needs of a changing resident population;
- integrate land use and transport planning to ensure we create safe, accessible and liveable urban areas.

To ensure that the processes, priorities and outcomes of this Update align with Ngāi Tahu cultural aspirations for Greater Christchurch, both Te Rūnanga o Ngāi Tahu (as a member of the Partnership) and Ngā Papatipu Rūnanga have been closely involved with the preparation of this document. Particularly significant from a cultural perspective is the need to ensure adequate provision is made for the establishment of kāinga nohoanga settlements in which Ngāi Tahu whānau can live and work on customary Māori land. The Partnership recognises the need for the future role of kāinga nohoanga developments to be important considerations in our planning and decision making processes.

In this context, this ~~draft~~ Update outlines the Partnership's ~~proposed~~ planning directions for supporting urban growth in Greater Christchurch through to 2048. It highlights the key issues in terms of meeting our growth needs, and sets out the Partnership's ~~planned~~ responses to these issues, with the aim of ensuring that Greater Christchurch remains an attractive place for people to live, learn, work, visit and invest, both now and in the future.

<sup>2</sup> The Greater Christchurch Partnership has evolved to comprise Christchurch City Council, Selwyn District Council, Waimakariri District Council, Environment Canterbury, Te Rūnanga o Ngāi Tahu, Canterbury District Health Board, New Zealand Transport Agency, Regenerate Christchurch and the Greater Christchurch Group of the Department of the Prime Minister and Cabinet.

<sup>3</sup> The medium term in this Update includes both the short (next three years) and medium term (between three and 10 years) periods defined by the National Policy Statement on Urban Development Capacity.

<sup>4</sup> Having particular regard to Policy PA1 of the National Policy Statement on Urban Development Capacity.

~~This draft Update has been released for consultation to provide the opportunity for stakeholders and the public to give feedback on our proposed planning responses.~~

~~This feedback will be considered and, where appropriate, incorporated as part of the final document ratified by constituent partner councils.~~

The remainder of this document covers the following:

- Section 2, Our Place, provides the context in which this Update has been developed;
- Section 3, Our Growth Needs, outlines the anticipated housing and business demands, and the extent to which this demand is already provided for in district plans;
- Section 4, Our Challenges, sets out the key issues and challenges that exist when considering our planning responses;
- Section 5, Our Plan, identifies the planning directions and responses that we believe are required to address the key land use and infrastructure issues for Greater Christchurch;
- Section 6, Our Next Steps, signals further work required to implement our planning responses and support our future decision making.

Figure 1: Greater Christchurch area



## 2. Our Place

*Tō tātou wāhi*

### 2.1 Context and trends

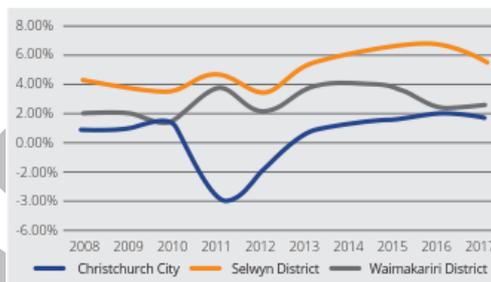
Greater Christchurch is a defined geographical area that includes and surrounds Christchurch City, New Zealand's second largest city and the largest city in the South Island (Figure 1).

Greater Christchurch currently has a population nearing half a million residents. Just under 80% of the Canterbury regional population and about 40% of the South Island population live in Greater Christchurch, emphasising its importance as a strategic regional centre and the primary economic hub of the South Island. Canterbury is the fastest growing region in New Zealand outside Auckland and more population growth is projected in Greater Christchurch over the next 30 years than other high growth cities, such as Hamilton, Tauranga, Wellington and Queenstown.

Administratively, Greater Christchurch comprises parts of three territorial authorities: Christchurch City, Selwyn District and Waimakariri District. The communities and economies in these areas are intrinsically linked environmentally by the rivers, groundwater systems, coastal and other natural features that cross territorial authority boundaries, and by infrastructure, with large numbers of people commuting to work in the City, and facilities and services provided in one district often benefitting neighbouring communities.

The larger towns in Selwyn and Waimakariri that fall within Greater Christchurch include Rolleston, Rangiora, Kaiapoi and Lincoln, while smaller settlements include West Melton, Prebbleton, Tai Tapu, Springston, Tuahiwi, Woodend and Pegasus. Lyttelton and its harbour, Whakaraupō, also fall within the defined boundaries for Greater Christchurch, although the rest of Banks Peninsula does not.

Figure 2: Annual population growth rates



The Canterbury earthquake sequence in 2010 and 2011 had a significant impact on Greater Christchurch's population and employment. As shown in Figure 2, the population in Christchurch City dropped sharply in the first two years after the earthquakes and recovered to its pre-earthquake population only in 2017. In contrast, Selwyn and Waimakariri have experienced strong population growth since the earthquakes, augmenting the high growth rates seen in the two districts prior to the earthquakes.

The widespread earthquake damage to infrastructure networks and housing areas, especially in the Central City, the eastern areas of the City and in the Kaiapoi area, required many households to find new places to live. Much of this post-earthquake demand was supported by opening new housing areas that had been planned to meet longer term growth needs. Although the development around the urban fringes of the City and the larger towns in Selwyn and Waimakariri has occurred at a faster rate than anticipated at the time the UDS was conceived, it has still been consistent with the longer term growth strategy for Greater Christchurch.

The earthquakes also damaged business premises in Greater Christchurch, especially in the central and eastern parts of the City, with many businesses forced to relocate either temporarily or, in some cases, permanently. Continued momentum behind the Central City recovery has meant businesses and workers are returning to this area, helping to restore the central business district as the principal commercial hub for the region. Employment levels in the Central City ~~continue to increase but are not yet back to levels that existed prior to the earthquakes, are again nearing those attained prior to the earthquakes.~~

Commented [MLPC3]: Submission 077

Changes to the spatial distribution of housing and business activities in Greater Christchurch, coupled with the damage to roads and other infrastructure from the earthquakes, have had substantial impacts on the transport network. This includes altered travel patterns that have resulted in increased traffic volumes originating from the west of the City, as well as from Selwyn and Waimakariri. This has placed more demand on the road network along the western corridor, as well as on the northern and southern approaches to the Central City. Over the past decade there has been significant investment in the Greater Christchurch roading network, which has helped accommodate this demand. Investment has included the building of the Christchurch Southern Motorway Stage 1, Western Belfast Bypass and four-laning of the State Highway 1 Western Corridor (between Hornby and Belfast). The Christchurch Southern Motorway Stage 2 (between Halswell Junction Road and Rolleston), and the Christchurch Northern Corridor are under construction and expected to be fully operational by 2021.

Disruptions to land use, the transport network, and travel patterns have led to increased travel by car and contributed to reduced public transport patronage in Greater Christchurch. However, with a growing number of businesses and workers returning to the Central City, the share of trips taken by public transport in Greater Christchurch is expected to grow, while major investment in the urban cycleway network continues to encourage active transport choices.

DRAFT

## 2.2 Cultural values and aspirations

The Greater Christchurch area is an outstanding cultural landscape for Ngāi Tahu whānui. It is the hapū of Te Ngāi Tūāhuriri, Ngāti Wheke (Rāpaki) and Taumutu Rūnanga who hold mana whenua over this cultural landscape. Integral to its role as mana whenua is the inherited responsibility bestowed upon mandated individuals to act as kaitiaki, and to ensure that the principles of respect, reciprocity and sustainability are adhered to when making decisions that affect the environment in the area.

Central to the role and responsibilities of kaitiakitanga is the holistic concept known as Ki Uta Ki Tai (from the mountains to the sea). The concept of Ki Uta Ki Tai maintains that each of the constituent components of the natural environment are interconnected, and that an action in one location will have a flow on effect and impact on another location.

The concept of Ki Uta Ki Tai can apply equally to the built environment whereby decisions that we make about future urban growth will have repercussions for associated infrastructure and service requirements. Accordingly, this Update has sought to adopt an integrated and holistic approach that recognises the interconnected nature of the Greater Christchurch environment.

Contained within the Greater Christchurch cultural landscape is a mosaic of values, many of which date back to time immemorial and which serve as tangible reminders of the intergenerational relationship that Ngāi Tahu Whenua share with the natural environment. In preparing this Update, the Partnership recognises that decisions we make about the future spatial distribution of housing and business activities in Greater Christchurch must align with traditional and contemporary cultural values. These values include:

- Wāhi ingoa (place names), which often represent people, historical events, geographical features and Natural flora and fauna;
- Ara tawhito (traditional trails), which were the arteries of important social and economic relationships;
- Ngā wai, which are the freshwater resources that are the life blood of Papatūānuku (Earth Mother) and the life giver of all things;
- Mahinga kai, which encompasses the customary (and contemporary) gathering of food and natural materials, and the places where these are gathered from;
- Mauri, which encompasses the essence that binds the physical and spiritual elements of all things together, generating and upholding life;
- Wāhi tapu and wāhi taonga sites, which includes both archaeological sites and natural features, and species that are sacred, treasured and revered by Ngāi Tahu whānui.

The key principles that govern the manner in which these values are to be managed are set out in the Mahaanui Iwi Management Plan. The Mahaanui Iwi Management Plan is an expression of kaitiakitanga and rangatiratanga, and contains detailed policies that reflect the kaupapa of Ngāi Tahu whānui in respect of the management of natural and physical resources.

Although much of the cultural landscape that encompasses the Greater Christchurch area is now highly modified, its significance to Ngāi Tahu whānui is in no way diminished. The many traditional values that attach themselves to the cultural landscape maintain a contemporary significance. To this end, the preparation of this document has been undertaken in close partnership with both Te Rūnanga o Ngāi Tahu (as a member of the Partnership) and Ngā Papatipu Rūnanga who hold mana whenua over Greater Christchurch.

It is important to record that, for Ngāi Tahu, subdivision and land use change can increase the potential for effects on sites and areas of cultural significance. These effects may be concerned with land disturbance and the introduction of activities which are inappropriate in close proximity to, or causing the displacement or loss of wāhi tapu or wāhi taonga values. In addition, intensification of the built environment may increase demand for water supply, wastewater and stormwater disposal, adversely affecting surface and groundwater resources.

## 2.3 Greater Christchurch Urban Development Strategy

The Urban Development Strategy (UDS) was produced by the Partnership in 2007 to provide the strategic direction for urban growth in Greater Christchurch. It promotes an integrated and intergenerational approach to planning for urban growth, and seeks to ensure that development is managed in a manner that protects environments, improves transport links, creates liveable areas and sustainably manages population growth. Formed after extensive consultation, the UDS seeks to consolidate development in and around well-defined urban and rural town centres.

The vision, principles and strategic goals in the UDS<sup>5</sup> continue to guide the Partnership's approach to enabling future growth, and have helped to shape the planning directions proposed in this Update.

### Vision (kaupapa)

*Greater Christchurch has a vibrant inner city and suburban centres surrounded by thriving rural communities and towns, connected by efficient and sustainable infrastructure.*

*There is a wealth of public spaces ranging from bustling inner city streets to expansive open spaces and parks, which embrace natural systems, landscapes and heritage.*

*Innovative businesses are welcome and can thrive, supported by a wide range of attractive facilities and opportunities.*

*Prosperous communities can enjoy a variety of lifestyles in good health and safety, enriched by the diversity of cultures and the beautiful environment of Greater Christchurch.*

<sup>5</sup> An update of the UDS in 2016 retained the vision for Greater Christchurch but revised the principles and strategic goals from the 2007 UDS to reflect the changes that had occurred since the earthquakes.

### Principles and strategic goals (whainga)

The principles and strategic goals of the UDS expand on the vision by describing the key outcomes we seek to achieve under four themes: healthy communities, enhanced natural environments, prosperous economies and integrated and managed urban development. Given the emphasis of this Update on spatial planning matters, particular regard has been given to the strategic goals related to 'integrated and managed urban development', while also recognising the broader contribution that quality urban environments can bring to our overall quality of life.

Figure 3: UDS principles, themes and relevant strategic goals



## 2.4 National Policy Statement on Urban Development Capacity

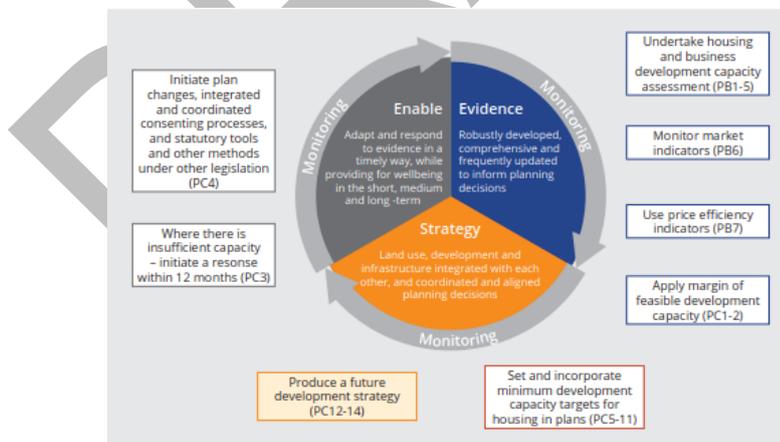
The National Policy Statement on Urban Development Capacity (NPS-UDC) came into effect in December 2016, providing direction to decision-makers under the Resource Management Act 1991 in respect of planning for urban environments. It requires all councils that have part, or all, of a medium or high growth urban area within their district or region to produce a future development strategy which demonstrates that sufficient, feasible development capacity is available to support future housing and business growth. This includes over the medium (next 10 years) and long term (10 to 30 years) periods.

The Christchurch urban area<sup>6</sup> was defined by Statistics NZ in 2016 as a high growth urban area. Given the strategic planning arrangements that already exist between councils in Greater Christchurch through the Partnership, it was agreed that a review of Greater Christchurch's settlement pattern should be done collaboratively, and in doing so, meet the statutory requirements of the NPS-UDC. Accordingly, the Partnership has determined that the Greater Christchurch area shown in Figure 1 should be the geographic area of focus for the Update and the relevant urban environment for the purposes of the NPS-UDC requirements. This Update therefore meets the requirements of Policies PC12 and PC13 of the NPS-UDC (related to producing a 'future development strategy') by:

- demonstrating that there will be sufficient, feasible development capacity over the medium and long term;
- identifying the broad location, timing and sequencing of future development capacity in new urban environments and intensification opportunities within existing urban environments;
- balancing the certainty regarding the provision of future development with the need to be responsive to demand for such development;
- being informed by a Capacity Assessment, the relevant Long Term Plans and Infrastructure Strategies required under the Local Government Act 2002, and any other relevant strategies, plans and documents;
- having particular regard to NPS-UDC Policy PA1.

To inform the spatial planning decisions outlined in this Update, the Partnership has developed an evidence base that provides information about current and future housing and business trends in Greater Christchurch. This has included monitoring urban development indicators and preparing a Housing and Business Development Capacity Assessment<sup>7</sup>, which are both required by the NPS-UDC.

Figure 4: NPS-UDC policies and their interrelationship



<sup>6</sup> The Christchurch urban area is identified by Statistics NZ as including the towns of Prebbleton in Selwyn and Kaiapoi in Waimakariri.

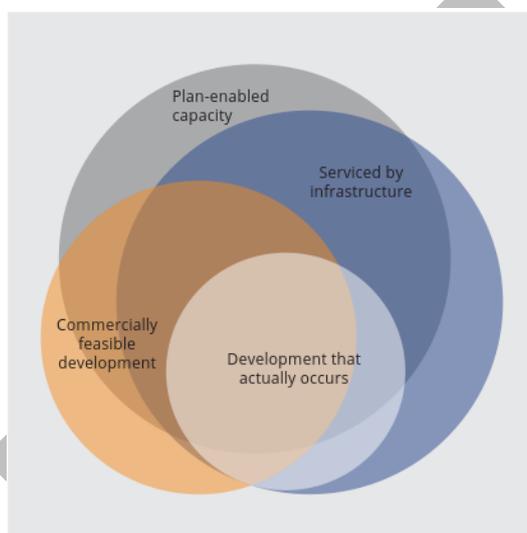
<sup>7</sup> The Urban Development Indicators Monitoring Reports and Capacity Assessment produced by the Partnership can be accessed at [www.greaterchristchurch.org.nz](http://www.greaterchristchurch.org.nz).

The Capacity Assessment estimates the demand for and supply of housing and business land to indicate whether there is sufficient, feasible development capacity currently planned in Greater Christchurch to meet our growth needs for the next 30 years.

In undertaking this work, the NPS-UDC requires councils to estimate the sufficiency of development capacity to meet future demand taking into account relevant regional and district plan provisions, actual and likely availability of development infrastructure, the current feasibility and rate of take up of capacity, and the market response in terms of what has been built, where this has occurred and at what price.<sup>8</sup>

This Update summarises the findings of the Capacity Assessment, identifies any sufficiency issues and provides our planning and policy response.

Figure 5: Aspects of development capacity



## 2.5 Where does this Update fit?

### National context

This Update has been prepared within the legislative context of the Resource Management Act 1991, Local Government Act 2002 and Land Transport Management Act 2003. It has also been undertaken at a time when the Government is strengthening its approach to urban development and regional economic growth, and reviewing the mix of instruments available to effect change in New Zealand's cities. This includes a review of how local government can effectively finance infrastructure improvements to support future growth, which is a critical challenge facing most high growth urban areas.

The Urban Growth Agenda is the Government's response to the challenges confronting New Zealand's cities, especially in terms of worsening housing affordability. It seeks to address the fundamentals of land supply, development capacity and infrastructure provision by removing any undue constraints, with the initial focus of the programme on:

- enabling responsive infrastructure provision and appropriate cost allocation;

<sup>8</sup> Requirement of Policy PB3 of the NPS-UDC.

- enabling strategic planning to increase development opportunities and support quality built environments;
- building stronger partnerships between local and central government as a means to undertaking pro-growth and integrated spatial planning;
- ensuring the price of transport infrastructure promotes access to the network and efficient urban form; and
- ensuring the regulatory, institutional and funding settings under the Resource Management Act, Local Government Act and Land Transport Management Act are collectively supporting the objectives of the Urban Growth Agenda.

The Government's commitment to this Urban Growth Agenda has been reinforced by the creation of a new Ministry of Housing and Urban Development. There are also important interdependencies between the Urban Growth Agenda and other Government initiatives, such as establishing a national Urban Development Authority, the Kiwibuild programme to build 100,000 affordable homes for first time buyers, the Housing First programme to house and support people who have been homeless for a long time and face multiple needs, the Public Housing Plan to increase the supply of social housing and proposed changes to the Residential Tenancies Act 1986 to improve the conditions for people renting.

The new Government Policy Statement on Land Transport (GPS) has also influenced this Update. The GPS makes clear that the transformation of the land transport system is a priority for the Government, signalling its commitment to:

- a mode neutral approach to transport planning and investment;
- incorporating technology and innovation into the design and delivery of land transport investment;
- integrating land use and transport planning and delivery.

Future updates to the GPS are likely to seek to establish local and central government agreements on transport's role in the future development of metropolitan areas such as Greater Christchurch. It will consider the role of transport as an enabler, connector and shaper of New Zealand's cities, and opportunities for investment in rapid transit options (e.g. light rail and dedicated bus routes) to support transit-oriented development in major urban areas.

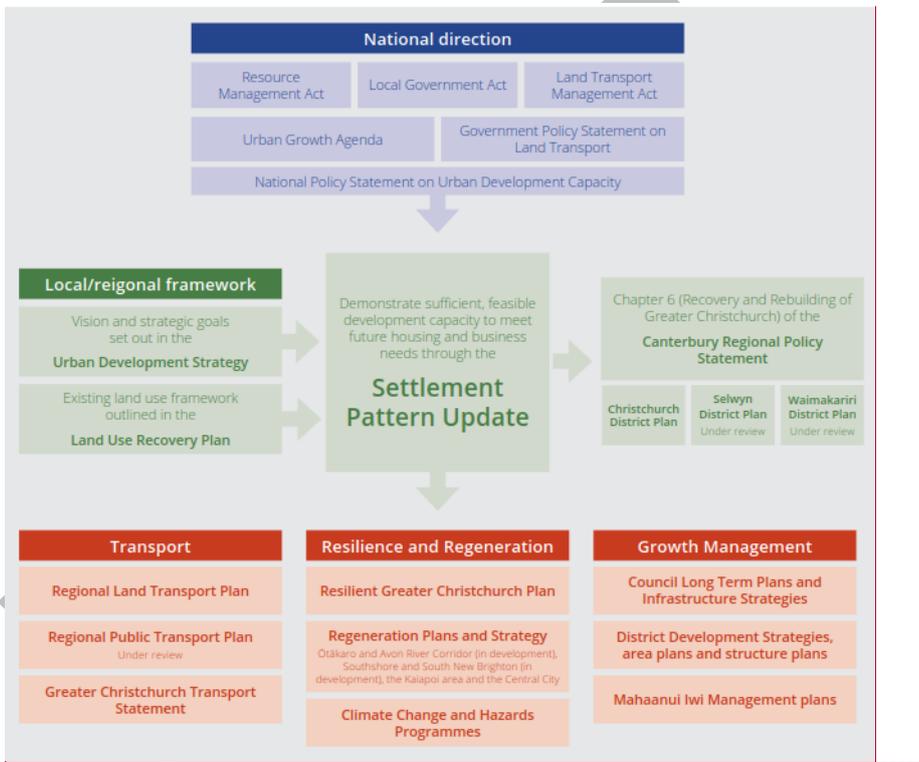
Other considerations at the national level include the emerging National Policy Statement on Versatile Land and High Class Soils and the Zero Carbon Bill, with the latter aiming to achieve net zero emissions in New Zealand by 2050.

**Local and regional context**

A range of plans, strategies and programmes have been developed, or are being developed, at the local and regional level that will influence how Greater Christchurch grows and changes in the future. It is important this Update aligns and integrates with these initiatives to support a cohesive approach to planning. Key considerations encompass transport plans, regeneration plans and strategies, health programmes, climate change and hazard management programmes, and other plans, strategies and programmes being delivered by councils and iwi in relation to growth management.

The implementation of some of the planning responses ~~proposed~~ in this Update will also require changes to resource management documents, including to the Canterbury Regional Policy Statement and district plans for Christchurch City, Selwyn and Waimakariri. This will involve, at a minimum, the insertion of housing targets for each local authority.

Figure 6: National, regional and local context for the Settlement Pattern Update



**Commented [MLPC4]:** Remove *Under review* from RPTP and *in development* in relation to OARC

### 3. Our Growth Needs

### Ngā Matea Ngaruru

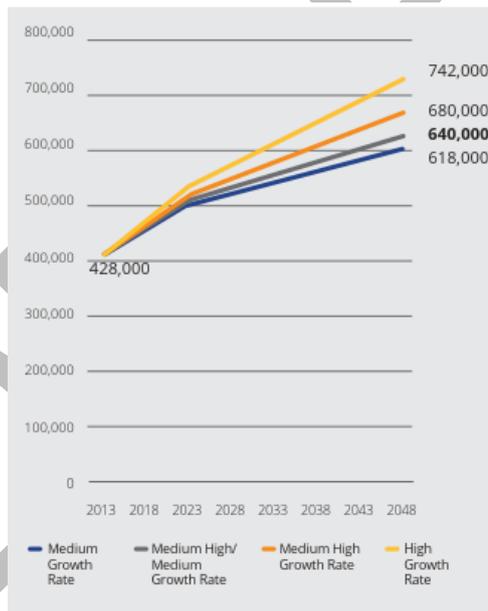
Guidance produced by the Ministry for the Environment and the Ministry of Business, Innovation and Employment to help councils meet the evidence and monitoring policies of the NPS-UDC acknowledges that the 'future is inherently uncertain and impossible to accurately predict, especially over the long term'.<sup>9</sup>

#### 3.1 Population and household growth

The risks associated with planning for an uncertain future can be managed by utilising the most up-to-date and robust population and household projections, and considering possible growth scenarios. In this way, Statistics NZ provides three possible projection scenarios: low, medium and high growth. As shown in Figure 7, the variances in these scenarios are relatively high for the territorial authorities in Greater Christchurch, partly due to the disruptions and associated uncertainties created by the Canterbury earthquake sequence in 2010 and 2011.

Statistics NZ's projection scenarios were considered against historic trends and local circumstances to determine the most appropriate scenario to adopt for each territorial authority, and consequently for Greater Christchurch. These provide estimates of the demand for housing (and indirectly for business land) over the medium (next 10 years) and long term (10 to 30 years).

Figure 7: Population growth scenarios for Greater Christchurch



To reflect the recent growth trends in Greater Christchurch, the Partnership agreed to adopt the medium projection for Christchurch City, and the medium-high projection for both Selwyn and Waimakariri, as the basis for the Housing and Business Development Capacity Assessment. This approach sought to balance a desire to be 'ahead of the curve' when planning for growth, with ensuring that the financing and provision of new infrastructure is timely to support future growth needs. It is possible, should local trends and circumstances change, that subsequent Capacity Assessments adopt different projection scenarios for Greater Christchurch.

<sup>9</sup> National Policy Statement on Urban Development Capacity: Guide on Evidence and Monitoring, June 2017, p26

Based on the adopted scenario, the population in Greater Christchurch is projected to grow to about 640,000 by 2048, being 150,000 more residents than in 2018. As outlined in *Table 1*, this population growth translates to about 74,000 new households in Greater Christchurch by 2048, with 54% of this growth in Christchurch City, 28% in Selwyn and 18% in Waimakariri.

Although not specifically planned for as part of this Update, the Canterbury Regional Economic Development Strategy suggests the need for net migration in the Canterbury region to be higher than historic rates to help sustain a strong regional economy. Should new policy settings be adopted by the Government in the effort to achieve more aspirational population growth either nationally or regionally, the Partnership would need to consider the implications of an even higher growth scenario as part of future updates and reviews of the UDS.

## 3.2 Housing

### Demand

Based on the adopted growth scenario for Greater Christchurch, projected population and household growth will generate demand for about 74,000 new dwellings over the next 30 years. When the margins (or buffers) required by the NPS-UDC are added to this housing demand, the number of new dwellings that need to be planned for in Greater Christchurch increases to almost 87,000, as set out in *Table 2*.<sup>10</sup> These margins provide flexibility to allow for situations when developments are not brought to the market, meaning extra development capacity is required to ensure future needs are met.

*Table 1: Projected Housing Demand in Greater Christchurch, 2018 – 2048*

	Medium Term (2018 - 2028)	Long Term (2028 - 2048)	Total 30 Year Period
Christchurch City	14,500 (17,400)	25,200 (29,000)	39,700 (46,400)
Selwyn	7,200 (8,600)	13,500 (15,600)	20,700 (24,200)
Waimakariri	5,200 (6,300)	8,400 (9,700)	13,600 (16,000)
<b>Greater Christchurch</b>	<b>26,900 (32,300)</b>	<b>47,100 (54,300)</b>	<b>74,000 (86,600)</b>

Note: Bracketed numbers include the additional planning margins required by NPS-UDC Policies PC1 to PC4. Numbers have been rounded to the nearest 100.

A comprehensive assessment of the future housing demand profile for Greater Christchurch was commissioned as part of the Capacity Assessment<sup>11</sup>, and revealed common trends likely for Christchurch City, Selwyn and Waimakariri over the next 30 years. Of significance are the projected increases in the elderly population and decreases in the average household sizes across Greater Christchurch, and the implications of these changes for the types of dwellings required to meet future needs.

While standalone homes on large sections will continue to make an important contribution towards meeting future housing demand, the shifting demographic and household profile in Greater Christchurch means a growing share of demand is expected to be met by smaller housing types, such as apartments and townhouses. Much of the growing demand for smaller housing types will be focused in the City and provided through the private rental market, while some demand for such housing types will also be evident in the larger towns in Selwyn and Waimakariri by 2048.

Due to the close location of Christchurch City, Selwyn and Waimakariri, these local housing markets share a number of similarities, for example three to four bedroom dwellings make up about two thirds of the overall housing stock for each territorial authority.<sup>12</sup> Although some demand for housing will be transferable between these local markets, this is not always the case given individuals and families make decisions on where they want to live based on their own needs and wants at the time of buying a house. Such factors include lifestyle, and proximity to amenities, education

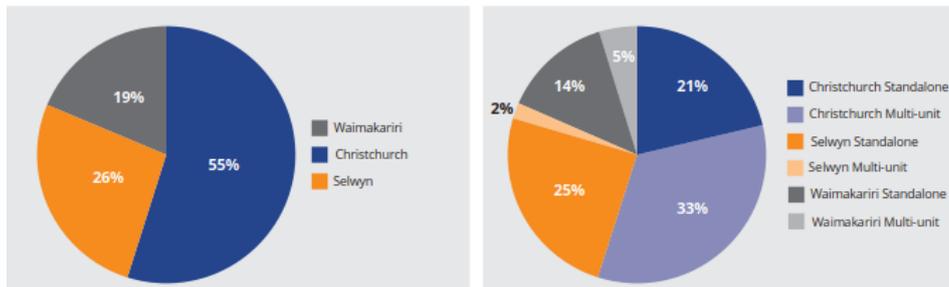
<sup>10</sup> Margins include an additional 20% over the medium term and 15% over the long term as outlined in Policies PC1 to PC4 of the NPS-UDC.

<sup>11</sup> Livingston Associates, Housing Demand in Greater Christchurch, November 2017

<sup>12</sup> Census 2013: Number of bedrooms for occupied private dwellings in Christchurch City, Selwyn and Waimakariri.

and employment. In the future, these factors are also likely to alter due to demographic changes, meaning the three housing markets will need to adapt to the changing profile of future housing demand.

Figure 8: Housing demand by Council area and housing type across Greater Christchurch



What key factors will influence our future and changing housing demand profile?

↑	<b>Increase in the share of households with aged 65 years +</b> Projected to grow from currently 24% to 35% in 2048	
↑	<b>Growth in single person households</b> Number of households projected to increase by 50% by 2048	↑ <b>Growth in multi-person households</b> Number of households projected to increase by 30% by 2048
↓	<b>Smaller average household sizes</b> Household sizes projected to decrease from 2.5 to 2.4 in the City, 2.9 to 2.6 in Selwyn and 2.6 to 2.4 in Waimakariri	↓ <b>Decrease in home ownership rates</b> 71% of housing demand in the City will be met by private rentals, 33% in Selwyn and 36% in Waimakariri
%	<b>Share of housing demand likely to be met by multi-unit dwellings</b> 60% of housing demand in the City, 7% in Selwyn and 25% in Waimakariri	% <b>Share of all new households that will need housing under \$350,000 to buy or \$200/week to rent to be affordable</b> 62% of new <u>housing households</u> in the City, 35% in Selwyn and 58% in Waimakariri
↑	<b>Increase in share of households with a long term health condition or disability</b>	

Commented [MLPC5]: Submission #82

Commented [MLPC6]: Submission #58

## Targets

The NPS-UDC directs councils to set minimum targets for housing development capacity for both the medium and long term periods. These targets are informed by the projected demands for housing identified in the Capacity Assessment. Through this Update, Councils need to demonstrate how sufficient, feasible development capacity will be provided and serviced to accommodate the number of new dwellings planned for each territorial authority over these periods and set out how these targets will be met.

Having considered the most appropriate housing targets for Greater Christchurch, the Partnership believes that targets that simply duplicate the projected demands for each territorial authority would not take account of our unique post-earthquake circumstances, and over the longer term, may not align with the strategic goals of the UDS to increasingly support growth by redeveloping and intensifying existing urban areas.

However, the development trends that currently characterise Greater Christchurch will also not change overnight, with the market and people's preferences needing time to respond to the new opportunities being created by regeneration and place-making initiatives underway in the Central City, suburban centres and surrounding local neighbourhoods in Christchurch City.

The ~~proposed~~ targets for housing development capacity therefore represent a transitional approach that align with projected demands over the medium term, but allow for a greater share of new households in Greater Christchurch to be supported through redevelopment in the City over the long term.<sup>13</sup> The regional targets for Greater Christchurch correspond to projected demand, it is only the territorial authority apportionment of these targets over the long term that represents a transitional approach.

In this context, the targets set out in Table 2 for Christchurch City, Selwyn and Waimakariri represent the development capacity that each council will, ~~over the medium term, zone and otherwise, seek to~~ enable through their relevant planning processes and mechanisms (district plans, structure plans, outline development plans and infrastructure strategies) ~~and over the long term, identify in relevant plans and strategies,~~ to meet the demand for housing in Greater Christchurch over the medium and long term.<sup>14</sup> ~~A change to the Canterbury Regional Policy Statement in 2019 will include a policy that will enable land required to meet an identified medium term capacity need to be rezoned in district plans. Unless already enabled, additional development capacity required over the long term will only be shown on Map A of the Regional Policy Statement as a Future Development Area, identified in relevant plans and strategies, and the development infrastructure<sup>15</sup> required to service it will be identified in each council's infrastructure strategy.~~

**Commented [MLPC7]:** Submission #3 and Theme 5 recommendation 1

These targets will need to be revisited every 3 years following the completion of scheduled Capacity Assessments.

Table 2: Targets for Housing Development Capacity in Greater Christchurch, 2018 - 2048

	Medium Term (2018 - 2028)	Long Term (2028 - 2048)	Total 30 Year Period
Christchurch City	17,400 (54%)	38,550 (71%)	55,950 (65%)
Selwyn	8,600 (27%)	8,690 (16%)	17,290 (20%)
Waimakariri	6,300 (19%)	7,060 (13%)	13,360 (15%)
<b>Greater Christchurch</b>	<b>32,300</b>	<b>54,300</b>	<b>86,600</b>

Note: Figures included in the table represent number of dwellings. Bracketed figures represent the share of dwellings for that period.

### Sufficiency

Collectively, the district plans for Christchurch City, Selwyn and Waimakariri already allow for a substantial number of new dwellings to be built in and around their urban areas. This development capacity is provided through greenfield housing areas (new subdivisions) and the redevelopment of existing housing areas. Some additional capacity also exists in rural locations surrounding the main towns in Selwyn and Waimakariri. Most of the capacity in Greater Christchurch is currently provided in the City, with only about 13% provided in Selwyn and 6% in Waimakariri.

The Capacity Assessment included extensive work to assess the commercial feasibility of housing development capacity in Greater Christchurch. This work highlighted that assessing feasibility can be extremely complex and that further work is required to better understand and then respond to the challenges of improving feasibility, especially in relation to the redevelopment market. Key areas for further investigation include understanding the influences on and

<sup>13</sup> The longer term share of new households to be provided within Christchurch City reflects those outlined in the UDS 2007.

<sup>14</sup> Table 2 will be inserted into the Canterbury Regional Policy Statement in Chapter 6 (Recovery and Rebuilding of Greater Christchurch). Relevant local authority targets will also be inserted into the district plans for Christchurch City, Selwyn and Waimakariri.

<sup>15</sup> Development infrastructure means network infrastructure for water supply, wastewater, stormwater, and land transport as defined in the Land Transport Management Act 2003, to the extent that it is controlled by local authorities, and including New Zealand Transport Agency.

of land values, sales prices and build and land development costs, and how these factors could change over time to improve the relative feasibility of housing developments.

In this context, the feasibility tests undertaken as part of the Capacity Assessment produced a wide range of results for Christchurch City, Selwyn and Waimakariri depending on the adopted set of assumptions and inputs. Further work to improve the modelling tools used for Capacity Assessment findings will occur as part of the next assessment in 2020 reported in this Update is underway.

Based on the housing targets, the overall amount of feasible housing development capacity in Greater Christchurch is sufficient to meet demand over the medium term. However there is insufficient development capacity in certain locations within Greater Christchurch in the medium term and overall when you consider the long term housing demand.

At the territorial authority level, given the range of reported feasibility, capacity in Selwyn and Waimakariri may not be sufficient to meet demand over the medium term, while the significant capacity in the City is expected to be sufficient over the next 30 years, even with a higher share of growth apportioned to the City over the long term period (see Table 3).

These projected shortfalls in housing development capacity must be resolved to enable our urban areas to develop and change, and respond to the needs of both current and future generations. How the Partnership proposes will to respond to the projected capacity shortfalls in Greater Christchurch is addressed in Sections 5 and 6.

Table 3: Sufficiency of Housing Development Capacity in Greater Christchurch against Housing Targets, 2018 - 2048

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity *	
			Medium Term (2018 - 2028)	Medium and Long Term (2018 - 2048)
Christchurch City	59,950 *	55,950	+ 38,875	+ 4,000
Selwyn	9,725 **	17,290	+1,125+1,825 ***	-7,575-5,475 ***
Waimakariri	4,200 **	13,360	-2,100-1,600 ***	-9,175-7,675 ***
<b>Greater Christchurch</b>	<b>73,875</b>	<b>86,600</b>	<b>+37,900+39,100 ***</b>	<b>-12,750-9,150</b>

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

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

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

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

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

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

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

Further and ongoing refinement of the feasibility tools will be undertaken by constituent partner councils and incorporated as part of the next capacity assessment due in 2020. This assessment will also benefit from more up-to-

date data and can be used as the basis for making any zoning changes to address development capacity shortfalls as part of the District Plan Reviews for Selwyn and Waimakariri.

### 3.3 Business

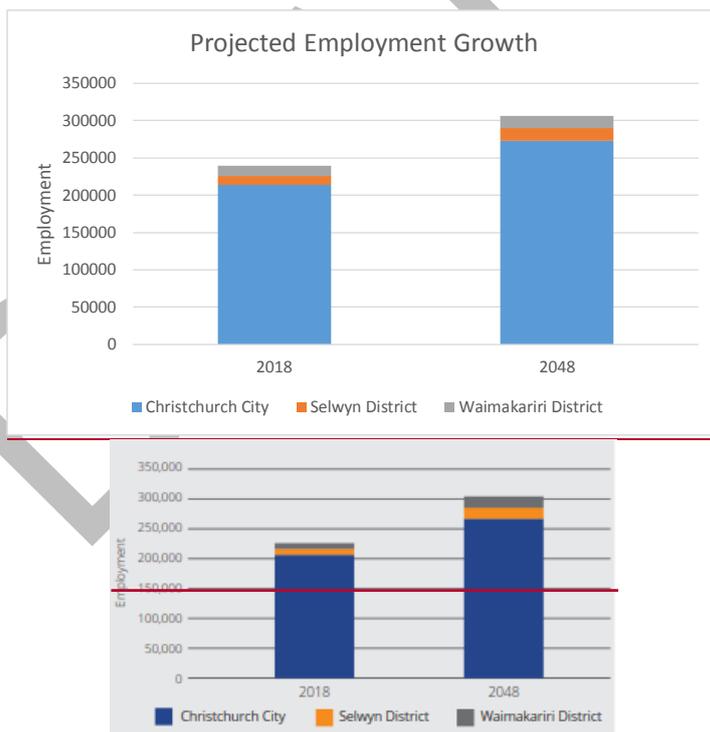
#### Demand

Significant business growth is projected in Greater Christchurch over the next 30 years. This increase is driven predominantly by population and household growth and consequently the highest growth sectors are those providing retail goods (contributing 17% of employment growth), health/education (contributing 42% of growth) and services (19% of growth)<sup>16</sup>. Given the strong population growth driver, the structure and quantum of employment growth projected by the Capacity Assessment could be different if the population growth projected by Statistics NZ does not eventuate.

The tourism sector is also expected to contribute to a significant proportion of the growth over the period (accommodation contributing 16% of growth) whilst employment in the primary and industrial sectors is expected to remain relatively stable, contrasting with historic negative trends observed for these sectors.

In total, an additional ~~71,000~~ **67,000** employment opportunities are projected by 2048, with most of these located within Christchurch City (~~88~~ **89**%) and creating additional demands for land and floorspace.

Figure 9: Projected employment growth



<sup>16</sup> Greater Christchurch Housing and Business Capacity Assessment (2018)

## Sufficiency

The Christchurch City, Selwyn and Waimakariri district plans already make generous provision for meeting the long term needs for industrial land, and future commercial space is also mostly provided for, at least over the medium term.<sup>17</sup> Over the longer term, the Capacity Assessment identifies potential shortfalls in commercial space, notably in areas projected to experience significant residential growth, including the Central City, the south-west and north-west parts of the City, and the main centres in Selwyn and Waimakariri.

The sufficiency of industrial and commercial development capacity to meet projected demand is shown in Table 4.

Table 4: Sufficiency of Industrial and Commercial Development Capacity in Greater Christchurch, 2018 – 2048

	Sufficiency of Industrial Development Capacity		Sufficiency of Commercial Development Capacity	
	Medium Term (2018 - 2028)	Medium and Long Term (2018 - 2048)	Medium Term (2018 - 2028)	Medium and Long Term (2018 - 2048)
Christchurch City	+ 675665	+ 225200	+ 4530	- 120135
Selwyn	+ 215205 to + 245230	+ 190 to + 220	- 5 to + 5	- 3020 to - 2010
Waimakariri	+ 4060 to + 90110	+ 545 to + 6095	- 540 to + 1015	- 155 to + 010
<b>Greater Christchurch</b>	<b>+ 930 to + 1,010</b>	<b>+ 420 to + 505</b>	<b>+ 30 to + 60</b>	<b>- 165 to - 140</b>

Note: Figures included in the table represent land in hectares (rounded to the nearest 5 hectares from the Capacity Assessment). Ranges reflect the uncertainty that additional demand for business land and floorspace can be accommodated by under-utilised business land. Commercial development capacity includes both commercial office land and commercial retail land.

Business land is inherently more flexible than housing land, with a wide range of business uses enabled on most business sites. As a consequence, the Capacity Assessment identified that most industrial and commercial zoned land in Greater Christchurch was commercially feasible for at least one type of business use. Given that longer term demands for business space can be affected by a wide range of factors, regular monitoring and review of uptake and other market indicators, as well as sensitivity testing of modelled assumptions, will be important to confirm actual levels of demand and ensure appropriate planning responses are made at the necessary times.

<sup>17</sup> Reference to commercial space includes both commercial office space and commercial retail space.

## 4. Our Challenges

## Te reo Ngā Taero

### 4.1 Key growth issues for Greater Christchurch

Arising from the context outlined in Section 2 and the evidence base from the Capacity Assessment summarised in Section 3, the Partnership recognises that there are some key issues that need to be considered as part of ~~developing~~ our ~~proposed~~ planning directions and responses. These key issues for Greater Christchurch are discussed below.

#### Delivering new dwellings through redevelopment and intensification

Delivering higher density housing is essential to supporting the needs and preferences of a growing share of the population, and for achieving the consolidated urban form that most effectively accommodates growth. Although the uptake of redevelopment opportunities in Greater Christchurch is not yet back to pre-earthquake levels, the scale of redevelopment has started to trend upwards and is getting close to the intensification targets set in the UDS and Chapter 6 of the Canterbury Regional Policy Statement. To unlock further redevelopment opportunities, the new Christchurch District Plan has 'up-zoned' areas to allow for medium and high density housing redevelopments, and streamlined consenting approval processes. However, there are challenges to delivering redevelopment in Greater Christchurch requiring the development sector to be appropriately supported to help bring such developments to the market and ensure the rate of new dwellings delivered through intensification strengthens.

#### Meeting housing needs and preferences for current and future residents

In comparison to other New Zealand cities, the cost of housing in Greater Christchurch is relatively affordable, however the provision of social and affordable housing will become an increasingly critical issue. Enabling higher density housing developments at different price points will be vital to meeting the projected increase in demand for smaller, more affordable dwellings. District plan provisions play an important role in helping to deliver a broad range of housing types, while other targeted programmes by constituent partner councils aim to support the development sector in delivering higher density housing to the market. Public sector investment can also play a role in boosting the attraction of areas for such developments, especially in the Central City, key activity centres and district town centres.

#### Recognising post-earthquake trends and anticipating future drivers

Since the earthquakes in 2010 and 2011, the location and pace of housing and population growth have been different to that anticipated at the time the UDS was produced in 2007. The increasing uptake of redevelopment in Christchurch City during the 2000s has since slowed, while development of greenfield land enabled by the Land Use Recovery Plan (LURP) has been advanced rapidly. These trends partly reflect the unique situation in which a significant number of households had to be urgently reaccommodated following the earthquakes. A key challenge is therefore to understand whether the demands driving these trends will continue in the future or shift back to pre-earthquake trends, and whether any policy intervention will be required. This highlights the importance of both monitoring, to understand any key changes, and the role of planning and policy directions in this Update to enable the market to meet future demands.

#### Integrating land use and transport planning to shape desired urban form

Integrated land use and transport planning is a key principle that underpins the strategic direction for urban growth in Greater Christchurch. However, the key challenge of achieving sufficient and equitable infrastructure funding remains. In this context, the Government Policy Statement on Land Transport (GPS) has offered new opportunities for investing in our transport system, with the possible development of a local and central government agreement on transport's role in the future development of Greater Christchurch signalled in the GPS. Discussions with the Government and infrastructure providers will be important in delivering the types of improvements to our transport network that will help enable our desired urban form. Aligning development with good access to a range of transport modes will reduce the reliance on private vehicles, and provide associated social, environmental and economic benefits for all people and communities.

## Living with, and mitigating climate change impacts

The way we plan Greater Christchurch has a big impact on how we use and consume resources, including those that have an impact on climate change, and also how we respond to effects associated with climate change. Providing opportunities for modal shift to active forms of transport, increased uptake of public transport, reducing trip distances, and promoting new non-fuel burning transport technologies all minimise the impact the residents have in terms of their contribution to greenhouse gas emissions. How we enable carbon offsetting activities to work towards zero net carbon emissions also needs to be a consideration in our planning frameworks. Planning for development in the right places ensures that as a wider community, the adverse effects from the impacts of climate change can be appropriately avoided or mitigated, and potentially lead to long term resilience and security for food production. This includes making the right choices that take into account sea-level rise, as well as changing weather patterns and their contribution to severe weather events, including flooding and drought, so that future generations do not bear the cost of our decision-making.

Commented [MLPC8]: Submissions #7, #12, #14, #18, #3, #41, #86, #87

## Valuing the relationship between our urban areas and the environment

Greater Christchurch's settlement pattern principles from the UDS promote a sustainable urban form that protects our natural environment, rural character and versatile soils. They also align with the Ngāi Tahu value of kaitiakitanga, and recognise the mauri of waterways and cultural landscapes. Where new greenfield development will be required to help meet our future needs, there are constraints as to where development can and should occur across Greater Christchurch. Coastal and flood hazards areas, groundwater aquifers, outstanding natural landscapes, versatile soils and airport noise contours all create limitations on where new development can be located. Figure 10 outlines some of these relevant constraints (some data layers are currently being refined as part of District Plan Reviews). Other constraints exist but some can and have been mitigated ahead of development occurring, such as ground improvements in areas with geotechnical constraints or requiring raised floor levels in areas with lower flood risk. In this context, it is important to ensure that our plan for growth recognises that the vitality of our urban areas is intrinsically linked to that of our environment, and that our urban areas need to be increasingly resilient to changes in our natural environment and better integrate natural systems within the urban landscape.<sup>18</sup>

Commented [MLPC9]: Submission #1, #13

## Fostering an equitable planning approach across our communities

Although the focus of this Update is to demonstrate sufficient development capacity for growth, the wider strategic goals of the UDS will not be realised without considering the needs of more disadvantaged areas and communities. One key element of Christchurch City Council and Regenerate Christchurch's work programme is supporting regeneration in eastern Christchurch, with the post-earthquake movements of people and businesses westward heightening some pre-existing disparities. Targeted place-making investments by the public sector can give confidence to private sector housing redevelopment which typically favours more affluent neighbourhoods, driven by the more attractive returns from higher sales prices.

Underlying all these challenges will be how Greater Christchurch responds to known or potential shocks and stresses to the economy, society and our environment. For example, understanding, preparing, mitigating and adapting to climate change is a central part of the Partnership's Resilient Greater Christchurch plan. Furthermore, global financial fluctuations and the pervasive impact of new technology can fundamentally change growth projections, labour force requirements and how we function as a society. This Update is conscious of the role settlement planning can contribute to a more sustainable and resilient future but recognises that, to be effective, change needs to be a shared responsibility across all sectors and appropriately supported nationally and internationally.

<sup>18</sup> The Resilient Greater Christchurch Plan sets out how Greater Christchurch can be stronger, smarter and more resilient to the physical, social and economic challenges that are a growing part of the 21<sup>st</sup> century. It can be accessed at <http://greaterchristchurch.org.nz/projects/resilient-greater-christchurch/>





## 4.2 Priorities for this Update

This Update focuses on those key strategic planning directions that need to be undertaken collaboratively through the Partnership to address the land use and infrastructure issues identified in the Capacity Assessment. It recognises that providing development capacity is not just about land supply so also considers other more detailed planning and policy actions that will need to be implemented to realise our broader growth aspirations.

The priority areas for the Update include:

- Achieving the desired urban form and principles of the UDS, and the coordinated planning and decision-making required under the NPS-UDC, and addressing:
  - Projected shortfalls of housing development capacity in Selwyn and Waimakariri;
  - Projected shortfalls of commercial development capacity across Greater Christchurch;
- Unlocking redevelopment opportunities across Greater Christchurch, but especially in the central city, key activity centres, district town centres and along core transport corridors;
- Ensuring that future housing provides a range of dwelling types to meet the changing demand profile in Greater Christchurch, including the projected higher demand for smaller, more affordable units, and the future demand of Ngāi Tahu whānau to establish kāinga nohoanga settlements on their ancestral land;
- Integrating land use and transport planning to ensure future urban growth is effectively and efficiently supported by the transport network, including delivering a significantly enhanced public transport system;
- Ensuring public and private investments support the desired pattern of urban growth.

Our ~~proposed plan in~~ response to these priorities for Greater Christchurch is described in Section 5, Our Plan. Further actions to be undertaken by constituent partners following this Update are set out in Section 6, Our Next Steps, recognising that although the long term is addressed in this Update, additional work is required to ensure our planning directions for the longer term are appropriately investigated and implemented, and effectively respond to emerging drivers of change for Greater Christchurch.

## 5. Our Plan

Te Rautaki

### 5.1 Greater Christchurch's settlement pattern

The Partnership's ~~proposed~~ plan for supporting urban growth over the next 30 years is strongly guided by the vision and strategic goals from the UDS, and the extensive planning framework that has already been developed for Greater Christchurch to support long term growth. It focuses on responding to the priorities detailed in Section 4, Our Challenges, and seeks to provide greater certainty over the medium term (next 10 years) than the long term (10 to 30 years). This will allow the Partnership to further consider the most appropriate planning directions and responses to our longer term issues.

Our plan aims to maintain the UDS principle of consolidating urban development in and around Christchurch City, and the larger towns in Selwyn and Waimakariri. It balances the strong demand for housing in towns outside the City with the anticipated return to stronger levels of demand for higher density housing in the City. To deliver new housing of the right type and location to meet demand, both now and in the future, it is important that a suitable range of greenfield and redevelopment opportunities are provided to the market.

This takes into account the need to provide for efficient movement of people and goods, so that transport efficiency is optimised. This in turn will have an impact on Christchurch's overall contribution to greenhouse gas emissions and the efficient use of energy resources. The impact of having a compact urban form increases the ability to contribute to the uptake of public transport opportunities, as well as reduced trip distances that enable active modes of transport. Choices also need to be made to ensure that development takes place in the right places, so that we contribute to intergenerational equity and ensure that our future generations inherit as city that functions efficiently and is resilient to future impacts from climate change and resource scarcity.

In this context, the Partnership ~~proposes-identifies~~ that, by setting the housing targets shown in section 3.2, 65% of Greater Christchurch's housing growth through to 2048 should be supported in Christchurch City, with the remaining 20% in Selwyn and 15% in Waimakariri.

This settlement pattern approach features a slightly lower share of growth in the City than envisaged by the UDS, with the higher share in the districts a reflection of the strong housing demand that has characterised these areas. Our plan seeks to ensure that sufficient housing capacity is provided in both Selwyn and Waimakariri to enable growth in district towns, while also transitioning to more growth being provided through redevelopment in the City over the longer term.

To implement this plan, the Partnership ~~proposes-considers~~ that some new greenfield housing areas should be released ~~or otherwise identified~~ in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls for Selwyn and Waimakariri over the medium to long term. The location of these greenfield areas ~~would is be~~ consistent with the long term growth strategy from the UDS. Increasing take up of redevelopment opportunities will also be essential to achieve the housing targets for the City and realise the consolidated urban form aspirations for Greater Christchurch. Christchurch City Council is developing programmes to support redevelopment in the City, with the initial focus on the Central City.

Our plan for supporting business growth over the next 30 years is to focus on boosting the self-sufficiency of growing areas and respond to the needs of different commercial and industrial sectors.

While industrial space requirements are already well catered for in Greater Christchurch, new commercial space is required to support the needs of our growing population. The Partnership ~~proposes-will~~ continue to focus commercial developments predominately in the Central City, reinforcing it as the principal commercial hub of the Canterbury region, while also supporting developments in key activity centres, town centres and neighbourhood centres as part of supporting thriving local communities. Opportunities to facilitate redevelopment of brownfield land will continue to be investigated.<sup>19</sup>

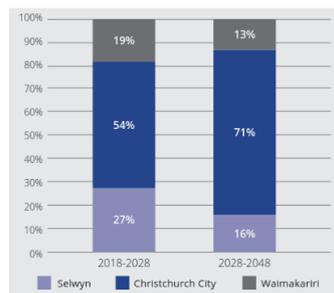
<sup>19</sup> Brownfield land refers to abandoned or underutilised business land with potential for redevelopment.

Commented [MLPC11]: Submission #7, #12, #14, #18, #37, #4, #86, #87

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

Achieving this vision **would will** require commitment from the Government to invest in the necessary improvements to our transport system, which could include investing in rapid transit services, recognising the key role of transport in shaping urban form and creating liveable urban areas.

Figure 11: Where will housing growth be located?



### How will the range of housing needs be met?

As well as providing for overall projected household growth this Update encourages a balance between new housing enabled through redevelopment opportunities within existing urban areas and development capacity, in greenfield locations in Christchurch, Selwyn and Waimakariri Districts. The approximate breakdown between these different locations for the period 2018 to 2048 is shown in Figure 12.

Figure 12: Meeting housing demand through redevelopment and in greenfield locations

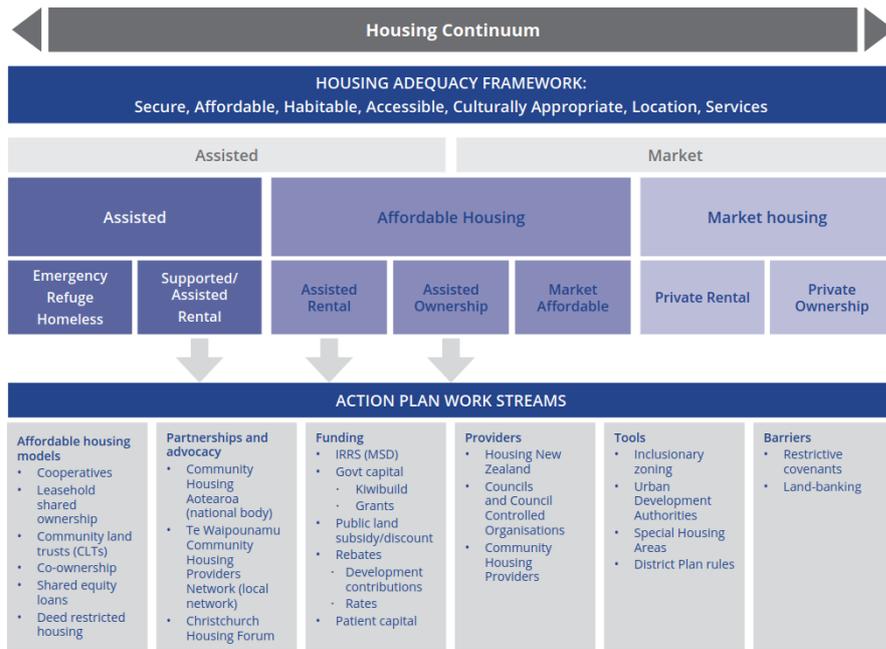


### How will we address housing affordability challenges?

Housing need relates to more than just ensuring our district plans provide sufficient development capacity. As outlined in Section 3, *Our Needs*, and Section 4, *Our Challenges*, an increasing number of households will face affordability pressures in either renting or owning their home.

Many of the potential initiatives to provide affordable housing choices across a housing continuum will need to be advanced outside of the land use focus of this Update. The Partnership is however committed to working collaboratively to develop an action plan and establish partnerships to enable social and affordable housing provision across Greater Christchurch.

Figure 13: Potential components of a social and affordable housing action plan for Greater Christchurch



What will urban growth look like in different areas of Greater Christchurch?

CHRISTCHURCH CITY	Central City	Continued investment in the central city significantly advances its regeneration and renewal, and improves its attraction as a vibrant and thriving Central City area. Its vitality as the main commercial hub for Greater Christchurch and the Canterbury region is bolstered by the completion of anchor projects and public realm improvements. Older industrial areas located in and around the central city are available to transition to meet demand for retail and office space, while commercial areas are remodelled and used more efficiently to maximise floorspace. New residential developments that enable 20,000 people to live in the central city are facilitated by a comprehensive programme of support.
	Key Activity Centres	New residential and commercial opportunities become available in and around the key activity centres in Papanui, Shirley, Linwood, New Brighton, Belfast/Northwood, Riccarton, North Halswell, Spreydon and Hornby, meeting the demands arising from the growing population. Brownfield sites are increasingly redeveloped to support new land uses linked to the surrounding neighbourhoods.
	Suburbs and Outer Urban Areas	The wellbeing and resilience of communities in the eastern suburbs are greatly improved as a result of major regeneration projects, including the restoration, enhancement and development of the Ōtākaro Avon River Corridor. New communities become established in the northern and southwestern parts of the City, especially in and around the Halswell area. Industrial developments are mainly taken up along core freight routes to Lyttelton Port, Christchurch Airport and the rest of the South Island.
SELWYN	Rolleston and Lincoln	Rolleston continues to grow as the principal centre in Selwyn, with a range of new developments supporting a vibrant town centre and the choice of housing broadening to reflect the changing demand profile of the growing town. Industrial and large format retail expand around the I-Zone Southern Business Hub, benefitting from improved connections across State Highway 1. Lincoln develops while retaining its village and university character, with opportunities emerging from new academic and business partnerships through the Lincoln Hub initiative.
	Rangiora and Kaiapoi	Rangiora remains the principal centre in Waimakariri, continuing its town centre rejuvenation and expanding mostly eastwards to support household growth. Greenfield developments are balanced with opportunities to redevelop some of the town's older housing stock. New commercial space integrates with the existing town centre, while new industrial developments are focused in the Southbrook area. Mixed use business areas identified through regeneration planning integrate with a growing town centre in Kaiapoi, with new housing supported by extending the town to the north. New housing and business developments in Ravenswood enables growth and better connections between Woodend and Pegasus.
WAIMAKARIRI	Customary Maori Lands	Kāinga nohoanga settlements on customary Māori land build stronger Ngāi Tahu networks and relationships, enabling more Ngāi Tahu whānau to live in more traditional housing arrangements, including clusters of housing with a range of housing types, linked to marae, social and community facilities and locally appropriate customary employment activities.

## 5.2 Christchurch City

By 2048, over half a million people will call Christchurch City home, and the City will provide over 85% of the employment opportunities in Greater Christchurch. The Christchurch District Plan, supported by the Christchurch City Council's Long Term Plan, provides substantial opportunities to redevelop and intensify existing urban areas to meet both housing and business needs. This includes in and around the Central City, key activity centres, larger neighbourhood centres and nodes located along core public transport corridors.

The Council is developing programmes to support investment and housing redevelopment, with the initial focus on the Central City. A Central City Action Plan ~~is being~~ developed, together with those who already live and do business in the Central City, ~~to provide~~ support over the next two to three years as anchor projects and major attractions are being completed and opened. Another priority action of the Council is the Central City Residential Programme which aims to increase the residential population of the Central City from 6,000 in 2018 to 20,000 in 2028. More people means more activity and more spending which will build confidence in Christchurch's city centre. This in turn will stimulate new investment, attract residents and deliver on the city's post-earthquake potential. The Programme is a long term commitment to achieve six overall goals:

- More people - More people choose to live within the Central City;
- Housing choice - There is housing choice that meets the diverse needs of a wide range of households;
- Liveable neighbourhoods - Central City neighbourhoods are rated highly liveable by their residents.
- Encourage delivery - The risks of development are reduced, feasibility is improved;
- Support delivery - Effective support and advice is provided to and used by Central City housing developers;
- Accelerate delivery - Delivery of Central City housing is accelerated and sustained.

Priority actions have been identified for the first three years of the Programme. These actions will put in place the processes, tools and mechanisms to increase and sustain housing delivery for the full 10 years of the Programme, and identify the early, high-potential opportunities to increase housing delivery. The geographical focus for the Programme is the Central City, however it is expected that key programme learnings and initiatives will apply to other Key Activity Centres and along transport corridors targeted for medium density development. A focus of the Council will be working with developers and local communities to support new development that is both commercially viable and of a quality to achieve high standards of liveability.

The new greenfield areas zoned in the District Plan have been carefully chosen to avoid and protect areas of value, such as the Port Hills, the protection of our drinking water sources from unconfined aquifers, efficient operation of our airport (noise contours), preservation of productive rural land and avoidance of risk from natural hazards.

A further focus of the Council will be to advance appropriate elements of the social and affordable housing action plan outlined in *Section 5.1*, through partnership with central government, housing developers and community housing providers.

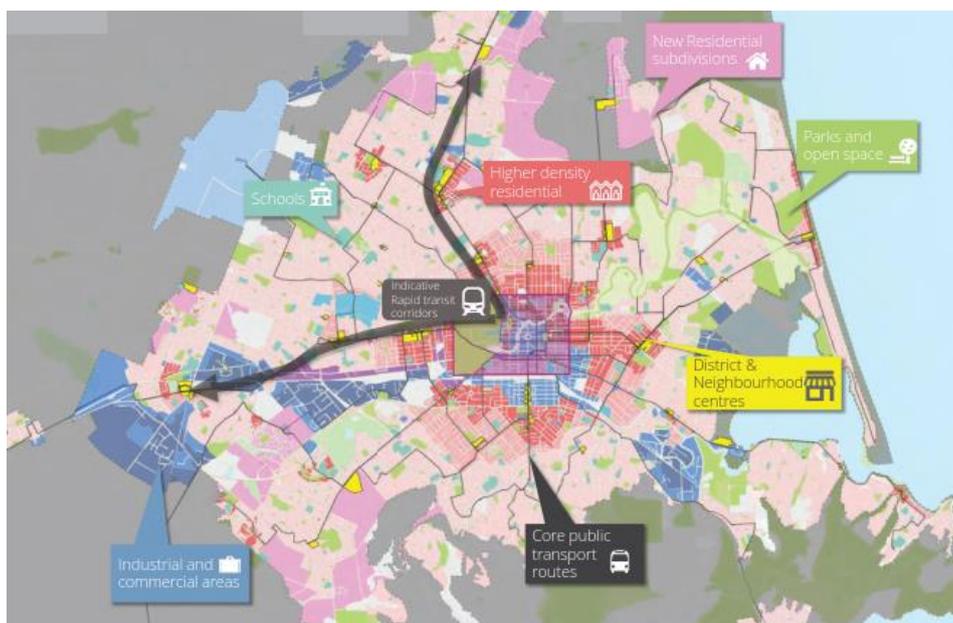
There will also be growth in employment opportunities. Over the next 30 years the central city will gain an additional 40,000 jobs, resulting in over 75,000 people working in the central city, many more than pre-quake. Employment is concentrated in a select number of areas – existing industrial and commercially zoned land and expansion of existing centres in the long term if required<sup>20</sup>. Surplus industrial land is available to transition to commercial uses, particularly if needed to support central city growth.

Half of all the jobs in Christchurch are and will likely continue to be located in the corridor between the Central City and Hornby, and nearby suburbs, including Sydenham, Addington, Riccarton, Ilam, Sockburn, and Wigram. Providing rapid transit (busways or light rail) along this corridor will make it easier for people to reach these employment opportunities and also catalyse housing development, so more people can have the opportunity to live closer to where they work. The Northern Corridor (between the Central City and Belfast via Papanui) is another opportunity where the provision of rapid transit could stimulate redevelopment. Over time other corridors such as to the airport, to Linwood and Cashmere could be considered for rapid transit to stimulate redevelopment. Outside these corridors

<sup>20</sup> The significant commercial shortfall identified by the capacity assessment for the long term, will be further sensitivity tested in the next capacity assessment.

commercial activity will continue to be located within the existing network of commercial centres particularly key activity centres<sup>21</sup>.

Figure 14: Christchurch Spatial Plan



Christchurch City is the principal centre of Greater Christchurch and contains most of the population, but the surrounding districts have also been growing quickly. Less than half of the residents of the surrounding districts work within the districts, resulting in significant commuter flows from the surrounding districts into Christchurch City. Over 100,000 vehicle trips each day travel between the districts and the City, putting pressure on the City's transport network.

As our region grows this will increase the delays on the transport network. Encouraging more of the growth to occur in Christchurch City, where the employment opportunities are, will be vital to manage the effects of growth and reduce transport network pressures. The city will work to reduce the number of vehicles that travel into the city, particularly single occupancy vehicles, but improve transport options such as active and public transport, to enable people to move around the city easily. Improvements to public transport services and infrastructure, along with associated demand management and road pricing are being considered as part of transport planning and development of business cases.

<sup>21</sup> Riccarton, Hornby, Northlands/Papanui, Linwood/Eastgate, North Halswell, Belfast/Northwood, New Brighton and Barrington/Spreydon.

### 5.3 Selwyn and Waimakariri towns

The current district plans for Selwyn and Waimakariri provide for greenfield housing areas in alignment with the settlement pattern outlined for Greater Christchurch in Map A of the Canterbury Regional Policy Statement (CRPS).<sup>22</sup> This map was inserted into the CRPS following the adoption of the Land Use Recovery Plan and covers the post-earthquake recovery period through to 2028.

The Partnership has previously considered the longer term growth needs of Greater Christchurch through to 2041, with the extent of planned greenfield areas around Christchurch City and the main towns in Selwyn and Waimakariri to support future housing growth delineated by the Projected Infrastructure Boundary on Map A.

Given the projected shortfalls in housing development capacity in Selwyn and Waimakariri to meet their future needs, a change to the CRPS is proposed to allow Chapter 6 and Map A the flexibility to respond to identified medium term capacity needs. Additional capacity will be directed in the first instance to the key towns of Rolleston, Rangiora and Kaiapoi in support of the public transport enhancement opportunities mentioned elsewhere in this Update. This is likely to identify future development areas in the two districts that are within the Projected Infrastructure Boundary. Such a change would be prepared subsequent to this Update and would likely be notified in 2019.<sup>23</sup> These new areas will provide much of the capacity required over both the medium and long term. A 2019 change to the CRPS would ensure that land can be rezoned to meet medium term capacity needs, and the longer term will be further considered as part of a comprehensive review of the CRPS scheduled for 2022. While it is intended Our Space provides direction to inform future Resource Management Act processes, Figure 16 is indicative only.

To most efficiently utilise land within identified future development areas, consideration will also be given to appropriate residential densities. An evaluation of the appropriateness of existing minimum densities specified in the CRPS for each territorial authority including a review of what has been achieved to date, constraints and issues associated with achieving these minimum densities, and whether any changes to minimum densities is likely to be desirable and achievable across future development areas will be undertaken in 2019.

**Commented [MLPC12]:** This sentence is included in relation to all submissions seeking additional land be added to Figure 16.

<sup>22</sup> Additional housing development in Rolleston has already been enabled through two Special Housing Areas.

<sup>23</sup> The Partnership is investigating whether to request using the new streamlined planning provision in the Resource Management Act 1991 to make this targeted change to the Regional Policy Statement.

The tables below show the density scenarios and anticipated yields from future development areas should density be managed differently in Selwyn and Waimakariri Districts.

Table 5: Selwyn: Long term shortfall : 5,475

Theoretical additional capacity enabled in existing urban areas*	Density scenarios and anticipated yields from FDAs <sup>^</sup>		
	Density 10 hh/ha	Density 12 hh/ha	Density 15 hh/ha
0	4,700	5,650	7,050
500	5,200	6,150	7,550
1,000	5,700	6,650	8,050
1,500	6,200	7,150	8,550
2,000	6,700	7,650	9,050

Table 6: Waimakariri: Long term shortfall : 7,675

Theoretical additional capacity enabled in existing urban areas*	Density scenarios and anticipated yields from FDAs <sup>^</sup>		
	Density 10 hh/ha	Density 12 hh/ha	Density 15 hh/ha
0	4,500	5,400	6,750
500	5,000	5,900	7,250
1,000	5,500	6,400	7,750
1,500	6,000	6,900	8,250
2,000	6,500	7,400	8,750
2,500	7,000	7,900	9,250

\* Subject to enabling this additional capacity via the District Plan Review and using other mechanisms outside of the District Plan to encourage infill/intensification development. Whilst more theoretical capacity may be enabled through District Plan Reviews, robustly calculating feasibility is also limited by a lack of comparable development that provides data (e.g. house sales) within zoned areas.

<sup>^</sup> This is derived from a total 'gross' hectare and does not take into account infrastructure requirements and structure planning that may reduce the developable area and total dwelling count.

In the meantime, it is expected that new urban housing in Waimakariri and Selwyn will achieve a minimum net density of 12 households per hectare<sup>24</sup> where any Future Development Area is subsequently zoned. For this purpose, net density has the same meaning as set out in the Canterbury Regional Policy Statement. This will also provide strong guidance for the development of District Plans for both Waimakariri and Selwyn districts.

Commented [MLPC13]: Submissions #10, #74

The housing demand figures in Table 1 captures some additional growth from rural areas. This is from area units that are either part rural or all rurally zoned being included in the demand figures. However, most of this rural future demand will continue to be met by rural developments in rural zones with some moving to urban areas.

Selwyn District and Waimakariri District are undertaking reviews of their respective District Plans. Both reviews will also assess additional provisions to encourage and enable redevelopment within existing urban areas and close to town centres. This is in response to the projected changes in housing demand over the next thirty years, and the role that redevelopment plays to deliver smaller, more affordable housing types that will increasingly be needed to meet future demand. Until these reviews are complete, an understanding of whether any remaining development capacity shortfalls remain is uncertain and can be better understood as part of future capacity assessments in 2020 and every three years thereafter.<sup>25</sup>

<sup>24</sup> This expectation is that a minimum density of at least 12 households per hectare will be achieved.

<sup>25</sup> Some potential yields from different development scenarios were investigated as part of the options assessment outlined in Section 5.7.

For Selwyn, this Update supports the purpose and direction of Selwyn 2031 by promoting a sustainable, consolidated centres-based urban growth pattern that supports the changing population and their housing needs. This, in turn, allows for greater public transport usage. The District Plan Review is supporting this by not actively seeking to rezone additional land for living or business outside of the Projected Infrastructure Boundary. This Update will help provide a further evidence base for updates to Selwyn 2031 and other strategic documents to accommodate long-term growth through high quality urban environments. Any potential additional provision of business and housing land within the Greater Christchurch area in Selwyn will be strongly guided by this evidence and the current structure plans and town centre studies, ongoing market indicator monitoring and the evolution of the policy framework through the district plan review process.

For Waimakariri, the Council is at the early stages of planning to develop Structure Plans for east and west Rangiora and east Kaiapoi to identify how best to respond to the residential shortfall in capacity for the medium to long term. This is along with considering the long term capacity requirements of Ravenswood/Pegasus and Woodend, outlined in Waimakariri 2048: District Development Strategy.

The Council is also focusing on adopting the Kaiapoi Town Centre Plan and updating the Rangiora Town Centre Strategy to continue to improve the self-sufficiency of these townships. Once these planning documents have been completed, additional zoning requirements to meet capacity shortfalls in both residential and commercial will be considered as part of the District Plan Review. This will be supported by monitoring ongoing market indicators and detailed commercial assessments.

Figure 15: Proposed Future Development Areas in Rolleston, Kaiapoi and Rangiora

Commented [MLPC14]: Rolleston map updated in response to #26

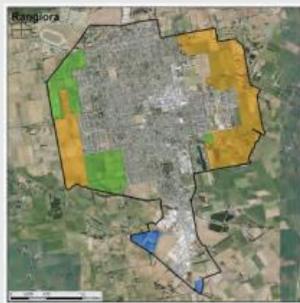
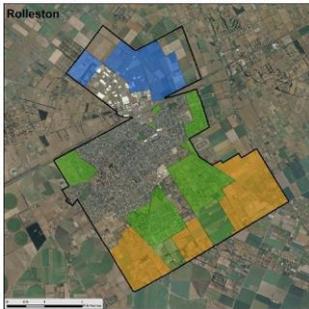
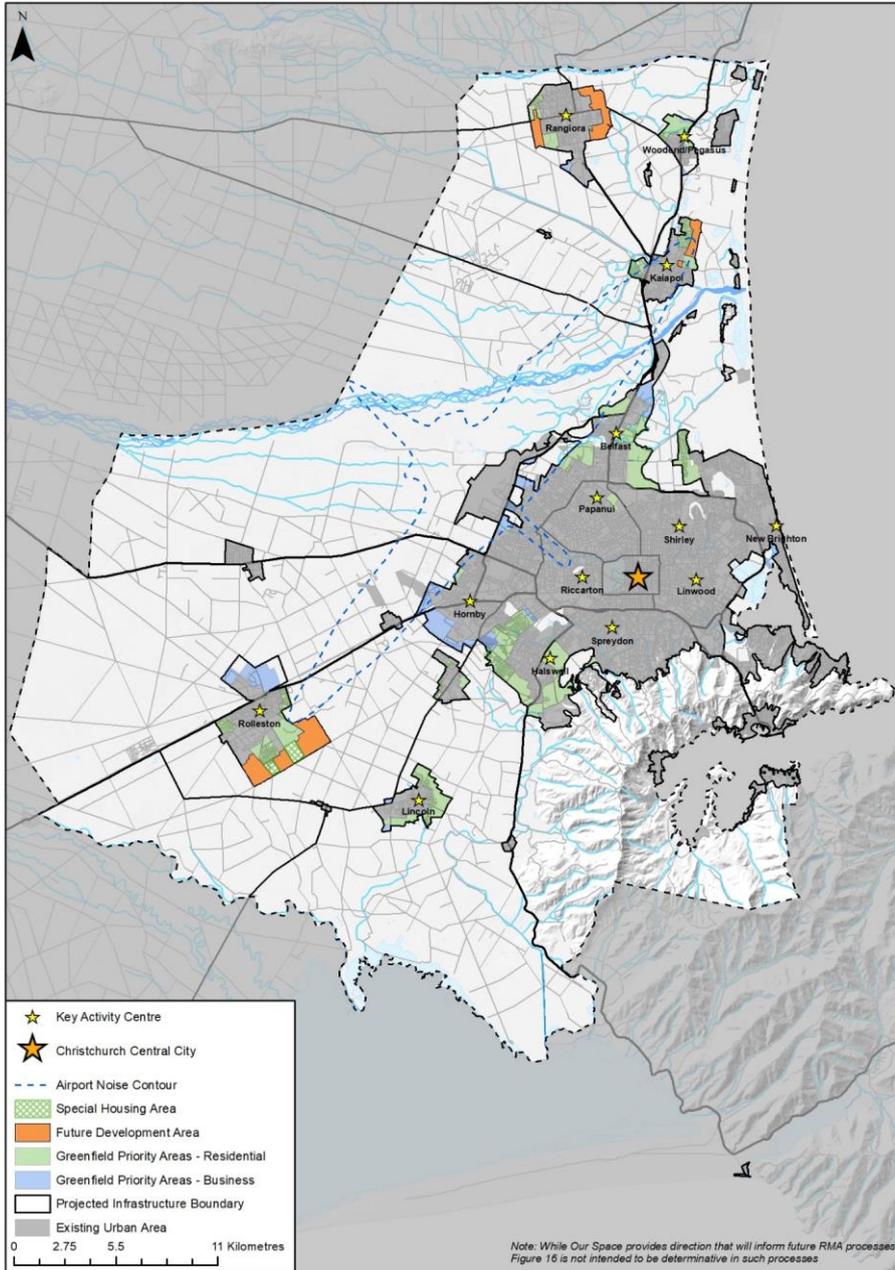
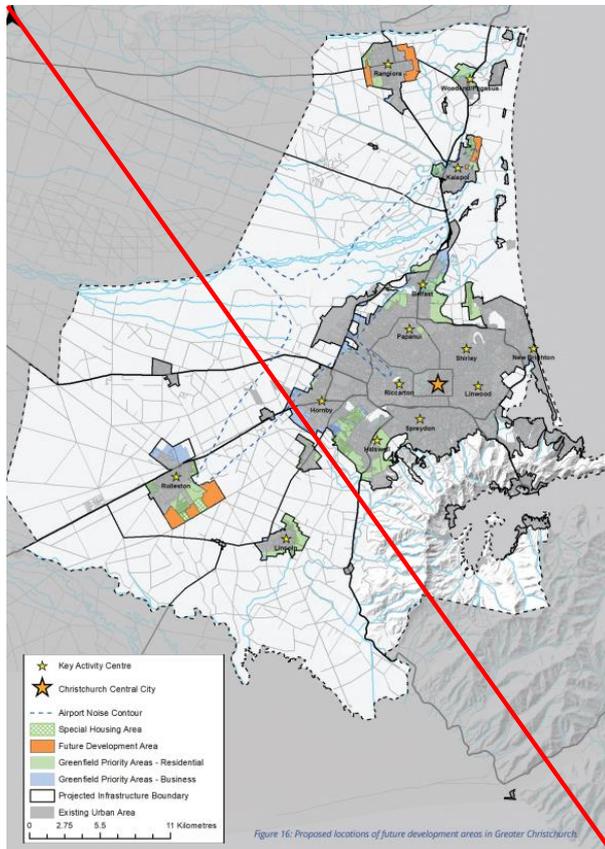


Figure 16: Proposed locations of future development areas in Greater Christchurch. While it is intended Our Space provides some direction to inform future RMA processes, Figure 16 is indicative only.

Commented [MLPC15]: Updated in response to #26





## 5.4 Land for cultural purposes

Important for mana whenua is the future ability to establish kāinga nohoanga settlements on their ancestral land. The concept of kāinga nohoanga embodies the following types of residential activities:

- Provision for whānau where extended families can live in close proximity to one another and build strong networks and relationships;
- Allowance for the construction of a mixture of housing types and densities;
- Provision for dwellings to be located in close proximity to traditional structures, such as marae, and the enablement of customary activities.

Kāinga nohoanga is not only about creating housing opportunities on tribal land. It is also about providing the commercial, social and community facilities and opportunities that allow Ngāi Tahu whānui to fully occupy and use ancestral land, recognising and enabling the principles for which the land was originally set aside.

Historically, there have been many barriers to the development of Māori customary land, including rural zoning (thereby preventing more intensive residential developments) and the lack of provision of services.

Substantial changes were made to the Waimakariri District Plan following the statutory directions included in the Land Use Recovery Plan. Further work between mana whenua and local authorities is creating a more permissive environment for the creation of kāinga nohoanga, although much work remains to be done.

Additional challenges facing the development by mana whenua of their ancestral land are the issues of climate change and sea level rise. It is likely over coming years that some Māori customary land will be more difficult to service with some areas becoming inundated, rendering them unusable for customary purposes. In these circumstances, it will be necessary for new land to be acquired and classified as Māori land under the Te Ture Whenua Māori Act 1993.

Recently, significant progress has been made in both the Canterbury Regional Policy Statement, the Christchurch District Plan and the review of the Selwyn District Plan towards creating a planning framework that is better equipped to enable kāinga nohoanga to be developed on Māori customary land, provided any adverse effects are appropriately avoided, remedied or mitigated (particularly those effects that have the potential to emanate beyond the boundary of the kāinga nohoanga development/zone).

At present, there are only two parcels of land within the existing greater Christchurch urban area that are classified as Māori customary land (in accordance with the Te Ture Whenua Māori Act 1993); namely, MR873 at Tuahiwi and MR875 at Rāpaki. In the future, however, it is possible that new areas within the Greater Christchurch urban area may be classified as Māori customary land, provided such land has been appropriately designated as such under the Te Ture Whenua Māori Act 1993.

While it is not anticipated that future kāinga nohoanga developments would be a major contributor to the overall housing capacity within greater Christchurch, they are nonetheless viewed by Ngāi Tahu whānui as playing an important future role in enabling mana whenua to live, work and play on their ancestral land in a manner that is consistent with the purposes for which such land was originally set aside pursuant to Kemp's Deed of 1848.

It is anticipated that an integrated and collaborative approach between district councils and Ngāi Tahu whānui would be taken to any necessary upgrades of infrastructure that are deemed necessary to service future kāinga nohoanga developments, including reticulated sewerage, wastewater disposal and the supply of drinking water.

## 5.5 Sequencing and staging of growth

At a local level the Capacity Assessment outlined which areas signalled for growth are already supported by trunk infrastructure.<sup>26</sup> This primarily relates to wastewater networks. Infrastructure strategies associated with the recent completed 2018-2028 Long Term Plans have documented the planned infrastructure works scheduled to be completed over the medium and long term to unlock remaining growth areas. These integrate and align with structure plans for main towns covering the development phasing associated with the efficient roll-out of infrastructure.

At a Greater Christchurch level sequencing is important to align with cross-boundary investments, especially those relating to the transport network. Collaborative planning undertaken when developing infrastructure strategies and regional land transport plans will be the mechanism to address and resolve any potential misalignment.

Future growth areas identified in Figure 15 and 16 will require more detailed planning, technical assessments and consultation with landowners to determine more specific staging of development. Existing policies in Chapter 6 of the CRPS already provide clear direction which these detailed planning processes must give effect to, particularly Policies 6.3.2 to 6.3.7. They ensure the staging of development considers how to support good urban design, align with infrastructure needs and integrate with existing urban areas. Associated policy wording is proposed to complement a change to the CRPS Map A. This will enable District Plan reviews for Selwyn and Waimakariri Districts to over the medium term, zone and otherwise enable development capacity in accordance with meeting the medium term housing targets incorporated in the CRPS. Reviews of targets and the sufficiency of development capacity are part of periodic capacity assessments and enable the CRPS and district plans to remain responsive to demonstrated need. consider areas for future growth necessary for the intended life of such plans but include principles or triggers to establish a robust case for rezoning additional land.

**Commented [MLPC16]:** Submission #5 and Theme 5 recommendation 2, 3 and 4

<sup>26</sup> Outlined in Section 4.2 and 8.3 of the Capacity Assessment and further detailed in supporting technical reports.

All greenfield growth areas within Christchurch City are already zoned. Redevelopment is largely not constrained by infrastructure so the location and timing of development will be principally governed by the market. The role of the City Council and other influencers is therefore to encourage and support the market to respond to opportunities most likely to support Central City and suburban centre growth and increase the scale and range of housing available close to key public transport routes.

DRAFT

## 5.6 Transport and other infrastructure

### Integrated land use and transport planning

Over the next 30 years, Greater Christchurch is projected to see significant population growth, meaning more people will be making more trips across the transport network. If traffic volumes increase at the same rate as the population, there will be more congestion and longer journey times. Further major investment in the road network is not scheduled. For Greater Christchurch to remain productive, the integration of land use and transport planning is therefore essential to managing our future urban growth.

Transport infrastructure, services and mode choices are important for enabling and supporting population and housing growth in new and existing urban areas, while the location of growth affects how well the transport system performs. Given transport and land use are so strongly connected, all decisions need to consider their impact on the other.

In this context, the Government Policy Statement on Land Transport (GPS) has provided new opportunities for how we can plan for growth as it represents a fundamental shift in the strategic direction for transport in New Zealand. It seeks to transition to a more holistic, mode-neutral approach to transport investment, with an increased focus on achieving a range of social and environmental outcomes. It also places more emphasis on the crucial role of transport in shaping urban form, creating liveable cities and reducing the need to travel by private vehicle.

It will be important to ensure that transport is integrated with land use but also that all the components of the network are joined in a way that makes it easier to make choices on how to travel. Greater Christchurch already has a well-integrated network that has very high accessibility. This means that for a majority of areas there is a choice of options for walking, cycling, public transport or using a private car, with strong integration between these different modes of travel.

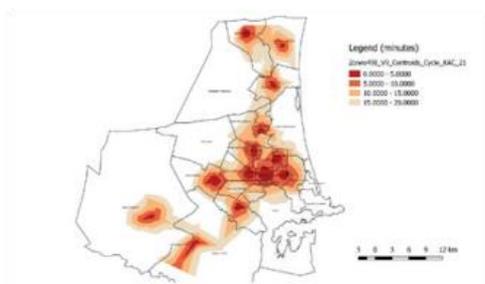
Recent investments in the cycleway network have provided more opportunities to encourage safer cycling trips around Christchurch City and between centres, while technological advances through electric bikes will mean that this mode will become increasingly accessible as a means of travel.

However, with significant population growth within the City and in the surrounding districts, the current freedom and independence we enjoy in travelling around will in future become more difficult unless there is a significant shift in how we think about and approach transport.

Transport business cases underway will consider the multi-modal transport programme that will address such matters. These include specific investigations to determine the appropriate investment required to support an enhanced public transport system and improvements along key transport corridors, including those that are part of the strategic transport network and support freight movements. The development of a business case for how the vision for an enhanced public transport system could be achieved is a key element of a wider multi-modal transport programme being considered for Greater Christchurch. This programme would will be developed on the basis of the strategic directions from the UDS, and would contribute to the strategic goals related to an integrated and managed urban development.

Commented [MLPC17]: Submission #39, #67

Figure 17: Cycling accessibility from activity centres



In particular, it ~~would~~ will help create a more efficient, reliable, safe and resilient transport system that promotes the use of active and public transport, and improves accessibility for all people in Greater Christchurch. Integrating land use and transport is particularly important for rapid transit and supporting an efficient public transport network. Each can have a positive influence on the others by improving the accessibility of an area and supporting growth and housing density around rapid transit corridors and stations. This is essential to maximise the benefits from the large investment required to build and operate rapid transit.

### Future of public transport

The strategic priorities underpinning the GPS align with the work being undertaken by the Greater Christchurch Public Transport Joint Committee to deliver a step change in Greater Christchurch's public transport, as described in the Canterbury Regional Public Transport Plan (RPTP).<sup>27</sup> The RPTP contains an ambitious vision to fully integrate the public transport system with the wider transport system and urban form, thereby increasing mobility and accessibility across Greater Christchurch.

### Vision for Greater Christchurch's public transport system

Public transport is innovative and successful and sits at the heart of a transport network that supports a thriving, liveable Greater Christchurch. The public transport system is accessible and convenient, with high quality, zero emission vehicles and facilities. The system gets people where they want to go – as a result it is well used and valued by the people of Greater Christchurch.

As part of achieving this vision by 2048, the RPTP envisions two rapid transit corridors that will offer high speed public transport services to the north and south-west of Christchurch City, significantly enhancing links with the growing towns of Rolleston, Rangiora and Kaiapoi. By investing in rapid transit services (such as light rail, rapid bus ways or automated trackless trains) and encouraging higher density development along high demand corridors, more people will be able to access jobs, services, recreation and education without necessarily having to rely on a private vehicle. Ensuring public transport is increasingly usable for all people has major social, environmental and economic benefits.

The improvements outlined in the RPTP include service enhancements across the network, infrastructure improvements on key routes, on-demand services (such as demand responsive transport, bike sharing, ride sharing and car sharing) and being well equipped to adopt new opportunities arising in information technology, intelligent transport systems, zero-emission vehicles and autonomous vehicles.

Realising this vision for our public transport system will require an increase in investment. The Government has signalled through the GPS that the overall level of capital investment available for public transport will be greater, reflecting the strategic focus of shifting trips in New Zealand's cities from private vehicles to more efficient, low cost modes of transport.

Further conversations with the Government will explore how additional funding could help us to achieve our vision for public transport more quickly, supporting our aspirations for a consolidated urban form and multi-modal journeys.

### Freight transport

Greater Christchurch is also a major freight hub for Canterbury and the South Island, with two inland ports, the Port of Lyttelton and Christchurch International Airport, acting as major gateways for produce and people. The strategic road and rail networks in Greater Christchurch also play a significant role in the distribution of freight within the sub-region, as well as to neighbouring regions and the rest of New Zealand.

An important part of managing the transport network is to ensure that freight can be moved efficiently to and through Greater Christchurch and this will require effective management of congestion on the main freight routes. It is crucial that the strategic infrastructure and networks across Greater Christchurch are able to meet future demand and are protected from any adverse effects of growth. This is a key aspect of the Regional Land Transport Plan (RLTP) and transport business cases to support future transport investments.

### Future programme and investment

While the Partnership is working towards improving transport choice, more work is needed to get people thinking about how they travel differently, whether it be by public transport, walking, cycling or as a passenger in a private car.

Such a transport programme would include:

- Improved public transport network and services including mass transit corridors;
- Development of walking and cycling networks;
- Travel demand management initiatives;
- Completion of funded strategic road network improvements, including the Northern Corridor and Southern Motorway;
- Embracing new technology changes

How to improve integrated land use and transport planning was a key deliberation when deciding how future urban development should be accommodated in Greater Christchurch. Part of the rationale for the proposed locations for growth was therefore to ensure future growth is appropriately aligned with long term transport planning and investment, meaning more people will be living in areas that are accessible to a mix of transport modes.

The existing and future Christchurch transport network is shown in Figure 18. Investment in this future will be considerable (approximately \$1.56b capital and additional annual operating costs) over the next 30 years and needs to be well aligned to a supportive land use. It will require collaboration and investment by the Greater Christchurch Partnership and Central Government as well as the community to achieve this outcome.

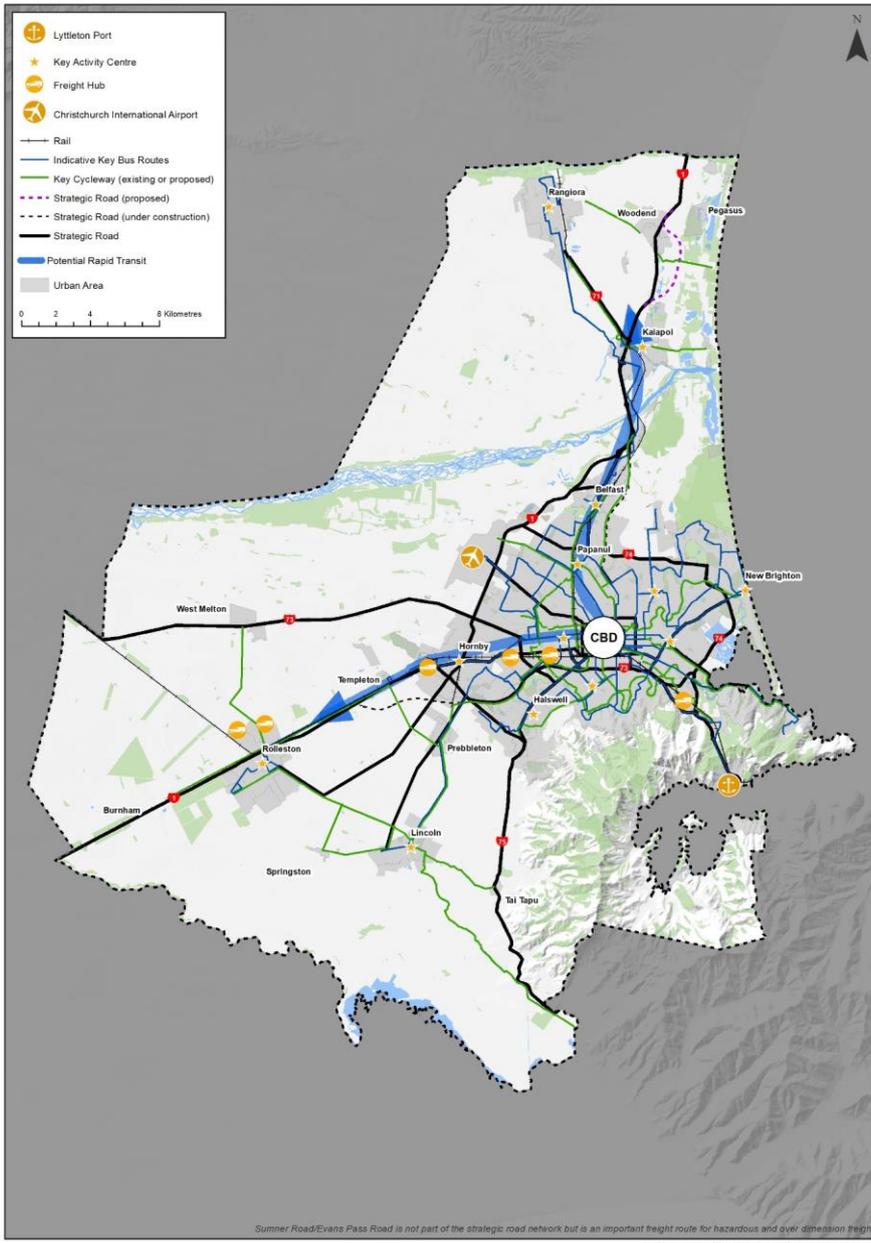
Reduced reliance on private vehicles as a result of increased land use and transport integration will have associated congestion, safety, access, environmental and cost benefits for people and communities across Greater Christchurch.

Commented [MLPC18]: Submission #39, #67

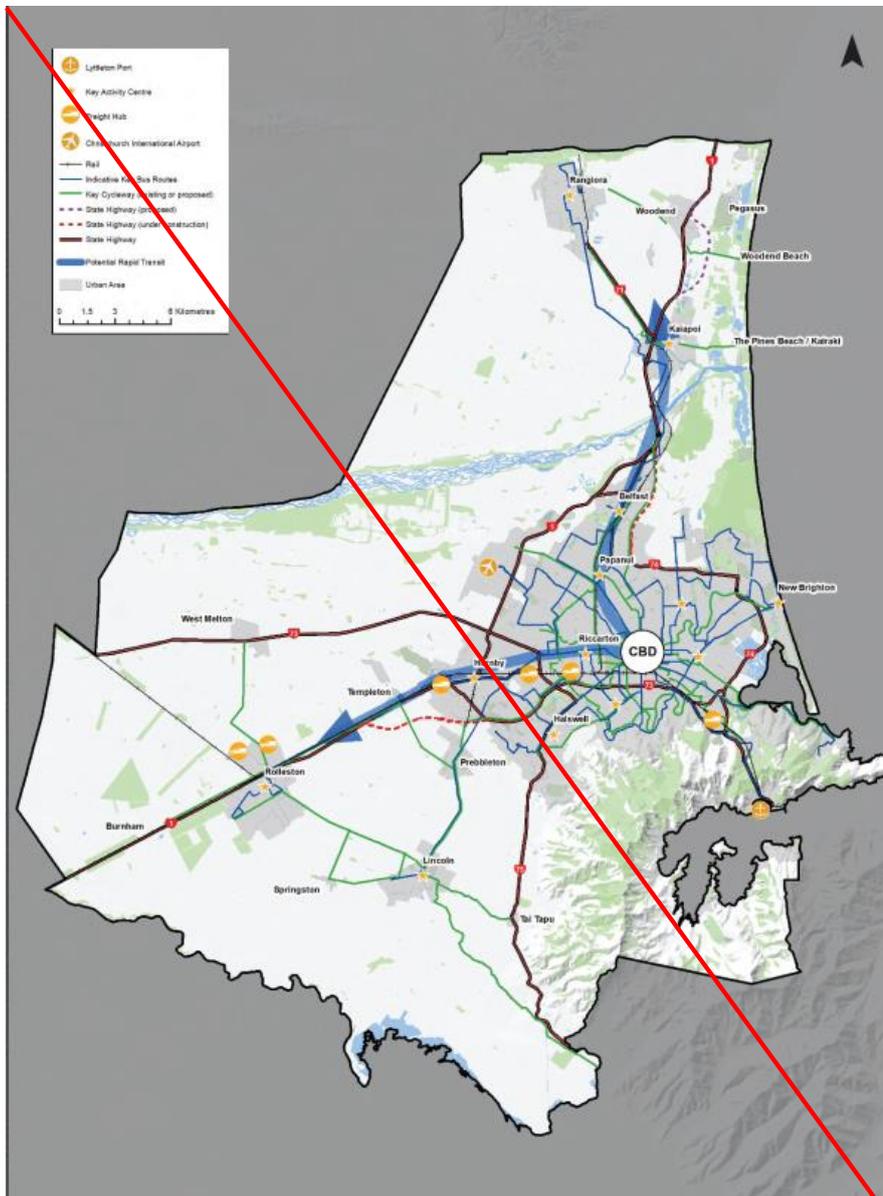
Commented [MLPC19]: Moved from next page

Figure 18: Greater Christchurch transport network – existing, planned or proposed routes and modes<sup>28</sup>

Commented [MLPC20]: Updated in response to submission #39, #67



<sup>28</sup> Routes for proposed rapid transit, other public transport services and cycling are all indicative unless already adopted in relevant Council plans.



Future of public transport

The strategic priorities underpinning the GPS align with the work being undertaken by the Greater Christchurch Public Transport Joint Committee to deliver a step change in Greater Christchurch's public transport, as described in the draft Canterbury Regional Public Transport Plan (RPTP).<sup>29</sup> The draft RPTP proposes contains an ambitious vision to fully integrate the public transport system with the wider transport system and urban form, thereby increasing mobility and accessibility across Greater Christchurch.

#### Vision for Greater Christchurch's public transport system

Public transport is innovative and successful and sits at the heart of a transport network that supports a thriving, liveable Greater Christchurch. The public transport system is accessible and convenient, with high quality, zero emission vehicles and facilities. The system gets people where they want to go — as a result it is well used and valued by the people of Greater Christchurch.

As part of achieving this vision by 2048, the draft RPTP envisions two rapid transit corridors that will offer high speed public transport services to the north and south west of Christchurch City, significantly enhancing links with the growing towns of Rolleston, Rangiora and Kaiapoi. By investing in rapid transit services (such as light rail, rapid bus ways or automated trackless trains) and encouraging higher density development along high demand corridors, more people will be able to access jobs, services, recreation and education without necessarily having to rely on a private vehicle. Ensuring public transport is increasingly usable for all people has major social, environmental and economic benefits.

The improvements proposed outlined in the draft RPTP include service enhancements across the network, infrastructure improvements on key routes, on demand services (such as demand responsive transport, bike sharing, ride sharing and car sharing) and being well equipped to adopt new opportunities arising in information technology, intelligent transport systems, zero emission vehicles and autonomous vehicles.

Realising this vision for our public transport system will require an increase in investment. The Government has signalled through the GPS that the overall level of capital investment available for public transport will be greater, reflecting the strategic focus of shifting trips in New Zealand's cities from private vehicles to more efficient, low cost modes of transport.

Further conversations with the Government will explore how additional funding could help us to achieve our vision for public transport more quickly, supporting our aspirations for a consolidated urban form and multi-modal journeys.

#### Other development infrastructure

Infrastructure networks required to enable new development principally relates to transport and the three waters: water supply, wastewater and stormwater. Based on extensive strategic planning undertaken through the Partnership over the last decade to identify future locations for housing and business growth, the constituent partner councils have been able to plan for and invest in the infrastructure needed to support development in these areas. This means most areas proposed in this Update for future development are already sufficiently serviced to be considered 'shovel ready'.

Most of the areas not currently serviced with sufficient infrastructure network capacity will be following the completion of planned upgrades.<sup>30</sup> This includes in parts of the northern, south-western and eastern areas of Christchurch City. These capacity constraints are addressed in Christchurch City Council's Long Term Plan and will be resolved by 2028.

Councils' infrastructure strategies outline how sufficient infrastructure network capacity will be provided for to ensure future growth is effectively and efficiently accommodated. Although Christchurch City Council's Infrastructure Strategy is based on a lower projected growth for the next 30 years than is considered in this Update, the Council has processes, plans and initiatives that can appropriately manage infrastructure capacity requirements to ensure that the housing growth targets proposed in this Update are met. More detailed infrastructure modelling of areas proposed for commercial redevelopment will follow once specific locations are identified.

<sup>29</sup> The draft Canterbury Regional Public Transport Plan was released for public consultation in September 2018.

<sup>30</sup> Some industrial zoned land in Christchurch City is not proposed to be serviced.

In the same way, the Selwyn Infrastructure Strategy also uses a lower projected growth for the next 30 years than is considered in this Update. However, all zoned land as well as land within the Proposed Infrastructure Boundary and Special Housing Areas have been factored into the strategy. Further, any additional up-zoning or greenfield capacity to cater for projected growth, will need to be factored into the infrastructure works programme once the next phase of strategic planning has been undertaken.

Discussions with other infrastructure providers indicate that the availability of such infrastructure as electricity and telecommunications is either available or will be available to service all housing and business growth needs in Greater Christchurch over the next 30 years. The provision of social and community facilities, including schools, healthcare and community halls, have also been well planned for as part of the post-earthquake recovery planning for Greater Christchurch, and are therefore not considered to represent a constraint on future development. [Existing planning provisions in the CRPS and district plans ensure growth does not compromise the efficient operation of strategic infrastructure.](#)

It will be important that constituent partner councils continue to engage with infrastructure providers to ensure growth is effectively and efficiently supported over the next 30 years by delivery of necessary infrastructure.

DRAFT

## 5.7 Why is this our proposed approach?

### Aligning with the strategic growth directions from the UDS

This Update furthers the achievement of economic, social, environmental and cultural wellbeing outcomes outlined in the UDS and summarised in Section 2.3. It sets out a settlement pattern and a consolidation approach to urban development that is more sustainable than might result from a more *laissez faire* scenario. It responds to anticipated changes in demand while supporting wider programmes of action to address challenges, such as climate change, that require solutions beyond just urban planning.

The locations for growth outlined in Section 5, *Our Plan* and the housing targets (detailed in Section 3.2) reflect a balanced approach to achieving the consolidated growth directions of the UDS while responding to current and projected market demands. The ~~proposed~~ settlement pattern supports a key aim of the UDS to create a vibrant and thriving Central City.

It fosters an increasing Central City population and enables the Central City and surrounding business land to transition over time to provide for increased office and retail floorspace, maximising the existing public and private investments made throughout a period of recovery.

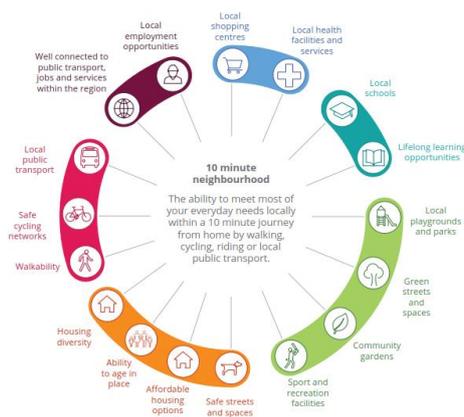
This approach meets the requirements of the NPS-UDC, being informed by the Capacity Assessment and having had particular regard to NPS-UDC Policy PA1, but has also been guided by the UDS, CRPS, District Plans and the Long Term Plan and Infrastructure Strategies required under the LGA. The Partnership is conscious of the need to balance the certainty regarding the provision of future urban development with the need to be responsive to demand for such development. Ongoing requirements in the NPS-UDS for evidence and monitoring to support planning decisions will enable periodic review and consider any required amendments to this approach.

Consolidated growth enables towns and centres to more easily provide the local facilities and services that communities need and maximises the efficiency of key transport routes and other infrastructure services. Supporting the growth and vitality of key activity centres is engrained in the UDS and the CRPS Chapter 6 gives strong policy direction to territorial authority plans. Figure 19 encapsulates this concept and outlines the types of services, amenities and factors that councils and other agencies can provide for in these areas.

Commented [MLPC21]: Submissions #7, #75, #84

The ~~proposed~~ settlement pattern enables around two-thirds of new households to be accommodated within the Christchurch City area and allows for the larger towns in Selwyn and Waimakariri Districts to continue to grow.

Figure 19: Concept of a 10-minute neighbourhood for key centres



This provides a good level of housing choice across Greater Christchurch and recognises that within a single housing market there are many and varied reasons for where and how people choose to live.

Taken together, new subdivisions in greenfield locations across all three council areas will account for around 55% of the identified housing capacity. 'Intensification', being development in existing urban areas through infill and redevelopment, is expected to provide for the remaining 45%, primarily in Christchurch City but not exclusively. This broadly corresponds with intensification targets already outlined in the CRPS and Christchurch District Plan.

As outlined in Section 3, Our Growth Needs, much of this housing capacity is already provided for in District Plans. The ~~proposals-responses outlined~~ in this document centre on the remaining housing shortfalls shown in Table 3 (around 1546,500 dwellings) for Selwyn and Waimakariri Districts to meet housing targets being considered in context with wider strategic planning.

Directing future housing growth to development capacity already signalled by the Projected Infrastructure Boundary in Map A ~~of the CRPS~~ represents the most efficient and effective option for accommodating these shortfalls. For some time now the Councils have factored these areas into respective 30 year infrastructure strategies associated with Long Term Plans. These plans have already benefited from extensive community input, as did the earlier UDS engagement and subsequent resource management and recovery consultation processes that led to Chapter 6 of the Canterbury Regional Policy Statement.

Further more detailed assessment of these future growth areas will be required, and undertaken as part of district plan reviews, and can address any new requirements relating to managing risks of natural hazards and mitigating impacts on versatile soils.

### Reflecting changing housing needs

As outlined in Sections 2, 3 and 4 demographic change will mean an increasing percentage of our population will be over 65 and average household size will continue to decline. The cost of housing, both home ownership and renting, will continue to represent a significant component of household expenditure.

New households will have different housing preferences and affordability constraints, but to better align the total housing stock across Greater Christchurch with the overall household composition, new development would need to favour smaller and more affordable housing types.

~~Smaller and multi-unit dwellings that take advantage of more efficient building construction techniques and adopt new home ownership and rental models can aid the provision of more affordable homes. Housing should meet the needs of our population at all stages of life. Locating new development closer to the provision of local facilities and community services can also improve access to the health needs of a ~~n-aging population-population that is both aging and has increasing long term conditions and disabilities~~, and reduce the transport costs associated with overall household expenditure.~~

Increasingly more households are also beginning to take advantage of new technology and on demand services to enable a more inner-city lifestyle, closer to the social and cultural amenities offered in and around the centre of Christchurch. The implementation of the 8011 Central City Housing Programme will determine the scale of demand in this market segment and the role public agencies and private sector developers can play to provide for this housing type.

These trends have therefore informed the transitional approach adopted when setting housing targets in Table 2.

### Supporting future public transport investment

The future investment in our public transport system highlighted in Section 5.6 will influence and be influenced by how our City and surrounding towns accommodate future growth. For such investment to be sustainable it needs to foster significant increases in public transport patronage.

A settlement pattern approach that encourages greater urban densities, particularly along key public transport corridors provides the greatest opportunity for people to live in close proximity to proposed new rapid transit routes, increasing the likelihood and attractiveness for people to adopt these transport modes.

Commented [MLPC22]: Submission #15

Commented [MLPC23]: Submission #58

## What about other options?

In arriving at ~~this the proposed~~ settlement pattern, three alternative options were investigated.

One option investigated providing for growth based directly on the population and household projections derived from Statistics NZ data (Option A). Another option considered a scenario whereby a greater proportion of additional household growth was directed to the Christchurch City area over the next 10 years, anticipating a more rapid return to the levels of redevelopment in the City experienced prior to the earthquakes (Option B).

Compared to ~~the option proposed in~~ this Update (Option C), Option A would require increased capacity to be provided in Selwyn and Waimakariri Districts for the period 2028-2048, totalling nearly 10,000 additional dwellings.

Compared to our ~~proposed~~ plan (Option C), Option B would reduce the housing provision necessary to be identified in Selwyn and Waimakariri Districts over the next 10 years by around 5,500 dwellings (resulting in a total of 15,000 dwellings less than Option A over the 30 year period), relying on the range of housing options available in Christchurch City to meet housing demand not able to be accommodated in the main towns of the Districts.

Aside from further mitigating many of the local effects identified for Option A, assessment of Option B focused on the significant departure from current market housing conditions.

Option B would require average annual building consents for additional dwellings to be 1750/yr for Christchurch City with an increasing proportion met through redevelopment. While consents for new housing in Selwyn and Waimakariri Districts appear to have softened over the last year (partly due to a general decrease in the level of building consents across Greater Christchurch during 2018), in Selwyn they are still tracking closer to the high growth rate.

Further explanation and assessment of these options, and the reasons why Option C was considered the ~~preferred~~ selected option, is covered in a ~~supporting separate~~ options assessment document.

## 6. Our Next Steps

### 6.1 Responsive planning

With many of the primary drivers and influencers of urban development in Greater Christchurch being in a state of change, a responsive approach to planning is necessary to ensure that future opportunities to shape our urban areas and achieve our desired outcomes are realised. This will require monitoring and evaluation, continued relationship building and commitment to this partnership. Key drivers of change at the local, national and global level include:

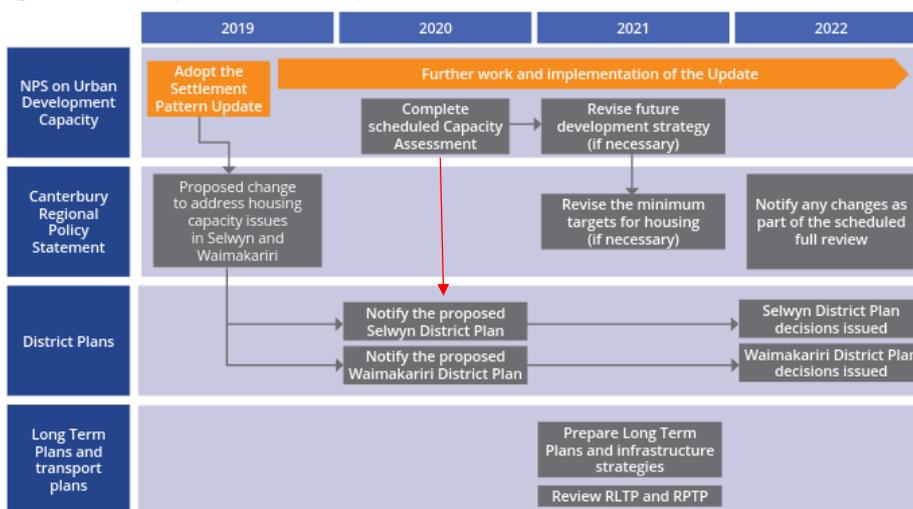
Commented [MLPC24]: Submission 58

- Shifting post-earthquake trends in the residential, commercial and industrial markets, as well as the development sector, as the rebuild and recovery of Greater Christchurch continues to mature;
- Emerging Government policy in relation to urban growth and development, transport, regional economic growth, and local government funding and financing, which will provide new opportunities for our approach to planning;
- Changing population and household profiles, and composition of the local economy, which will influence the type of housing and employment that is required in the future to meet the needs and preferences of residents;
- Evolving technologies (such as mass automation, digital workspaces) and their increasing adoption, which will influence how our urban areas function, especially in terms of how people work and travel (such as autonomous vehicles);
- Delivering large-scale regeneration projects that will significantly affect surrounding local areas and communities, and Greater Christchurch overall, including for the Ōtākaro Avon River Corridor, Kaiapoi area and Central City;
- Growing need to manage and adapt to the natural hazard risk facing our coastal communities given the anticipated sea level rise, and related coastal inundation and groundwater level effects, over the next 30 years and beyond.

Given these drivers of change, this Update has been prepared to provide greater certainty over the medium term in regard to how development capacity issues will be addressed (Section 4, *Our Challenges*) and more flexibility over the long term to enable the Partnership to further consider the most appropriate planning directions and responses.

Following the adoption of the response to this Update, the Regional Council and District Councils will insert the relevant housing targets directly into their respective plans, in accordance with NPS-UDC Policies PC5 to PC11.

Figure 20: Scheduled implementation and review process 2019-2022



## 6.2 Further work and implementation

The Partnership is committed to undertaking further work to assess, consider and address some of the priority growth issues for Greater Christchurch. These actions include workstreams already planned by constituent partners and those that are now proposed to respond to the priorities identified in this Update. The aim of this future work is to ensure our long term planning directions for Greater Christchurch are appropriately investigated and implemented.

The key actions from this Update have been grouped under three broad themes:

- Strengthen our partnership approach;
- Improve our tools and evidence base;
- Build on our planned direction for growth.

Many of the actions that will be undertaken to implement this Update are linked to pre-arranged planning processes, in that they will be undertaken as part of these processes or help inform them. Such processes include the district plan reviews underway for Selwyn and Waimakariri, the full review of the CRPS scheduled for notification in 2022, and the statutory requirement from the NPS-UDC for another Capacity Assessment to be prepared in 2020.

### Schedule of future work

No.	Description	Lead Partners	Timeframe
<b>STRENGTHEN OUR PARTNERSHIP APPROACH</b>			
1	Work with the Government to further explore opportunities to develop an agreement on the priority actions and investments that will contribute towards an agreed set of growth and wellbeing outcomes for Greater Christchurch. <b>Linked processes: Second stage of the Government Policy Statement on Land Transport</b>	All GCP Partners	2019
2	Work with Government and social and affordable housing providers to better address current and future housing needs across Greater Christchurch, developing an action plan to increase provision, <del>and</del> investigate the most suitable locations and opportunities for new housing ownerships models (such as shared ownership, co-housing, etc). <u>This would be prepared in accordance with the following timeframes</u> <ul style="list-style-type: none"> <li>• <u>an MOU with the GCP and Network July 2019</u></li> <li>• <u>A project plan and project lead resource August 2019</u></li> <li>• <u>A good practice and/or barriers research component October 2019</u></li> <li>• <u>A forum and or consultation component December 2019</u></li> <li>• <u>A draft action plan February 2020</u></li> <li>• <u>Integration and alignment with District Plan Reviews April 2020</u></li> <li>• <u>Integration and alignment with Annual Plans June 2020</u></li> </ul> <b>Linked processes: Next Capacity Assessment, Selwyn and Waimakariri District Plan Reviews and Council's Long Term Plans</b>	CCC, SDC, WDC	2019 - 2020
<b>IMPROVE OUR TOOLS AND EVIDENCE BASE</b>			
3	<u>Undertake an evaluation of the appropriateness of existing minimum densities specified in the CRPS for each territorial authority including a review of what has been achieved to date, constraints and issues associated with achieving these minimum densities, and whether any changes to minimum densities is likely to be desirable and achievable across future development areas in Selwyn and Waimakariri districts.</u> <b>Linked processes: Canterbury Regional Policy Statement review, Selwyn and Waimakariri District Plan Reviews</b>	SDC, WDC, CCC, ECan.	2019-2022

Commented [MLPC25]: Submission #16

43	<p><del>Develop and agree a investigate the opportunity for a</del> single growth model for Greater Christchurch that evaluates the demand, supply, feasibility and sufficiency of residential and business development capacity.</p> <p><b>Linked processes: Next Capacity Assessment and Council's Long Term Plans</b></p>	CCC, SDC, WDC, ECan	2019 - 2020
54	<p>Review and recalibrate the Christchurch Transport Model and Christchurch Assignment and Simulation Traffic Model.</p> <p><b>Linked processes: Next Capacity Assessment and Council's Long Term Plans</b></p>	CCC, SDC, WDC, ECan, NZTA	2019 - 2020
65	<p>Prepare a new Housing and Business Development Capacity Assessment that provides up-to-date information on current and future housing and business trends.</p> <p><b>Linked processes: National Policy Statement on Urban Development Capacity, and Selwyn and Waimakariri District Plan Reviews</b></p>	CCC, SDC, WDC, ECan, Ngai Tahu	2020
<b>BUILD ON OUR PLANNED DIRECTION FOR GROWTH</b>			
76	<p>Insert relevant housing targets directly into the Canterbury Regional Policy Statement and District Plans, in accordance with NPS-UDC Policies PC5 to PC11.</p> <p><b>Linked processes: adoption of Settlement Pattern Update</b></p>	ECan, CCC, SDC, WDC	2019
87	<p>Improve the alignment and integration of constituent partner council's infrastructure strategies through a coordinated approach that is guided by an overarching sub-regional approach to infrastructure planning and delivery.</p> <p><b>Linked processes: Council's Annual Plans and Long Term Plans</b></p>	CCC, SDC, WDC	2019 - 2021
98	<p><del>a. Selwyn and Waimakariri District Councils to undertake structure planning and review of District Plans over the next year for identified Future Development Areas in the 2019 CRPS Change set out in Action 9b below, at a minimum residential density of 12 households per hectare, informed by the evaluation undertaken as Action 3 above.</del></p> <p>a. Prepare a Proposed Change to Chapter 6 of the CRPS at the earliest opportunity at the earliest opportunity to:</p> <ul style="list-style-type: none"> <li>- _____ modify Map A to identify the Future Urban Development Areas shown in Figure 15, and include a policy in Chapter 6 of the CRPS that enables land within the Future Development Areas to be rezoned in District Plans for urban development if there is a projected shortfall in housing development capacity in Table 3 of Our Space, or if the capacity assessment referred to in Action 6 (or subsequent periodic capacity assessments) identifies a projected shortfall in feasible development capacity.</li> <li>- _____ enable territorial authorities to respond to changes in the sufficiency of development capacity over the medium term on a rolling basis as a result of periodic capacity assessments</li> </ul> <p>Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:</p> <p>b. Selwyn and Waimakariri District Councils to undertake structure planning (including the consideration of development infrastructure and the downstream effects on the Greater Christchurch transport network) and review of District Plans over the next year for the identified Future Development Areas in the 2019 CRPS Change set out in Action 9a above, to provide for the projected medium term shortfall shown in Table 3 or the capacity assessment referred to in Action 6 (or subsequent periodic capacity assessments), at a minimum residential density of 12 households per hectare, informed by the evaluation undertaken as Action 3 above.</p> <p>The policy will sit within the existing objective and policy framework of Chapter 6 of the CRPS which applies to all local authorities in the Greater Christchurch Area, and which, in relation to the integration of land use and transport, includes policies 6.3.3, 6.3.4 and 6.3.5.<sup>31</sup></p> <p>_____ identify areas for future growth over the long term</p>	ECan, SDC, WDC	2019

Formatted: Strikethrough

<sup>31</sup> Policy 6.3.3 requires that development proceed in accordance with an outline development plan. In addition, Policy 6.3.4 promotes transport effectiveness, and Policy 6.3.5 relates to the achievement of land-use and transport integration by "ensuring that the nature, timing and sequencing of new development are co-ordinated with development, funding, implementation and operation of transport and other infrastructure..."

Formatted: Font: +Body (Calibri), 8 pt, Italic, English (United States)

	<ul style="list-style-type: none"> <li><del>consider the appropriateness of including revised minimum densities for future development areas</del></li> <li><del>ensure the quantum of additional development capacity sequenced by territorial authorities for each town is in accordance with meeting the medium term housing targets</del></li> <li>• <del>enable territorial authorities to respond to changes in the sufficiency of development capacity over the medium term on a rolling basis as part of periodic capacity assessments address any need for additional housing development capacity over the medium term.</del></li> </ul> <p><b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b></p>		
109	<p>Undertake detailed planning work for <a href="#">(in accordance with directions outlined in CRPS Chapter 6 and the proposed change identified in Action 9)</a> the relevant Greater Christchurch towns in Selwyn and Waimakariri, including:</p> <ul style="list-style-type: none"> <li>▪ Evaluating zoning options to further promote consolidated townships;</li> <li>▪ Investigating opportunities to encourage the provision and uptake of a range of housing typologies to meet future demands, including considering options for redevelopment, intensification and kāinga nohoanga;</li> <li>▪ Reviewing town centre masterplans and strategies, and exploring options to increase land supply for existing key activity centres</li> </ul> <p><b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b></p>	SDC, WDC	2019 - 2023
110	<p>Facilitate the redevelopment of existing urban areas in Christchurch City through the:</p> <ul style="list-style-type: none"> <li>▪ Implementation of the 8011 Central City Residential Programme;</li> <li>▪ Development and implementation of a redevelopment programme for medium density housing areas around key activity centres and along public transport corridors;</li> <li>▪ Investigation of opportunities for transition of brownfield land for commercial and mixed use redevelopment</li> </ul> <p><b>Linked processes: Christchurch City Council's Long Term Plan</b></p>	CCC	2019 - 2028
124	<p>Undertake a review of Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement as part of the scheduled full review, being informed by further planning work being undertaken by Councils and responding to any identified needs in the next Capacity Assessment due to be completed in 2020.</p> <p><a href="#">Environment Canterbury will, prior to notification, engage with submitters on Our Space who sought the inclusion of land for business or housing development in relation to the appropriateness of including the subject land within Map A of Chapter 6.</a></p> <p><b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b></p>	ECan	2022

**Commented [MLPC26]:** Submissions #26, #27, #28, #50, #53, #59, #73

[In relation to Action 12, the following schedule of work is proposed.](#)

**Commented [MLPC27]:** Officers' reply Section 13.

<b>Year 1</b> <b>2019/2020</b>	<a href="#">Project Plan and agreed scope for review</a>
<b>Year 2</b> <b>2020/2021</b>	<p><a href="#">Completion of efficiency and effectiveness (RMA s35) review</a></p> <p><a href="#">Completion of efficiency and effectiveness (RMA s35) review</a></p> <p><a href="#">Collation of existing evidence base and identification of information gaps (based on District Plan reviews and structure planning completed)</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Additional technical evidence completed (if required) – for chapter 6 specifically</a></li> <li>• <a href="#">Density</a></li> <li>• <a href="#">Transport</a></li> <li>• <a href="#">Natural Hazards – including climate change and additional land areas required from</a></li> <li>• <a href="#">Southshore project</a></li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">Settlement pattern</a></li> </ul> <a href="#">Initial engagement with strategic partners</a> <a href="#">Agreed partner and stakeholder engagement plan – pre-notification engagement</a>
<b>Year 3</b> <a href="#">2021/2022</a>	<a href="#">Draft Chapter 6 prepared for clause 3 Schedule 1 RMA consultation</a> <a href="#">Section 32 Report completed</a> <a href="#">Notification of Proposed Chapter 6 as part of full RPS review June 2022</a>
<b>Year 4</b> <a href="#">2022/2023</a>	<a href="#">Submission and Further Submission</a> <a href="#">Preparation of Officers' Report</a> <a href="#">Hearing</a> <a href="#">Decision expected in June 2023</a>

### 6.3 Collaborative partnerships

Opportunities and challenges facing Greater Christchurch in relation to how we will achieve our desired urban growth outcomes cross the administrative boundaries of Christchurch City, Selwyn and Waimakariri, and encompass a range of economic, social, cultural and environmental matters. Collaboration between local and regional councils, government agencies and Te Rūnanga o Ngai Tahu will therefore continue to be essential to successfully plan for growth.

The Partnership is committed to showing visible leadership and using a collaborative approach to address the growth issues identified for Greater Christchurch. Governance and implementation of this Update will be coordinated through groups at various levels of the Partnership, with the Greater Christchurch Partnership Committee responsible for its overall delivery. Although the implementation of this Update will principally be the domain of the constituent partner councils, other government agencies, mana whenua, the private sector, [the third sector](#) and the community also have a key role to play in ensuring we realise our shared vision for the future.

Coordinated action between public and private sector infrastructure providers, and the development sector, will be of particular importance to enabling the type and scale of development needed to accommodate our growth needs. It will be crucial that future investments are aligned with our planned direction for growth, which will require strong working relationships between constituent partner councils, infrastructure providers, developers and the property sector.

Building on the close ties already developed through the earthquake recovery, a strong working partnership with the Government will also be pivotal to unlocking the opportunities and addressing the challenges for Greater Christchurch. The Partnership will work closely with relevant agencies and ministries to explore how the Government could support urban development in Greater Christchurch in a way that both aligns with our future aspirations and the Government's bold intentions for New Zealand's cities, as signalled in the Urban Growth Agenda.

Partnering with the Government will include exploring the opportunity for developing an agreement on transport's role in shaping the future of Greater Christchurch, recognising that transport can be a key place-maker for urban areas. This partnership opportunity has already been signalled in the Government Policy Statement on Land Transport.

Commented [MLPC28]: Submissions #37 #42

## 6.4 Research and monitoring

The Partnership has produced an extensive evidence base to better understand housing and business trends in Greater Christchurch, and inform the planning decisions set out in this Update. This has included monitoring a range of urban development indicators and preparing a Housing and Business Development Capacity Assessment.

It will be critical that the data and information used as the basis for future strategic planning continues to be refined to support a robust and up-to-date evidence base.

Examples of matters that will require further investigation include:

- Reviewing the 2018 Census results to identify any changes to the population, including to demographic and household profiles, and consider the suitability of the population projections used to underpin our strategic planning;
- Examining the key demand and supply-side factors influencing the housing market, such as preferences by location, constraints on the redevelopment market and the extent of interactions between local housing market areas;
- Interrogating the factors influencing the relative feasibility of developments in different local housing market areas, including testing these factors with local experts and considering how they may change over time;
- Investigating the key drivers for business and employment development in relevant towns in Selwyn and Waimakariri, and the viable options for increasing the self-sufficiency of these growing towns.

The Partnership publishes quarterly monitoring reports to track a series of core urban development indicators for Greater Christchurch. To improve our understanding of local market trends, the scope of these monitoring reports will be reviewed and expanded where appropriate to incorporate additional indicators. Monitoring trends and changes in Greater Christchurch's residential, commercial and industrial markets are particularly important given the disruptions caused by the earthquakes, and the new normal that is being established as the recovery and regeneration effort progresses. It is important that this monitoring integrates with other monitoring processes at local and regional levels that will collectively help assess the achievement of the strategic goals of the UDS.

Commented [MLPC29]: Officers' reply Section 4

**He muka harakeke, he whītau tangata.**

The harakeke is woven with the human strand – binding people and places together.

DRAFT

**APPENDIX 3 – Hearing Panel Minutes 1, 2 & 3**

## **BEFORE THE HEARINGS PANEL**

**UNDER** Part 6 of the Local Government Act 2002

**AND**

**IN THE MATTER** of hearings on Our Space: Greater Christchurch  
Settlement Pattern Update 2018-2048

---

### **MINUTE 1 OF THE HEARINGS PANEL**

**Dated 8 February 2019**

---

#### **INTRODUCTION**

- 1 As set out in the note to submitters dated 10 December 2018, the Greater Christchurch Partnership (**GCP**) Committee established a hearings panel for the Our Space 2018-2048 Greater Christchurch Settlement Pattern Update comprising the following representatives:
  - (a) Bill Wasley, GCP Independent Chair (Chair)
  - (b) Councillor Peter Skelton, Canterbury Regional Council
  - (c) Councillor Sara Templeton, Christchurch City Council
  - (d) Deputy Mayor Malcolm Lyall, Selwyn District Council
  - (e) Councillor Neville Atkinson, Waimakariri District Council
  - (f) Gail Gordon, Te Rūnanga o Ngāi Tahu (Ngāti Wheke)
  - (g) Ta Mark Solomon, Canterbury District Health Board
  - (h) Jim Harland, New Zealand Transport Agency.
- 2 The Hearings Panel is a subcommittee of the GCP Committee. Its role is to consider public submissions and the advice contained in an

Officers' Report and make recommendations to the GCP Committee on the draft document released for public consultation throughout 2018.

3 The Hearings Panel has reviewed a list of submitters and have identified those submitters with whom the Hearing Panel have had current or previous associations:

(a) Councillor Sara Templeton

(i) Councillor of Christchurch City Council

(b) Ta Mark Solomon

(i) Deputy Chair of Canterbury District Health Board

#### **Christchurch City Council and Canterbury District Health Board**

4 The Hearings Panel has carefully considered the role of Councillor Sara Templeton and Ta Mark Solomon on the Hearings Panel in light of the submissions lodged by Christchurch City Council and the Canterbury District Health Board. The Panel has sought legal advice on this matter to confirm that there is no conflict of interest arising. This has been provided as an attachment to the Officers' Report.

5 Both Councillor Templeton and Ta Mark Solomon have confirmed that they were not involved in the preparation or subsequent approval of the submissions lodged by their respective organisations. In particular, the CCC submission has been lodged under delegated authority and has not been the subject of a council resolution. Therefore, the Hearing Panel is satisfied that there is a sufficient degree of separation between Councillor Templeton and Ta Mark Solomon and the submissions lodged by CCC and CDHB.

6 Councillor Templeton and Ta Mark Solomon, together with the other Hearing Panel Members, have also confirmed that they do not have a personal interest in the final form of the Our Space document.

7 Each member of this Hearings Panel is committed to approaching the hearing and consideration of submissions with an open mind and giving the views presented due consideration.

8 The Panel also notes in relation to the Officers' Report that CCC and CDHB staff have not been involved in dealing with matters raised in

their respective submissions and that CCC and CDHB staff involvement in matters not raised in their submissions has also been limited to officers who had not been involved in the preparation of their organisation's submission.

### **Conclusion**

- 9 The Hearings Panel is satisfied, subject to any matter submitters might raise, that any perceived conflicts of interest can be dealt with by this disclosure, and there is no need for any Panel member to recuse themselves from considering and determining any of the submissions.
- 10 If any submitter takes a different view, or wishes to raise additional matters, they are to alert the Hearings Panel as a matter of urgency.

**DATED** this 8th day of February 2019

A handwritten signature in black ink, appearing to read 'Bill Wasley', with a stylized initial 'W'.

**Bill Wasley**  
Hearing Panel Chair

## **BEFORE THE HEARING PANEL**

**UNDER** Part 6 of the Local Government Act 2002

**AND**

**IN THE MATTER** of hearings on Our Space: Greater Christchurch  
Settlement Pattern Update 2018-2048

---

### **MINUTE 2 OF THE HEARING PANEL**

**Dated 7 March 2019**

---

#### **INTRODUCTION**

- 1 The Hearing Panel would like to thank all those who have attended the hearing on Our Space 2018-2048 Greater Christchurch Settlement Pattern Update and acknowledge the work that has gone into the preparation of presentations.
- 2 Officers will be presenting their Reply Report on Monday, 11 March 2019. This will be held in public and submitters are welcome to attend and hear the presentation from the Officers.
- 3 This Minute seeks specific consideration in the Officers' Reply of a number of matters of particular interest to the Panel. It is not an exhaustive list and should not be taken to in any way limit the scope of the Officers' Reply, or any further questions that the Panel may wish to pose to the Officers. There may also be questions of any Partner Officers.

#### **HEARING PANEL QUESTIONS**

- 4 In light of the additional information and presentations from submitters and the discussion as part of the hearing of submitters, we would like

Council Officers to consider whether any changes are required to Our Space on the following matters:

- (a) The approach to sequencing in Our Space, including whether to show, if required, any FDA land as being GPA land on Figures 15 and 16.
- (b) The assessment of commercial and industrial land underpinning Our Space, and any subsequent changes resulting, including in relation to the anticipated demand at the inland ports at Rolleston. In addition, advice on the appropriateness or otherwise regarding the methodology used for determining industrial and commercial land requirements, given concerns raised by submitters.
- (c) The assessment of feasible development underpinning Our Space, and any subsequent changes resulting, especially in relation to land in GPAs and FDAs which might be TC2/3 land and the possibility that this might not be developed.
- (d) The extent of monitoring and review outlined in Our Space and how this might relate to other related monitoring undertaken through other processes, including how this might inform a future understanding of whether Our Space outcomes are being achieved.
- (e) The approach taken to assess rural residential and large lot demand and sufficiency and the rationale for the approach adopted.
- (f) The approach to determining appropriate densities for GPA and FDA land in Our Space and any subsequent processes.
- (g) The extent to which Our Space covers and addresses freight needs, including appropriate identification and protection of the strategic transport network and mitigation of potential increased congestion on this network arising from the proposals outlined in Our Space.
- (h) The extent to which the proposed social and affordable housing action plan is outlined in Our Space, including the timeframe for its development.

- (i) The coverage of the 10-minute neighbourhood concept and how this is explained in Our Space and implemented through subsequent actions, including its relation to the “8-80” concept promoted at the hearings.
  - (j) To simplify Our Space to ‘strip out’ any content not specifically relating to meeting NPS-UDC objectives.
  - (k) The extent to which natural hazards information is covered in Our Space and included as part of assessing the proposed directions outlined.
  - (l) The manner in which Figure 16 identifies proposed future growth areas and the potential for confusion of this Figure with Map A in the CRPS.
  - (m) How matters not addressed in the proposed Our Space approach might be identified and further detailed in relation to further investigation and resolution ahead of the planned CRPS full review in 2022.
  - (n) The role and scope of Our Space having regard to the requirements of the NPS-UDC.
- 5 The Panel would also like Officers to address any other matters that they wish to raise in relation to further amendments to Our Space or reasons why Officers do not believe relief sought by submitters should not be provided.
- 6 The Panel would also be assisted by further information with regard to the assertion by Christchurch International Airport and Lyttelton Port Company that they were not approached or consulted during the Our Space project.

#### **OFFICER REPLY DAY**

- 7 The presentation of the Officers’ Reply is scheduled for:

Time: 10am

Date: 11 March 2019

Location: Committee room 1, Civic Offices, 53 Hereford Street,  
Christchurch

ISSUED by the Hearing Panel

**DATED** this 7th day of March 2019

A handwritten signature in black ink, appearing to read "Bill Wasley". The signature is written in a cursive style with a large initial "W".

**Bill Wasley**

Hearing Panel Chair

on behalf of the Hearing Panel

## BEFORE THE HEARING PANEL

**UNDER** Part 6 of the Local Government Act 2002

**AND**

**IN THE MATTER** of hearings on Our Space: Greater Christchurch  
Settlement Pattern Update 2018-2048

---

### MINUTE 3 OF THE HEARING PANEL

**Dated 11 March 2019**

---

#### **Introduction**

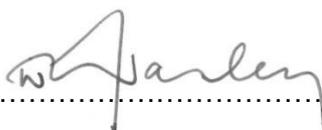
- 1 In our Minute 2, we requested that the authors of the Officers' Report respond to a number of questions from the Hearing Panel following the hearing of submissions. We heard from Officers who presented their responses to us this morning and we are grateful for the work that has been done in preparation of that response.
- 2 We are mindful that *Our Space* is a collaborative document of the Greater Christchurch Partnership and that differing views have been expressed on behalf of the local authority partners in relation to some of the key issues for our consideration. These views have been expressed through written comments by Selwyn and Waimakariri District Council staff and the submission lodged by Christchurch City Council (**CCC**).
- 3 In light of submitter presentations and the final recommendations of Officers in response to our questions, we would like to understand whether these differing views remain.

## **Joint Statement**

- 4 We request that the Chief Executives of each of the local authority partners liaise, and if possible, produce a Joint Statement that records their views on the Officer recommendations and where there is a difference of views, identifies how those outstanding matters may be addressed, for example, through further workstreams or other actions.
- 5 We would be assisted if those Chief Executives who are available could present that Joint Statement to us in the afternoon of Monday 11, March 2019 or during the morning of 12 March 2019. The Panel will accommodate the Chief Executives' availability.
- 6 This will be a public session in Committee Room 1, Christchurch City Council Civic Offices, 53 Hereford Street, Christchurch and submitters are welcome to attend.

ISSUED by the Hearing Panel

**DATED** this 11th day of March 2019



.....

**Bill Wasley**

Hearing Panel Chair  
on behalf of the Hearing Panel

## **APPENDIX 4 - Addendum to the Report and Recommendations of the Hearings Panel**

# **OUR SPACE 2018-2048**

## **GREATER CHRISTCHURCH SETTLEMENT PATTERN**

### *Whakahāngai O Te Hōrapa Nohoanga*

**A strategy prepared under the Local Government Act 2002 to give effect to the requirements of the National Policy Statement on Urban Development Capacity 2016**

**Addendum to Report and Recommendations of the Hearings Panel**

#### **Hearings Panel:**

**Bill Wasley (Chair)**

**Gail Gordon**

**Councillor Sara Templeton**

**Deputy Mayor Malcolm Lyall**

**Councillor Peter Skelton**

**Councillor Neville Atkinson**

**Jim Harland**

[this page is intentionally blank]

## INTRODUCTION

- [1] At its meeting on 31 May 2019, the Greater Christchurch Partnership (**GCP**) Committee received our Report and Recommendations of the Hearings Panel on Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (Whakahāngai O Te Hōrapa Nohoanga) ('the Strategy', 'Our Space') dated 3 May 2019.
- [2] Following receipt of the Hearing Panel's recommendations, the GCP Committee requested that the Hearings Panel provide clarification on its recommendations in relation to the following matters:
- a. The scope and intention of the change to Chapter 6 of the Canterbury Regional Policy Statement scheduled for 2019 referred to in Action 9 of the 'Schedule of future work' in Schedule 6.2 of Our Space and whether it is intended that only land required to meet an identified medium term shortfall in capacity will be rezoned in district plans.
  - b. The timeframe for the commencement of the evaluation of minimum densities referred to in the 'Schedule of future work' in Schedule 6.2 of Our Space and whether it is intended that this work inform the district plan reviews.
  - c. The Hearing Panel's response to the Christchurch City Council (**CCC**) submission in relation to the robustness of the Capacity Assessment.
  - d. The Hearing Panel's response to the CCC submission in relation to the sequencing of development and the management of downstream effects within the transport network.
- [3] In relation to the sequencing of development and the management of downstream effects within the transport network, the GCP Committee sought further clarification as to how these matters are intended to be addressed in Action 9 of Our Space.
- [4] The Hearings Panel met on 31 May and 5 June 2019 to consider these requests. This addendum report provides the Hearing Panel's clarification in respect of these matters. We have not reconsidered the conclusions reached as part of our deliberations. Rather, we have reflected on whether our recommendations, and reasons for those recommendations, are clearly articulated in Our Space and our Recommendations Report and if not, whether further clarification is required.
- [5] We address each of the four requested matters of clarification below. Where we have recommended changes to Our Space for the purposes of clarification, we have set these out in **Appendix A**.

**1. *The scope and intention of the change to Chapter 6 of the Canterbury Regional Policy Statement scheduled for 2019 referred to in Action 9 of the 'Schedule of***

***future work' in Schedule 6.2 of Our Space and whether it is intended that only land required to meet an identified medium term shortfall in capacity will be rezoned in district plans.***

- [6] We have reviewed the relevant sections of Our Space that refer to the change to Chapter 6 of the Canterbury Regional Policy Statement (**CRPS**) that is scheduled to be progressed by Environment Canterbury at the earliest opportunity this year.
- [7] Our understanding from the material presented to us during the hearing is that the change will involve amendments to Map A to identify the Future Development Areas shown on Figure 15 in Our Space. These Future Development Areas are intended to meet both medium and long-term capacity needs. However, the change to Chapter 6 of the CRPS will also include an associated policy to ensure that only land required to meet an identified medium-term shortfall in capacity will be rezoned in district plans.
- [8] The change will enable Selwyn District Council and Waimakariri District Council to rezone land within the Future Development Areas to meet identified medium term capacity needs only. This means that Waimakariri District Council would be able to rezone land within the Future Development Areas in their upcoming district plan review to meet the medium-term capacity shortfall identified in Table 3 of Our Space. Land would not be rezoned to meet long term capacity needs. The policy is also intended to enable Selwyn and Waimakariri District Councils to rezone land in response to medium term capacity shortfalls identified in future periodic Capacity Assessments without needing to first seek a change to Map A of the CRPS.
- [9] We consider that this could be clarified further in Our Space, particularly in relation to the policy mechanism that is intended to accompany the identification of Future Development Areas on Map A.
- [10] We recommend making amendments to the following sections of Our Space to provide this clarification:
- a. Section 3.2 Housing, page 24
  - b. Section 5.1 Greater Christchurch's settlement pattern, page 33
  - c. Section 5.3 Selwyn and Waimakariri Towns, page 39
  - d. Section 6.2, Further work and implementation, Schedule of future work, Action 9, p 58
- [11] These recommended amendments are set out in full in **Appendix A**.

**2. The timeframe for the commencement of the evaluation of minimum densities referred to in the 'Schedule of future work' in Schedule 6.2 of Our Space and whether it is intended that this work inform the district plan reviews.**

[12] It is our understanding from the material presented to us throughout the hearing, including the Joint Statement of the Chief Executives, that the evaluation of minimum densities referred to in the 'Schedule of future work' in Schedule 6.2 of Our Space is intended to commence this year. Whilst that work is unlikely to be completed in time for the change to Chapter 6 of the CRPS scheduled for this year, the work will inform the district plan reviews for Selwyn and Waimakariri Districts and the full review of the CRPS.

[13] We note that Action 3 of the 'Schedule of future work' refers to a timeframe of 2022. We recommended that this be amended to 2019 to 2022 to more accurately reflect our understanding of the timeframe set out in the paragraph above. We also recommended that the linked processes be amended to include the district plan reviews.

[14] This recommended amendment is set out in full in **Appendix A**.

[15] We have also reflected on our recommended amendment to Section 5.3 on page 40 of Our Space where it states:

In the meantime, it is expected that new urban housing in Waimakariri and Selwyn will achieve a minimum net density of 12 households per hectare in Green Field Priority Areas, or where any further development area is subsequently zoned.

[16] We wish to reiterate that the expectation is that new urban housing in Waimakariri and Selwyn will achieve a minimum net density of 12 households per hectare. We have also identified an error in the above statement and recommend that it is amended to clarify our intention that the statement applies only to Future Development Areas that are subsequently zoned.

[17] This recommended amendment is set out in full in Appendix A.

**3. The Hearing Panel's response to the CCC submission in relation to the robustness of the Capacity Assessment.**

[18] We addressed the Capacity Assessment throughout our Recommendations Report and in particular, addressed the CCC's concern in relation to a misalignment in Our Space between the figures used for housing development capacity over the

medium term and the need for intervention.<sup>1</sup> We referred to the Officers Recommendations and recommended amendments to Table 3 to address these concerns.

[19] We consider that the uncertainties associated with feasible development capacity figures will be further addressed by further and ongoing refinement of the feasibility tools and the use of a common methodology in the next Capacity Assessment which is scheduled to be completed by December 2020. This is provided for by the following actions in Our Space:

4	Investigate the opportunity for a single growth model for Greater Christchurch that evaluates the demand, supply, feasibility and sufficiency of residential and business development capacity.  Linked processes: Next Capacity Assessment and Council's Long Term Plans	CCC, SDC, WDC, ECan	2019 - 2020
5	Review and recalibrate the Christchurch Transport Model and Christchurch Assignment and Simulation Traffic Model.  Linked processes: Next Capacity Assessment and Council's Long Term Plans	CCC, SDC, WDC, ECan, NZTA	2019 - 2020
6	Prepare a new Housing and Business Development Capacity Assessment that provides up-to-date information on current and future housing and business trends.  Linked processes: National Policy Statement on Urban Development Capacity, and Selwyn and Waimakariri District Plan Reviews	CCC, SDC, WDC, ECan, Ngai Tahu	2020

[20] This was supported by the Greater Christchurch Chief Executives who in their advice to the Hearings Panel recommended that the partners agree to a consistent methodology being used by all Greater Christchurch local authorities when completing required capacity assessments. For clarification an amendment has been made to Action 4 by the deletion of 'investigate the opportunity for' and replacement with 'Develop and agree'. This was an agreed position of the Panel however the change was not made in Our Space.

[21] Ongoing improvements to the evidence base provided by the Capacity Assessment and ongoing monitoring are anticipated by the NPS-UDC. On that basis, we are satisfied with the Officer's recommendations and consider that the Capacity Assessment is adequate for the present purpose, noting that if future Capacity Assessments show a shortfall in capacity, the local authorities will be required to respond by providing further development capacity and enabling development.

---

<sup>1</sup> Paragraphs [111] to [124]

Given the CRPS policy mechanism described above that will ensure that land within Future Development Areas is only rezoned in district plans to meet medium term capacity needs we consider the planning response to the Capacity Assessment to be appropriate.

#### **4. The Hearing Panel's response to the CCC submission in relation to the sequencing of development and the management of downstream effects within the transport network.**

[22] The management of downstream effects within the transport network was raised in the CCC submission in the context of sequencing land. Officers addressed the provision of greater certainty on sequencing of housing development in Appendix F of their report. They identified three options for consideration by the Panel with regard to sequencing:

- a. Retain the current approach as outlined in Our Space, or
- b. Provide additional direction in the final Our Space without the benefit of detailed structure planning and/or outline development plans of proposed future development urban areas), and/or
- c. Provide additional direction in the proposed 2019 change to the CRPS (with or without the benefit of detailed structure planning and/or outline development plans of proposed future development areas).

[23] We accepted the Officers' recommended amendments to Our Space to:

- a. Section 3.2, paragraph 5, p 12 to be clearer that the medium term targets represent the development capacity to be zoned or otherwise enabled by each territorial authority and that unless already enabled, additional development capacity required over the long term only need be identified, in order to provide greater planning certainty and ensure efficient infrastructure planning and delivery across Greater Christchurch.
- b. Section 5.5, p26 and Section 6 Action 9 p 34 to make it clear that detailed structure planning to determine the sequencing of future development areas will need to have regard to existing CRPS policy provisions to ensure a consolidated urban form, proximity to activity centres, efficient infrastructure, and cohesion of new development with existing communities.
- c. Section 5.5, p 26 and Section 6, Action 8 p 34 to outline the intent of draft policy provisions to be considered as part of a proposed change to the CRPS to demonstrate how future development areas are sequenced by territorial authorities in accordance with housing targets incorporated in the CRPS and sufficiency conclusions agreed as part of periodic capacity assessments.

[24] As set out above, we recommend further changes to further clarify the intent of the policy to be considered as part of the change to Chapter 6 of the CRPS.

[25] We agreed with Officers that Our Space should not determine the sequencing priority between future development areas and existing undeveloped greenfield areas or identify those parts of the future development areas to meet medium term

housing targets as this is best considered as part of the detailed structure planning and development infrastructure servicing to be undertaken by relevant territorial authorities.

- [26] We note that there is a suite of CRPS policies that apply to new development in Greater Christchurch regarding any off site effects and requiring the integration of land-use and transport matters. Policy 6.3.3 requires that development proceed in accordance with an outline development plan. In addition, Policy 6.3.4 promotes transport effectiveness, and Policy 6.3.5 relates to the achievement of land-use and transport integration by “ensuring that the nature, timing and sequencing of new development are co-ordinated with development, funding, implementation and operation of transport and other infrastructure...” in order to, among other things, “ensure new development does not occur until provision for appropriate infrastructure is in place.”
- [27] We further note that the review and recalibration of the Christchurch Transport Model and Christchurch Assignment and Simulation Traffic Model is scheduled for 2019 to 2020 and will inform the next Capacity Assessment and the Council’s Long Term Plans.<sup>2</sup> We have also recommended a number of amendments to Our Space in relation to the specific transport challenges faced by the Greater Christchurch local authorities.
- [28] We are satisfied that the approach in Our Space is appropriate given the evidence presented to us at the hearing, the actions identified in the ‘Schedule of future work’ and the requirement for local authorities to address this matter in subsequent resource management and local government act processes. However, we do consider that further clarification could be made to Action 9 to ensure that readers are clear that the down stream effects on the Greater Christchurch transport network will be considered as part of district council structure planning and that the new policy will sit within the existing objective and policy framework of Chapter 6 of the CRPS which already addresses the sequencing of development and its co-ordination with the development, funding, implementation and operation of transport and other infrastructure.
- [29] As a further point of clarification, we recommend that the definition of ‘development infrastructure’ be included in Section 3.2 in relation to housing targets on page 24 to make it clear that the development infrastructure required to service additional

---

<sup>2</sup> Our Space, Action 5.

capacity that will be identified in each council's infrastructure strategy includes land transport.

**For the Hearing Panel:**



**Bill Wasley**  
**Chair**



**Gail Gordon**  
**Panel member**



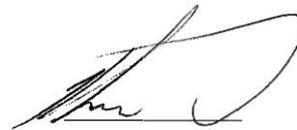
**Cr Sara Templeton**  
**Panel member**



**Deputy Mayor Malcom Lyall**  
**Panel member**



**Cr Peter Skelton**  
**Panel member**



**Cr Neville Atkinson**  
**Panel member**



**Jim Harland**  
**Panel member (non-voting)**

**Jim Harland is a non-voting member of the Hearing panel. His signature acknowledges that he has participated in deliberations as a non-voting member of the Panel and supports the recommendations set out in this Report.**

**5 June 2019**

## **APPENDICES**

- [30] **Appendix A:** Hearing Panel recommended amendments to Our Space to provide clarification on matters requested by Greater Christchurch Partnership Committee

## PROPOSED CHANGES TO OUR SPACE – 31 May and 5 June 2019

Proposed changes to Hearing Panel Recommendations Report version are shown in red underline and strikethrough

### **1. The scope and intention of the change to Chapter 6 of the Canterbury Regional Policy Statement scheduled for 2019 referred to in Action 9 of the 'Schedule of future work' in Schedule 6.2 of Our Space and whether it is intended that only land required to meet an identified medium term shortfall in capacity will be rezoned in district plans.**

*Section 3.2 Housing, page 24:*

In this context, the targets set out in Table 2 for Christchurch City, Selwyn and Waimakariri represent the development capacity that each council will, over the medium term, zone and otherwise, seek to enable through their relevant planning processes and mechanisms (district plans, structure plans, outline development plans and infrastructure strategies) and over the long term, identify in relevant plans and strategies, to meet the demand for housing in Greater Christchurch over the medium and long term.<sup>14</sup> A change to the Canterbury Regional Policy Statement in 2019 will include a policy that will enable land required to meet an identified medium term capacity need to be rezoned in district plans. Unless already enabled, additional development capacity required over the long term will only be shown on Map A of the Regional Policy Statement as a Future Development Area, identified in relevant plans and strategies, and the development infrastructure required to service it will be identified in each council's infrastructure strategy.

<sup>14</sup> Table 2 will be inserted in the Canterbury Regional Policy Statement in Chapter 6 (Recovery and Rebuilding of Greater Christchurch). Relevant local authority targets will also be inserted into the district plans for Christchurch City, Selwyn and Waimakariri.

*Section 5.1 Greater Christchurch's settlement pattern, page 33:*

To implement this plan, the Partnership ~~proposes~~ considers that some new greenfield housing areas should be released or otherwise identified in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls for Selwyn and Waimakariri over the medium to long term.

*Section 5.3 Selwyn and Waimakariri Towns, page 39:*

Given the projected shortfalls in housing development capacity in Selwyn and Waimakariri to meet their future needs, a change to the CRPS is proposed to allow Chapter 6 and Map A the flexibility to respond to identified medium term capacity needs. Additional capacity will be directed in the first instance to the key towns of Rolleston, Rangiora and Kaiapoi in support of the public transport enhancement opportunities mentioned elsewhere in this Update. This is likely to identify future development areas in the two districts that are within the Projected Infrastructure Boundary. Such a change would be prepared subsequent to this Update and would likely be notified in 2019.<sup>23</sup> These new areas will provide much of the capacity required over both the medium and long term. A 2019 change to the CRPS would ensure that land can be rezoned to meet medium term capacity needs, and the longer term will be further considered as part of a comprehensive review of the CRPS scheduled for 2022. While it is intended Our Space provides direction to inform future Resource Management Act processes, Figure 16 is indicative only.

<sup>23</sup> The Partnership is investigating whether to request using the new streamlined planning provision in the Resource Management Act 1991 to make this targeted change to the Regional Policy Statement.

Section 6.2, Further work and implementation, Schedule of future work, Action 9, p 59

~~a. Selwyn and Waimakariri District Councils to undertake a structure planning and review of District Plans over the next year for identified Future Development Areas in the 2019 CRPS Change set out in Action 9b below, at a minimum residential density of 12 households per hectare, informed by the evaluation undertaken as Action 3 above.~~

~~b.a. Prepare a Proposed Change to Chapter 6 of the CRPS for notification by September 2019 at the earliest opportunity to:~~

- ~~- Modify Map A to identify the Future Urban Development Areas shown in Figure 15, and include a policy in Chapter 6 of the CRPS that enables land within the Future Development Areas to be rezoned in District Plans for urban development if there is a projected shortfall in housing development capacity in Table 3 of Our Space, or if the capacity assessment referred to in Action 6 (or subsequent periodic capacity assessments) identifies a projected shortfall in feasible development capacity.~~
- ~~- Enable territorial authorities to respond to changes in the sufficiency of development capacity over the medium term on a rolling basis as a result of periodic capacity assessments.~~

~~b. Selwyn and Waimakariri District Councils to undertake a structure planning (including the consideration of development infrastructure and the downstream effects on the Greater Christchurch transport network) and review of District Plans over the next year for the identified Future Development Areas in the 2019 CRPS Change set out in Action 9a above, to provide for the projected medium term shortfall shown in Table 3 or the capacity assessment referred to in Action 6 (or subsequent periodic capacity assessments), at a minimum residential density of 12 households per hectare, informed by the evaluation undertaken as Action 3 above.~~

~~The policy will sit within the existing objective and policy framework of Chapter 6 of the CRPS which applies to all local authorities in the Greater Christchurch Area, and which, in relation to the integration of land use and transport, includes policies 6.3.3, 6.3.4 and 6.3.5.<sup>1</sup>~~

**2. The timeframe for the commencement of the evaluation of minimum densities referred to in the ‘Schedule of future work’ in Schedule 6.2 of Our Space and whether it is intended that this work inform the district plan reviews.**

Section 6.2, Further work and implementation, Schedule of future work, Action 3, p 57

3	<p><u>Undertake an evaluation of the appropriateness of existing minimum densities specified in the CRPS for each territorial authority including a review of what has been achieved to date, constraints and issues associated with achieving these minimum densities, and whether any changes to minimum densities is likely to be desirable and achievable across future development areas in Selwyn and Waimakariri districts.</u></p> <p>Linked processes: Canterbury Regional Policy Statement review, <a href="#">Selwyn and Waimakariri District Plan Reviews</a></p>	SDC, WDC, CCC, ECan.	<a href="#">2019-2022</a>
---	---	-------------------------	---------------------------

<sup>1</sup> Policy 6.3.3 requires that development proceed in accordance with an outline development plan. In addition, Policy 6.3.4 promotes transport effectiveness, and Policy 6.3.5 relates to the achievement of land-use and transport integration by “ensuring that the nature, timing and sequencing of new development are co-ordinated with development, funding, implementation and operation of transport and other infrastructure...”

Section 5.3, Selwyn and Waimakariri Towns, page 40:

Amend Section 5.3 as follows:

In the meantime, it is expected that new urban housing in Waimakariri and Selwyn will achieve a minimum net density of 12 households per hectare<sup>[x]</sup> ~~in Green Field Priority Areas, or~~ where any ~~Future Development Area~~ is subsequently zoned.

[x] This expectation is that a minimum density of at least 12 households per hectare will be achieved.

**3. The Hearing Panel’s response to the CCC submission in relation to the robustness of the Capacity Assessment.**

Section 6.2, Further work and implementation, Schedule of future work, Action 4, p 58

Amend Action 4 as follows:

4	<p><del>Investigate the opportunity for</del> <u>Develop and agree</u> a single growth model for Greater Christchurch that evaluates the demand, supply, feasibility and sufficiency of residential and business development capacity.</p> <p>Linked processes: Next Capacity Assessment and Council’s Long Term Plans</p>	CCC, SDC, WDC, ECan	2019 - 2020
---	--	------------------------	-------------

- Further clarification also provided in addendum to Hearing Panel Recommendations Report.

**4. The Hearing Panel’s response to the CCC submission in relation to the sequencing of development and the management of downstream effects within the transport network.**

Section 6.2, Further work and implementation, Schedule of future work, Action 4, p 58

Amend Action 9 as set out above in response to recommendation 1.

Section 3.2 Housing, Targets, page 24:

Insert definition of ‘development infrastructure’ as a footnote:

Development infrastructure means network infrastructure for water supply, wastewater, stormwater, and land transport as defined in the Land Transport Management Act 2003, to the extent that it is controlled by local authorities, and including the New Zealand Transport Agency.

- Further clarification also provided in addendum to Hearing Panel Recommendations Report.