



**Greater Christchurch  
Partnership**

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**Te Tira Tū Tahi**  
One Group, Standing Together

# **Draft Our Space 2018-2048: Greater Christchurch Settlement Pattern Update**

*Whakahāngai O Te Hōrapa Nohoanga*

Officers' Report

8 February 2019



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## 1. Introduction

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A draft *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga*, herein referred to as *Our Space*, was released for public consultation by the Greater Christchurch Partnership in November 2018.

This Officers' Report has been prepared to:

- briefly outline the purpose of *Our Space*
- document the future development strategy requirements of the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC) that relate to *Our Space*<sup>1</sup>
- describe the consultation and engagement process adopted for *Our Space*
- provide an officers' response to points made in the submissions received on *Our Space*
- provide officers' recommendations on proposed changes to *Our Space* to address submission points.

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

Officers have identified a number of themes arising from submissions and these have been considered collectively in Section 4 of the report. Responses to each individual submission (with reference to themed responses) are included in Section 6.

Proposed changes to *Our Space* as a result of officers' recommendations are collated in Section 5.

Officers' consider that the key questions that the Hearings Panel will need to determine in its recommendations include:

- has sufficient land to meet forecast needs for housing and business been identified, and is it in the right locations?
- is existing and future development capacity serviced or identified to be serviced in relevant Long Term Plans (LTPs) and associated infrastructure strategies?
- is existing and future development capacity feasible to develop?
- is the broad location, timing and sequencing sufficiently identified?
- does *Our Space* support the vision and principles of the Urban Development Strategy (UDS) and direction of the Canterbury Regional Policy Statement (CRPS) e.g. consolidated urban form and land use integrated with infrastructure?
- is the methodology/evidence base sufficiently robust, recognising the requirement for periodic review?
- is *Our Space* the right mechanism to address a submitter's concern? Is it a significant sub-regional issue and/or is it more appropriately considered through a resource management document (such as the CRPS or relevant district plan) or other processes under the LGA2002/LTMA2003?

The officers who have prepared this report are: Keith Tallentire, Sam Bellamy and Tammy Phillips (a summary of qualifications and experience is included in Appendix A). The responses and recommendations represent the officers' collective, consensus and independent expert opinion fully informed by the supporting material published as part of the *Our Space* consultation, the content of submissions and feedback received from partner staff (Christchurch City Council staff have provided feedback limited to points not covered in its submission). They are not necessarily the views held by other partner staff or partner organisations.

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<sup>1</sup> The 'future development strategy' terminology is a general term used as part of the NPS-UDC. To avoid the potential for confusion with the existing UDS, the future development strategy for Greater Christchurch was titled *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (Whakahāngai O Te Hōrapa Nohoanga)*.

## 2. Background

### Settlement pattern review project

In 2016, the Greater Christchurch Urban Development Strategy Partnership (now named the Greater Christchurch Partnership) endorsed an update to the 2007 UDS that responded to the significant events and changes that had occurred in Greater Christchurch (particularly in relation to the Canterbury earthquakes).

This update to the UDS did not attempt to revise the land use framework outlined for Greater Christchurch in the Land Use Recovery Plan (LURP) and in Chapter 6 of the CRPS. Instead, it contained a priority action relating to a comprehensive review of the UDS.

In 2017, the Greater Christchurch Partnership Committee endorsed the first phase of this review to focus on the settlement planning aspects needed to meet the requirements of the NPS-UDC. The main objective of this settlement pattern review project is 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.

A further objective seeks to ensure appropriate alignment between the settlement pattern review and:

- the District Plan Review underway in Selwyn District
- the District Development Strategy and District Plan Review underway in Waimakariri District
- the Christchurch District Plan
- the Greater Christchurch Transport Statement, Canterbury Regional Land Transport Plan and Canterbury Regional Public Transport Plan
- the development by councils of 2018-2028 Long Term Plans and 30 Year Infrastructure Strategies.

An overview of the broad approach to the settlement pattern review project can be accessed at:

[http://christchurch.infocouncil.biz/Open/2017/04/GCUC\\_20170407\\_AGN\\_1409\\_AT\\_WEB.htm](http://christchurch.infocouncil.biz/Open/2017/04/GCUC_20170407_AGN_1409_AT_WEB.htm)

### National Policy Statement on Urban Development Capacity

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).

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	Development capacity must be feasible, zoned and serviced with development infrastructure.
Medium Term	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	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.
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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.

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: <ol 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> </ol>
PA4	When considering the effects of urban development, decision-makers shall take into account: <ol 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> </ol>

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.

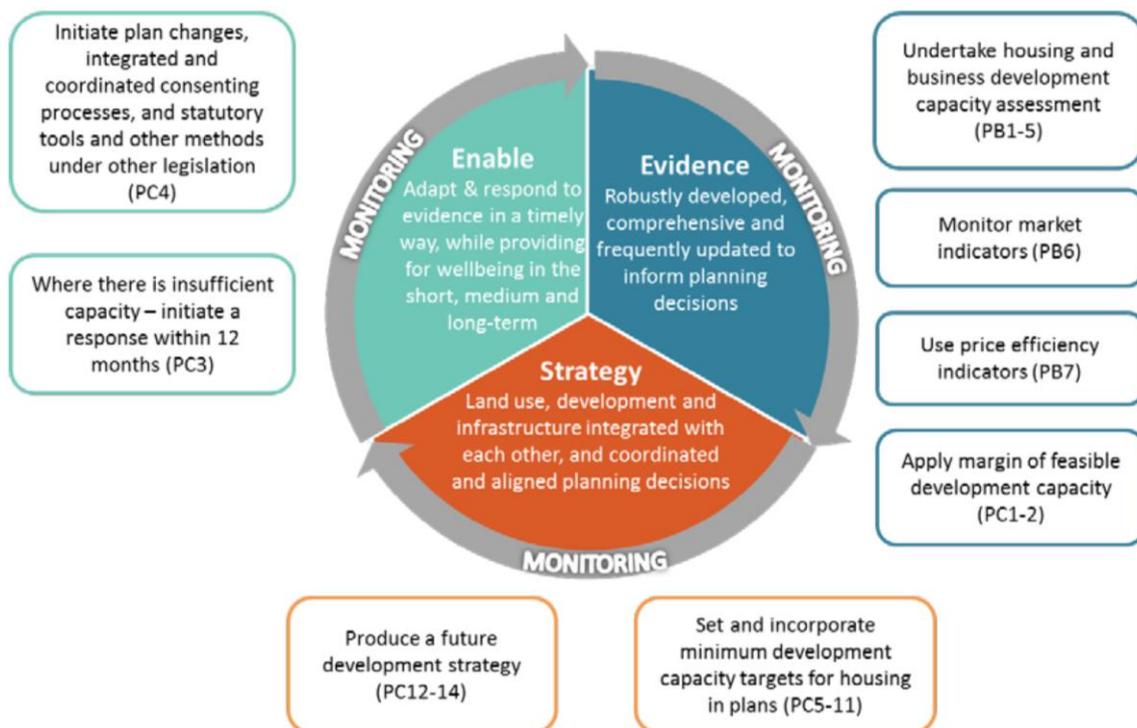
In 2016, the Christchurch urban area (which includes the towns of Prebbleton in Selwyn District and Kaiapoi in Waimakariri District) was defined by Statistics NZ as a high growth urban area.

Given the strategic planning arrangements that already exist between Greater Christchurch councils through the Partnership, it was agreed that the urban area covered by the UDS would be the geographic focus for the purposes of meeting the NPS-UDC requirements.

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

- commence quarterly monitoring of market indicators (PB6)
- complete a housing and business development capacity assessment (PB1 to PB5)
- produce a future development strategy (PC12 to PC14)
- set minimum housing targets in regional policy statements and district plans (PC5 to PC11).

Figure 1: Summary of NPS-UDC Policies



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.

### Evidence and monitoring

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 Partnership has met these two requirements, with links to the relevant outputs provided in the following table.<sup>2</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>

<sup>2</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*).

The NPS-UDC requires high growth 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.

### Responsive planning

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.

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: <ol 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> </ol>
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: <ol style="list-style-type: none"> <li>a) Undertake a consultation process that complies with:                             <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> </li> <li>b) be informed by the assessment under policy PB1; and</li> <li>c) have particular regard to policy PA1.</li> </ol>

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.

The NPS-UDC directs regional councils to incorporate minimum targets 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.

### Scope of the future development strategy

In 2017, the Ministry for the Environment (MfE) and the Ministry of Business, Innovation and Employment (MBIE) released guidance on the production and content of a future development strategy. This guidance can be accessed at: <http://www.mfe.govt.nz/sites/default/files/media/Towns%20and%20cities/Final-NPS-UDC-Future-Development-Strategy-guidance.pdf>

The guidance notes that a future development strategy should outline how sufficient development capacity in the medium and long term will be provided across a geographic area, and how the minimum targets for

sufficient housing development capacity can be met. It should identify any future urban environments and intensification opportunities, and the associated requirements for development infrastructure.

A future development strategy:

- should be developed collaboratively and co-operatively by all local authorities that share jurisdiction over an agreed geographic area
- will be developed in an integrated manner with input from infrastructure providers and involve consultation with iwi and hapū, stakeholders and the wider community
- clearly outlines how future development will be provided, and can inform changes to relevant Resource Management Act 1991 (RMA) plans, and statutory tools and methods under other legislation, including Long Term Plans (LTPs), Infrastructure Strategies under the Local Government Act 2002 (LGA), and Regional Land Transport Plans under the Land Transport Management Act 2003 (LTMA)
- is able to inform decision making by local authorities and infrastructure providers, and demonstrates that there will be sufficient development capacity opportunities enabled through district plans, LTPs and Infrastructure Strategies
- informs iwi and hapū, stakeholders and the wider community of the proposed path for future urban development and change.

Once complete, a future development strategy will be a guide for planners, decision makers, infrastructure providers, businesses and the community about future urban growth, potential constraints to urban growth and the opportunities and solutions to respond to growth over the next thirty years.

In this context, the guidance recommends that a future development strategy should contain the following to meet the requirements of the NPS-UDC:

- explicit reference to policy PA1 that requires local authorities to ensure that at any one time there is sufficient, feasible housing and business development capacity in the short, medium and long term
- the minimum targets for sufficient, feasible development capacity for housing that will be, or have been, included in regional policy statements and relevant territorial authority plans
- explicit reference to the housing and business development capacity assessment to demonstrate how any identified development capacity is sufficient and feasible
- evidence of analysis to determine where and when there are opportunities for development, informed by necessary assessment, scenario testing, constraints analysis, consultation and existing strategies
- a map and/or series of maps and tables outlining the location, timing and sequencing of development capacity (including any “no-go” areas where relevant)
- identification of the development infrastructure and other infrastructure required to support future development capacity
- implementation actions that outline how the future development strategy will be given effect through RMA, LGA and LTMA planning documents, and how infrastructure will be funded along with other non-statutory documents and processes
- a clear approach about how the future development strategy will be responsive to changes in demand for future urban development or where landowners’ intentions change
- a clear approach for monitoring both the urban development outcomes and the implementation of the future development strategy
- a short summary of how consultation on the future development strategy was undertaken.

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. This paper can be accessed at: [http://christchurch.infocouncil.biz/Open/2018/05/GCPC\\_20180511\\_AGN\\_2810\\_AT\\_WEB.htm](http://christchurch.infocouncil.biz/Open/2018/05/GCPC_20180511_AGN_2810_AT_WEB.htm)

This scoping paper outlined that the future development strategy would be guided by the vision, principles and strategic goals from the UDS, and would represent the integrated land use and infrastructure planning response to the findings of the capacity assessment.

It cited the principles that would shape the approach of the future development strategy as being that it:

- helps deliver and aligns with the vision for Greater Christchurch
- demonstrates a collaborative approach through leadership and partnership
- integrates, supports and builds on existing strategies and initiatives through an efficient, fit-for purpose and holistic process
- 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
- achieves the NPS-UDC requirements
- is informed by a robust evidence base and feedback from stakeholder and community engagement.

The Committee agreed that the production of the future development strategy and its related consultation process should occur using the LGA, with the consultation process undertaken in accordance with Part 6 of the LGA and the significance and engagement policies of partner councils.

The 'future development strategy' terminology is a general term used as part of the NPS-UDC. To avoid the potential for confusion with the existing UDS, the future development strategy for Greater Christchurch was titled *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (Whakahāngai O Te Hōrapa Nohoanga)*, herein referred to as *Our Space*.

## Key project milestones

Since the NPS-UDC came into effect in December 2016, the Partnership has achieved a series of milestones in relation to the settlement pattern review project and meeting the requirements of the NPS-UDC, as set out in the following table. These milestones culminated in consultation on *Our Space* in November 2018.

Date	Milestone
April 2017	The Committee endorsed the approach to undertaking the settlement pattern review project.
June 2017	The first Urban Development Indicators - Quarterly Monitoring Report was published.
September 2017	The second Urban Development Indicators - Quarterly Monitoring Report was published.
March 2018	The Committee endorsed the draft Summary Housing and Business Development Capacity Assessment.
April 2018	The third and fourth Urban Development Indicators - Quarterly Monitoring Reports were published.
May 2018	The Committee endorsed the scope and approach to producing a future development strategy.
September 2018	The Committee workshopped the approach and content of the draft future development strategy (titled <i>Our Space 2018-2048: Greater Christchurch Settlement Pattern Update</i> ).
September / October 2018	Partner organisations ratified <i>Our Space</i> for the purposes of consultation.
October 2018	The Committee adopted <i>Our Space</i> for the purposes of consultation.
November 2018	<i>Our Space</i> was released for public consultation.

Partners collaboratively prepared a draft *Our Space* for the purposes of consultation. In agreeing this consultation draft, individual partners had a variance of views on some matters and so sought to hear from stakeholders and the community on the information and proposals contained therein.

### 3. Consultation and engagement

Formal public consultation on *Our Space* took place from 1 November to 30 November 2018.

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

Supporting material, including the draft Capacity Assessment, an options assessment, an independent peer review of *Our Space*, and updated feasibility assessments for Selwyn and Waimakariri, were also published on the Partnership’s website and made available in hard copy on request.

Submissions were invited in written, electronic and audio format. An online submission form was provided that included nine consultation questions, as set out in the following table, seeking views on the key issues arising in *Our Space*.

Consultation Questions	
1	<i>Our Space</i> highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi. Do you agree or disagree with this approach and why?
2	<i>Our Space</i> adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri. Do you agree or disagree with this approach and why?
3	<i>Our Space</i> proposes to develop an action plan to increase the supply of social and affordable housing across Greater Christchurch and investigate with housing providers different models to make it easier for people to own their own home. What elements should be included in this action plan?
4	<i>Our Space</i> adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their viability and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri. Do you agree or disagree with this approach and why? What further measures would support such development?
5	The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified sufficient capacity for new industrial businesses. Do you agree or disagree this is sufficient and in the right location and why?
6	The proposals in <i>Our Space</i> are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy (including through business sector trends and impacts from technological change). Do you agree or disagree with our evidence base and why?
7	<i>Our Space</i> promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and an intention to deliver rapid transit along the northern and south-west transport corridors. Do you agree or disagree with this approach and why?
8	<i>Our Space</i> aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities. Do you agree or disagree with this approach and why? What more could be done to integrate infrastructure planning?
9	What other points do you wish to make to inform the final <i>Our Space 2018-2048: Greater Christchurch Settlement Pattern Update</i> ?

## Public notice and press release

A public notice setting out details of the consultation was placed in the following publications:

- The Press (on Wednesday 31 October and Saturday 3 November)
- The Star (on Thursday 1 November)
- Selwyn Times (on Tuesday 6 November)
- The News (formerly Hurunui News/North Canterbury News) (on Thursday 8 November)

To coincide with the consultation period, a media release was prepared and distributed to the above local media on Wednesday 31 October. The Press also published an article that featured the consultation on *Our Space* on Friday 23 November.

## Stakeholder mailout

On 1 and 23 November, emails were sent to over 550 key stakeholders informing them of the consultation. Such stakeholders included government departments, iwi authorities, property developers, social housing providers, requiring authorities, infrastructure providers, significant landowners, residents' associations and business associations.

The stakeholder database was established at the commencement of the settlement pattern review project and was used periodically throughout 2017 and 2018 to raise awareness of the work being undertaken to meet the requirements of the NPS-UDS. Relevant stakeholder information was obtained through reference to partner council's stakeholder databases and augmented with additional organisations needed to comply with policy PB5 of the NPS-UDC.<sup>3</sup>

Partner councils were able to forward these communications to further stakeholders. Waimakariri District Council also separately notified landowners within their proposed future development areas by letter.

## Webpage

A dedicated *Our Space* consultation webpage was established on the Partnership website in October 2018 and a submissions page "went live" on 31 October. Details of the consultation were also published on the websites of partner councils, with a direct link provided to the *Our Space* webpage.

Analysis of the website traffic shows that the *Our Space* webpage was viewed 840 unique times during the consultation period. The *Our Space* document was downloaded 837 times.

## Public drop-in sessions

The following four public information drop-in sessions were held during the consultation period:

- Rangiora Town Hall, Monday 12 November, 5.00-7.00pm
- Kaiapoi Service Centre, Tuesday 13 November, 5.00-7.00pm
- Selwyn District Council Offices, Wednesday 14 November, 3.30-6.30pm
- Christchurch City Council Civic Offices, Thursday 22 November, 5.30-7.30pm

The drop-in sessions were publicised on the Partnership and partner council's websites, as well as via an A5 flyer, mailouts, social media channels, the public notice and in the *Our Space* document itself. Despite this

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<sup>3</sup> Policy PB5 of the NPS-UDC requires local authorities to seek and use the input of iwi authorities, the property development sector, significant landowners, social housing providers, requiring authorities, and the providers of development infrastructure and other infrastructure when preparing a capacity assessment.

widespread communication, only ten people attended the drop-in sessions, including four in Rangiora, one in Kaiapoi, one in Rolleston and four in Christchurch.

## Stakeholder and partner engagement

A series of targeted stakeholder engagement sessions were held on *Our Space* throughout November. The feedback from stakeholder engagement on the previous phase of preparing a Capacity Assessment has also been considered as part of this Officers' Report.

### Stakeholder review workshop

A cross-sector stakeholder review workshop, facilitated by Community Public Health (CPH), was held on 26 November. This workshop was signalled as part of the formal consultation process agreed to by the Greater Christchurch Partnership Committee. A total of 25 invited participants attended the workshop from various economic, community, transport, development, building, education and business sectors.

The workshop was structured around an assessment of *Our Space* against the 14 themes in the Integrated Planning Guide, which is a tool developed by CPH and other agencies for considering the health impacts of projects, plans, policies and development proposals. The guide has been previously used as part of various earthquake recovery related processes. It adopts a similar, but more streamlined approach, to other more intensive integrated assessment methodologies.

Feedback from this workshop is included as Appendix B.

### Healthy Greater Christchurch seminar

On 12 November, a lunchtime seminar was held for Healthy Greater Christchurch signatories and the public. The seminar included a presentation and subsequent discussion on *Our Space*, and attracted 15 attendees. Participants were encouraged to consider making formal submissions given the discussion was not formally recorded.

### *Our Space* presentations

An overview of *Our Space* and the consultation was presented at the following meetings:

- Healthy Greater Christchurch Advisory Group (on Wednesday 24 October)
- Canterbury Government Leaders Group (on Friday 2 November)
- Waipounamu Community Housing Providers Network (on Thursday 22 November)
- Youth Councils and Youth Voice Canterbury (on Tuesday 27 November)

Christchurch City Council staff also provided presentations to a number of their local Community Boards.

### Ngāi Tahu engagement

Te Rūnanga o Ngāi Tahu is a partner in the Greater Christchurch Partnership, represented at a governance, chief executive and staff level throughout the preparation and finalisation of *Our Space*.

Te Rūnanga o Ngāi Tahu appointed Mahaanui Kurataiao Limited to contribute to *Our Space*, ensure mana whenua cultural values are reflected and considered as part of Greater Christchurch's settlement planning, and liaise with rūnanga kaitiaki throughout the process.

## Links with the Canterbury Regional Public Transport Plan

The draft Canterbury Regional Public Transport Plan (RPTP) was published for public consultation from 17 September until 14 October 2018. Consultation material produced for the draft RPTP included reference to the future development strategy being developed by the Greater Christchurch Partnership and highlighted linkages between the two strategic planning documents.

Over 700 submissions were received on the draft RPTP. A summary of the key submission themes from the consultation is included as Appendix C and, given the important linkages between land use and transport planning for Greater Christchurch, this feedback has also been considered as part of this Officers Report.

## Submissions

A total of 92 submissions, including four late submissions, were received from a range of individuals, groups and organisations in response to *Our Space*. Officers support the acceptance of these late submissions for consideration by the Hearings Panel. Submission 085 was subsequently withdrawn.

Two submissions were received by partners in the Greater Christchurch Partnership: Christchurch City Council (CCC) and the Canterbury District Health Board (CDHB). Procedural legal advice in relation to the preparation of this Officers' Report and the consideration of these submissions by the Hearings Panel is included in Appendix D.

During the preparation of this Officers' Report, CCC and CDHB staff have therefore not been involved in dealing with matters raised in their respective submissions. 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 respective organisation's submission.

A quantitative analysis of the submissions is included as Appendix E.

A review of the submissions by officers identified a number of key submission themes. Officers' comments and recommendations in relation to these themes are included in Section 4 of this Officers' Report. Officers' comments and recommendations in relation to other matters raised by individual submitters are included in Section 6.

Officers' comments and recommendations outlined in this report are based on the content of the submissions, not having heard from submitters wishing to be heard as part of the upcoming Hearings Panel process. Officers would welcome the opportunity to provide updated recommendations after hearing from submitters and considering any additional information provided by submitters as part of the hearings.

## 4. Submission themes and officers' recommendations

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A number of key themes were raised by submitters in relation to *Our Space*, albeit often with a variance of views in relation to each theme (see the table at the end of this section for an overview of themes raised by each submitter). Officers' comments and recommendations on these themes, particularly those challenging the rationale and appropriateness of the proposals in *Our Space*, are outlined in this section.

The key submission themes include:

1. Accuracy and uncertainties of projected demands
2. Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts
3. Protecting productive/agricultural/high quality soils from urban expansion
4. Need for further greenfield areas (including specific sites proposed in each district)
5. Sequencing and staging of greenfield land
6. Transport needs and implications, including public transport
7. Poor intensification outcomes and preferences to focus intensification in the central city
8. Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'
9. Provision of social and affordable housing and a range of housing types
10. Provision and protection of key infrastructure and integration with development
11. Addressing climate change and achieving sustainability and zero carbon goals

Where constituent partner staff hold different views on the officers' recommendations outlined in this section, a range of options are set out for consideration of the Hearings Panel. Further assessment of these options is provided in Appendix F, including the advantages and disadvantages of each option, and any differing views of partner staff members involved in the development of *Our Space* in terms of a preferred approach. The authors of this report have also provided a final recommendation to the Hearings Panel taking into account all available information.

### 1. Accuracy and uncertainties of projected future demand

*Submitters questioned the ability to accurately determine projected demand, particularly over a thirty year period, and 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.*

*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.*

*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. 9).

It is of note that in developing the UDS 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.

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.

As one would expect, population projections represent the single greatest variable to determining demand for housing, and through the impacts of a larger population on the economy, the growth of the labour force and the related demand for business land and floorspace.

However, in some respects, 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 UDS 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.

#### **Officers' recommendation:**

**Officers accept 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. 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.**

**For the purpose of a final *Our Space* document, officers' do not recommend any change to the adopted projections and targets set out in Section 3 of *Our Space*.**

## **2. Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts**

*Submitters considered that the proposals in Our Space encourage urban sprawl, and will contribute to such issues as increased car dependence and emissions, downstream traffic effects, loss of versatile soils and the inefficient provision of infrastructure.*

*Submitters stated that development should first be directed to the existing development capacity in the City before considering the release of any additional greenfield land, with a number of submitters noting this to be necessary to ensure the successful recovery, regeneration and viability of the Central City.*

*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 UDS. 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%).

As shown in Figure 12 (p. 20) of *Our Space*, the remaining development capacity (19%) identified to meet long term demand is proposed in new greenfield and redevelopment areas in Selwyn and Waimakariri. This includes new future development areas in Rolleston, Rangiora and Kaiapoi that will help address projected capacity shortfalls in the districts. These greenfield areas are consistent with identified 'urban limits' in the UDS and Proposed Change 1 to the CRPS to support growth through to 2041. Chapter 6 of the CRPS only provides for growth to 2028 due to the timeframes of the recovery legislation that inserted this chapter. Additional greenfield areas identified in Proposed Change 1 through to 2041 were not included as greenfield

priority areas, but were still included within a Projected Infrastructure Boundary (PIB) in Map A of the CRPS, and have been subject to spatial planning exercises by Selwyn and Waimakariri District Councils as part of considering future development within the PIB.

As discussed above, the Greater Christchurch population is projected to be 640,000 in 2048. However, *Our Space* proposes that this growth is managed within an area that was originally seeking to support a population of 550,000. This is possible due to the extensive up-zoning through the Christchurch District Plan Review that enabled additional development capacity across the City. The District Plan Reviews for Selwyn and Waimakariri will also investigate options for redevelopment and intensification in their larger towns to increase development capacity within existing urban areas. This action is included in the schedule of future work in Section 6.2 of *Our Space*.

The redevelopment and intensification of existing urban areas, along with any increase in housing densities in the future development areas, will clearly reduce the extent of the urban expansion required to support projected demand through to 2048. A more consolidated urban form in Greater Christchurch will support efficient integration of land use and infrastructure, and help achieve a range of outcomes envisaged by the UDS and CRPS.

*Our Space* signals that suitable housing density requirements for the proposed future development areas in Rolleston, Rangiora and Kaiapoi will be a consideration of the District Plan Reviews underway in Selwyn and Waimakariri, which are due to be publicly notified in 2020. This is included in the schedule of future work in Section 6.2 of *Our Space*. A final *Our Space* document could provide stronger direction for achieving higher densities in greenfield areas, with a change to the CRPS requiring these future development areas and other existing greenfield areas to be subject to higher density requirements.

The history of Christchurch City and the key towns in Greater Christchurch has involved a gradual uptake of greenfield areas to meet market demand for standalone, single storey dwellings. While there is still strong demand for this type of housing 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.

*Our Space* therefore 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.

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. While it is noted that research by JLL<sup>4</sup> indicates that the Central City competes on price with housing in Selwyn and Waimakariri, it also states that the Central City competes more directly with housing in the City's inner suburbs. This makes it hard to justify only imposing constraints on the districts to limit competition for the Central City, especially as the markets are unlikely to directly compete for the same end-users.

Officers consider *Our Space* provides a balanced approach to providing for long term growth and that the additional land identified in Figure 15 (p. 24) of *Our Space* for future development does not represent an inappropriate urban expansion of Rolleston, Rangiora and Kaiapoi. These future development areas have been identified in previous planning processes, including Proposed Change 1 to the CRPS, district development strategies, and councils LTPs and infrastructure strategies. Greenfield areas included in Map A of the CRPS are already part of the existing planning framework, and have been substantially advanced through subdivision and development.

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<sup>4</sup> [https://www.propertynz.co.nz/sites/default/files/uploaded-content/website-content/EventHeaderImages/christchurch\\_central\\_residential\\_research.pdf](https://www.propertynz.co.nz/sites/default/files/uploaded-content/website-content/EventHeaderImages/christchurch_central_residential_research.pdf)

One way to reduce the extent of urban (greenfield) expansion required to meet projected household growth to 2048 is to promote appropriate higher densities within greenfield areas. Given development of existing greenfield priority areas in Map A has significantly progressed, the option to increase greenfield densities is best suited to the proposed future development areas in Selwyn and Waimakariri.

Having regard to the matters raised in submissions, officers have identified four options for considering the appropriateness of higher densities in future development areas, for consideration by the Panel.

- i. Greater direction and certainty included in a final *Our Space* document, and/or
- ii. Greater direction and certainty included through changes to Chapter 6 of the CRPS, and/or
- iii. Greater direction and certainty provided as part of District Plan Reviews, and/or
- iv. Comprehensively review density provisions as part of a full review of the CRPS in 2022.

An assessment of the merits of these options, as well as any differing views of partner staff in terms of a preferred approach, are included in Appendix F.

**Officers' recommendation:**

**Officers do not recommend that *Our Space* specifies any change to the minimum densities to be achieved in future development areas as there is not currently a sufficiently robust evidence base to determine if higher minimum densities are appropriate.**

**Officers recommend including additional wording in Section 5.3 of *Our Space* that partners will undertake an evaluation of minimum densities across Greater Christchurch that would help inform a decision as to the appropriateness of including revised minimum densities within the scope of a proposed change to the CRPS in 2019.**

**Officers recommend including an additional action in Section 6 of *Our Space* signalling a commitment to undertake an evaluation of minimum densities in 2019.**

### 3. Protecting productive, agricultural and high quality soils from urban expansion

*Submitters highlighted the value of productive rural land with high quality soils that are located adjacent to or nearby existing urban areas, and were opposed to any further losses of such land to urban uses.*

Figure 10 (p. 17) of *Our Space* identifies a number of environmental constraints in Greater Christchurch that influence decisions on where urban development should locate. This includes constraints related to natural hazards, groundwater protection zones, outstanding natural landscapes and versatile soils.

As highlighted above, the greenfield areas shown in Map A of the CRPS have already been zoned for urban use, while the future development areas proposed in *Our Space* in Rolleston, Rangiora and Kaiapoi align to the 'urban limits' from the UDS and Proposed Change 1 to the CRPS, as shown by the PIB in Map A of the CRPS. These areas have also been subject to spatial planning by Selwyn and Waimakariri District Councils as part of considering future development within the PIB.

In this context, the appropriateness of these greenfield areas for future development has been extensively considered as part of previous planning processes. While parts of the future development areas are shown as comprising versatile soils, the development of these areas are not considered to represent a significant encroachment on the vast majority of high quality, productive land in Greater Christchurch.

Following its release, it will also be necessary for reviews of the CRPS and district plans to consider the implications of a new National Policy Statement on Versatile Soils.

### **Officers' recommendation:**

**Officers do not recommend any changes are made to *Our Space* in relation to this theme. Officers accept that parts of the proposed future development areas in Selwyn and Waimakariri comprise versatile soils, but consider these areas appropriate for development to demonstrate sufficient, feasible development capacity and provide for the consolidated urban form and function of the respective towns. Further investigation and evidence to support such an approach would need to be provided as part of any change to the CRPS and relevant district plans.**

#### **4. Need for further greenfield areas, including specific sites proposed in each district**

*Submitters considered there was a general need for additional greenfield land in certain locations, and while not always providing a view on the sufficiency of development capacity identified in Our Space, a number of submitters proposed specific additional greenfield land to be considered for development.*

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 UDS. 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 for Selwyn and Waimakariri, that are consistent with the UDS, district development strategies (*Selwyn 2031* and *Our District, Our Future* for Waimakariri) and LTPs.

As discussed above, any increase in housing densities in the proposed future development areas, along with the redevelopment of existing urban areas, will increase the development capacity available in Selwyn and Waimakariri to meet long term housing demand. While the assumption of *Our Space* is that the identified development capacity will be sufficient to provide for long term demand in the two districts, this would be determined as part of subsequent RMA planning processes that will examine the appropriate housing yields of future development areas and any redevelopment opportunities. Until such time as this work has been completed, it is considered that the proposals in *Our Space* will be sufficient to meet long term demand.

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 UDS and CRPS that seek to promote a consolidated urban form in Greater Christchurch, and that it aligns with the infrastructure servicing arrangements outlined in LTPs and infrastructure strategies.

In this context, *Our Space* has been prepared under the provisions of the LGA. Any rezoning of land to urban uses would need to be enabled through changes to the CRPS and relevant district plans under the RMA. A final *Our Space* document would provide some direction to inform such processes as part of RMA provisions giving regard to the strategies prepared under other Acts (Sections 66(2)(c)(i) and 74(2)(b)(i) respectively). Landowners submitting additional land for consideration would have an opportunity to outline the merits of such land at the time these RMA changes were considered.

It is noted that some submissions identify land where the PIB shown in Map A of the CRPS does not follow a cadastral boundary, instead segmenting a land parcel. Officers acknowledge that in some circumstances minor improvements could be made to Map A to address these issues.

Other submissions relate to land in Christchurch City that was previously considered as part of the Replacement District Plan hearings. At the time, the Independent Hearings Panel considered the merits of these areas and made decisions that supported some proposals to rezone land around the edges of the City's urban area, but were constrained by the policies in Chapter 6 of the CRPS.

Other submissions highlight land located adjacent to and impacted by the Christchurch Southern Motorway (CSM and CSM2), and seek an urban use for this land that might provide a logical or contiguous extension to the existing urban area over time. Aside from the 'need' issue, many of these areas require further analysis,

including consideration of the broader context and landowner consultation to inform consideration of any future land use changes.

Land identified by submitters in these three circumstances is not considered necessary to demonstrate sufficient, feasible development capacity for Greater Christchurch for the period to 2048. However, it may be appropriate to address such matters through future changes to the CRPS and district plans. In the majority of these cases the appropriate process to consider areas for future development identified by submitters, along with any wider policy changes to Chapter 6, is likely to be the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 of *Our Space*.

#### **Officers' recommendation:**

**Officers do not consider that the 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. This land is best considered as part of subsequent RMA planning processes, including changes to the CRPS and district plans, and relevant LGA process, including spatial planning.**

## 5. Sequencing and staging of greenfield land

*Submitters considered that Our Space does not fully sequence development as required by the NPS-UDC to ensure the efficient use of infrastructure, or stated views in relation to the staging of future urban areas in relation to existing greenfield areas.*

The NPS-UDC requires that a future development strategy identifies the sequencing of future development capacity. This is particularly important to ensure that land use decisions are integrated with the provision of significant new infrastructure to service such capacity.

Greater Christchurch is relatively well-placed in relation to major infrastructure investment, particularly over the medium term. The completion of major state highway transport upgrades over the next three years will maintain the relatively high accessibility levels experienced in comparison to other major urban centres. Trunk wastewater infrastructure and treatment facilities established or upgraded over the last decade can also accommodate projected growth through stepped investment to increase capacity.

In the longer term there is the potential that growth could undermine transport investments and cause increasing levels of congestion at the main north and south-west entry points to the City, particularly if current commuting patterns and mode shares remain, hence the ambitious public transport investment signalled in the RPTP and outlined in Section 5.6 of *Our Space*.

As outlined above in response to submitters seeking additional land, *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.

*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.

To meet the housing targets for the medium term, Waimakariri (and potentially Selwyn, should updated feasibility and sufficiency figures be adopted as part of a final *Our Space* document) may need to identify and advance through zoning some parts of the identified future development areas for Rangiora and Kaiapoi (and potentially Rolleston). The extent of land to be identified will be influenced by related matters covered elsewhere in this report, such as the appropriate minimum densities and any further interventions to enable redevelopment of existing urban areas in these towns. Once zoned, unless there are significant infrastructure

servicing constraints, the sequencing of land will largely be dependent on housing market conditions and the aspirations of local landowners and developers.

Following the completion of detailed structure planning, the balance of land comprising the future development areas not needed to meet medium term housing targets would be sequenced, if required, for meeting long term housing targets. Resolving submissions seeking that future development urban areas are only advanced following development of existing greenfield priority areas, or submissions seeking that future development areas are fast-tracked to enable development to proceed at the earliest opportunity, are premature and are best considered as part of the detailed structure planning work signalled in *Our Space*.

Having regard to the matters raised in submissions, officers have identified three options for consideration by the Panel with regard to sequencing (i.e. scale, timing and location of development):

- i. Retain the approach as outlined in *Our Space*
- ii. Provide additional direction in a final *Our Space* document (without the benefit of detailed structure planning and/or outline development plans of proposed future development areas), and/or,
- iii. 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).

An assessment of the merits of these options, as well as any differing views of partner staff in terms of a preferred approach, are included in Appendix F.

#### **Officers' recommendation:**

**Officers recommend including amended wording in *Our Space* (Section 3.2 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 additional development capacity required over the long term only needs to be identified. This provides greater planning certainty than the current wording in *Our Space* and ensures efficient infrastructure planning and delivery across Greater Christchurch.**

**Include wording in *Our Space* (Section 5.5 p. 26 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.**

**Include wording in *Our Space* (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 (including consideration of provisions to clarify the anticipated proportional quantum for Rangiora and Kaiapoi in Waimakariri).**

**Officers do not recommend that *Our Space* determines the sequencing priority between future development areas and existing undeveloped greenfield areas or identifies those parts of future development areas necessary to meet medium term housing targets. This is best considered as part of detailed structure planning and infrastructure servicing to be undertaken by relevant territorial authorities.**

## 6. Transport needs and implications, including public and active transport

*Submitters highlighted the need for greater investment in public transport, supporting the rapid transit proposals, and encouraging more active transport modes, such as walking and cycling. Some of these submitters considered that any future urban sprawl would have an adverse effect on the transport network and the outcomes sought by Our Space.*

Section 5.6 of *Our Space* highlights the importance of land use and transport integration and reflects the recent changes to transport planning and investment provided through the Government Policy Statement on Land Transport (GPS), and more locally through the updated Regional Land Transport Plan (RLTP) and Regional Public Transport Plan (RPTP). Appendix C of this Officers' Report summarises community feedback received as part of the recent RPTP public consultation. Of particular importance is the ambitious vision outlined in the RPTP to fully integrate the public transport system with the wider transport system and urban form, thereby increasing mobility and accessibility across Greater Christchurch.

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. 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. 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 RLTP and RPTP 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. Periodic reviews of this future development strategy will need to consider how these plans provide sufficient direction and detailed implementation programme to give effect to this vision.

### **Officers' recommendation:**

**Officers do not recommend any changes are made to *Our Space* in relation to this theme. Officers consider the vision, strategic direction and work underway to implement the intent of recently updated transport plans, such as the RLTP and RPTP, 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.**

## 7. Poor intensification outcomes and preferences to focus intensification in the Central City

*Submitters expressed concerns regarding poorly managed intensification and some submitters considered intensification as being more appropriate for the Central City than suburban Christchurch.*

*Our Space* supports the existing UDS approach of encouraging greater levels of redevelopment to increase urban densities in existing neighbourhoods, particularly in proximity to Key Activity Centres. As outlined above, this accounts for 45% of the identified development capacity necessary to meet projected demand in Greater Christchurch, including the growing demand for smaller, more affordable homes that are well-connected to jobs, shops and services, and facilities.

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).

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.

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.

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.

#### **Officers' recommendation:**

**Officers do not recommend any changes are made to *Our Space* in relation to this theme. Officers consider that a city-wide approach to intensification remains appropriate and that this aligns with the provisions in the Christchurch District Plan, and the directions from the UDS and CRPS. Improving intensification outcomes is a priority of Christchurch City Council and resolving matters relating to build quality, neighbourhood amenity and better opportunities for community engagement in development processes are best addressed at a territorial authority level. *Our Space* will need to monitor and review the implementation of this approach as part of subsequent capacity assessments.**

## **8. Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'**

*Submitters commented on the centres-based approach outlined in Our Space, and how this relates to commercial activity and access to local facilities.*

*Our Space* reflects the current CRPS 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.

Figure 19 (p. 30) of *Our Space* encapsulates this approach through use of a '10 minute neighbourhood' conceptual diagram. This was a significant topic of discussion in the stakeholder review workshop described in Section 3.2 and documented in Appendix B. Feedback was that Figure 19 was not sufficiently linked to the wording in Section 5 outlining the centres-based approach and the role of Key Activity Centres.

The majority of submissions supported the prevailing centres-based approach to providing for commercial activities in Greater Christchurch, although a few submitters sought greater provision to be made for 'out-of-centre' commercial activities. The Christchurch District Plan gave effect to the centres-based approach through its District Plan Review. However, the District Plan also makes provision for new commercial activity outside of centres on a more limited basis, where this best meets the needs of residential communities and

doesn't adversely affect the existing network of centres. This includes provision for home-based occupation and smaller-scale convenience activities in residential zones. Most communities have good access to one or more of the more than one hundred commercially zoned centres in Greater Christchurch.

**Officers' recommendation:**

**Officers consider the centres-based approach that is part of the existing planning framework and that guides the location of commercial growth and other public and community facilities remains appropriate.**

**Officers acknowledge that the explanation of, and policy intent behind, Key Activity Centres is limited in *Our Space*, and recommend the connection with the 10-minute neighbourhood concept should be clarified in *Our Space* through additional wording in Section 5.**

## 9. Provision of social and affordable housing and a range of housing types

*Submitters supported the delivery of a range of housing types to meet demand, including the proposed development of a social and affordable housing action plan, but some submitters questioned the ability to deliver a diversity of housing under the current planning framework, the evidence base regarding changing household needs and the role of councils and developers in enabling social and affordable housing.*

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. This analysis was completed by expert consultants and is fully outlined in the Capacity Assessment.

*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.

Section 5 of *Our Space* also proposes to develop an action plan and partnerships to enable social and affordable housing across Greater Christchurch. Such an action plan would investigate appropriate mechanisms to develop and finance an increase in the provision of social and affordable housing, acknowledging that the extent to which councils are involved in the delivery and operation of such housing will vary. 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, new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers.

**Officers' recommendation:**

**Officers do not recommend any changes are made to *Our Space* in relation to this theme. Officers consider 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.**

**Officers consider a social and affordable housing action plan is well supported and should be retained in the schedule of future work identified in Section 6 of *Our Space*. Development of such a plan should have regard to the matters raised through submissions.**

## 10. Provision and protection of key infrastructure and integration with development

*Submitters considered some infrastructure matters needed greater attention within Our Space, including freight networks, port and airport operations, and implications for educational facilities.*

Section 5.6 of *Our Space* briefly discusses the importance of freight hubs and networks in Greater Christchurch, recognising that the City is a key freight hub for the South Island with two inland ports acting as gateways. Figure 18 of *Our Space* (p. 29) identifies the strategically important gateways (including the Port of Lyttelton and Christchurch International Airport) and freight hubs.

*Our Space* acknowledges that an important part of managing the transport network is to ensure that freight can be moved efficiently to and through Greater Christchurch, and that this requires effective management of congestion on the main freight routes. The principal focus of *Our Space* in this regard is how to improve integrated land use and transport planning, thereby enabling more people to reside in areas accessible to a mix of transport modes and reduce the reliance on private vehicles. This has associated congestion, safety, access, environmental and cost benefits, including for freight operators.

Reflecting their importance to the South Island economy, a key focus of the RLTP is investing in freight routes, while other key projects and programmes, such as work on Brougham Street and Public Transport Futures, will also have positive impacts on the operation and efficiencies of freight routes in Greater Christchurch.

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 CRPS and district plans. Given the proposals in *Our Space* do not deviate from the long term 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. This includes incorporating the airport noise contours as a constraint on development in Figure 10 of *Our Space* (p. 17).

Section 5.6 of *Our Space* also notes that extensive strategic planning work undertaken by partner councils over the last decade to identify future locations for housing and business growth has enabled them to plan for and invest in the infrastructure needed to support development. This includes provision of social and community facilities, such as schools, healthcare and community halls. Given the Capacity Assessment indicates that, for the most part, there is sufficient infrastructure network capacity to support the projected growth across Greater Christchurch, this issue was only briefly referenced in *Our Space*.

### **Officers' recommendation:**

**Officers accept that the growth associated with the proposals in *Our Space* will need to be appropriately managed to avoid significant adverse effects on key infrastructure. This is considered to already be substantially addressed through the existing planning framework, including the CRPS and district plans, such that further provisions or changes are not required to be outlined in *Our Space*. Some minor changes are recommended in Section 5 of this report that relate to individual points included in Section 6.**

**Officers note 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. Transport infrastructure planning will also need to be closely monitored to ensure alignment with future growth.**

## 11. Addressing climate change and achieving sustainability and zero carbon goals

*Submitters 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.*

The proposed planning directions in *Our Space* are guided by the vision, principles and strategic goals in the UDS, especially in terms of the ‘integrated and managed urban development’ theme. A key strategic goal of this theme is that we understand and plan for risks from natural and other hazards, including those related to sea level rise and climate change. UDS approaches to address broader sustainability objectives could be referenced through additional wording in Section 4 and 5 of *Our Space*.

*Our Space* also seeks to align with the cultural values and aspirations of Ngai Tahu whānui for the Greater Christchurch area. This includes the holistic concept known as Ki Uta Ki Tai (from the mountains to the sea), which is central to the role and responsibilities of kaitiakitanga, and recognises the interconnected nature of the Greater Christchurch environment.

One of the principal tenets of a more sustainable urban form is achieving integrated land use and transport planning, meaning more people can live in areas that have good access to a wide range of transport modes, and are therefore less dependent on private vehicles. *Our Space* seeks to achieve this goal by consolidating development in and around Christchurch City, and the larger towns in Selwyn and Waimakariri, and aligning with the proposals of separate transport plans, especially those in the RPTP.

Growing the share of trips made by public and active transport will go a long way to achieving sustainability and zero carbon goals for Greater Christchurch. How to improve integrated land use and transport planning was therefore a key deliberation when deciding how future urban development should be accommodated across Greater Christchurch.

Future technological changes and innovations, including the increasing adoption of electric vehicles, are also expected to play a significant future role in reducing the environmental impacts and contributing towards the achievement of sustainability goals.

**Officers’ recommendation:**

**Officers consider 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.**

**Officers acknowledge that the coverage of climate change and sustainability and the implications of urban growth on these matters is limited in *Our Space*, and recommends that additional wording is included in Sections 4 and 5 to highlight these issues.**

## Summary of submitters by theme

Submitter	1	2	3	4	5	6	7	8	9	10	11
001 Lloyd Bathurst	X			X							
002 Floyd Rudolph						X					
003 Scott Boyce					X						
004 John Dryden							X				
005 Drucilla Kingi-Patterson			X			X			X		
006 Robert and Margaret Spark, and Richard and Dawn Spark, Spark Bros Ltd				X							
007 Peter Wells		X	X			X		X	X	X	X
008 John Ascroft						X					
009 Bellgrove Family Trust	X			X	X						
010 David Hawke		X		X		X		X	X		
011 Randal Inch	X			X	X						
012 Pat McIntosh	X	X	X			X			X		X
013 Andrew Long		X				X		X	X		X
014 Michael Steadman			X		X	X					X
015 Cashmere Park Trust				X				X	X	X	
016 Te Waipounamu Community Housing Network									X		
017 Steve Holland						X			X		
018 Suzanne Vallance			X				X	X	X		X
019 Gillman Wheelans	X			X				X	X	X	
020 Dalkeith Holdings Ltd	X			X	X						
021 Lionel Green				X							
022 Sharon Jones				X	X						
023 Ivan Robertson, Lindsay and Judith Blackmore, and Malcolm Main				X	X						
024 CF Holdings Ltd - South Rolleston				X	X						
025 Barry Gallagher and David Tipple				X							
026 Ellis Darussette Ltd				X	X						
027 Victoria Foxton				X		X		X	X		
028 M. Springer				X							
029 Inovo Projects	X	X		X				X	X		
030 Oderings Nurseries Ltd				X		X		X	X	X	
031 Car Distribution Group Ltd											
032 Infinity Investment Group Holdings Ltd	X			X							
033 Majority Beneficiaries of the Bellgrove Family Trust; Gary Inch, Devin Inch, Sharlene Inch and Courtney Inch				X							
034 Geoff Marks									X		
035 RJ Civil Construction				X							
036 Lawrence and Cherry McCallum		X				X	X		X		
037 Sustainable Otautahi Christchurch											X
038 Cathedral City Development Ltd	X			X							
039 Christchurch International Airport (Felicity Blackmore)				X		X	X			X	
040 Ben and Sally Tothill				X							
041 Spokes Canterbury		X	X				X	X			X
042 One Voice Te Reo Kotahi (OVTRK) Organising Group											
043 Red Spur Ltd	X			X							
044 Simon Britten						X			X		
045 Tony Dale	X	X	X				X	X	X		

Submitter	1	2	3	4	5	6	7	8	9	10	11
046 Don Babe	X	X				X					
047 Foddercube Products Ltd	X			X							
048 Olly Powell		X									
049 Transpower New Zealand Ltd											
050 Grant Poultney				X							
051 Suburban Estates Ltd, Sovereign Palms Ltd and Doncaster Developments Ltd		X		X	X						
052 Woolworths New Zealand Ltd				X							
053 Cockburn Family Trust				X							
054 Grassmere Residents		X	X						X		
055 Hughes Developments Ltd											
056 Graeme Alan and Joy Yvonne Mc Vicar	X			X							
057 B. Welsh, S. McArthur, T. Kain				X							
058 Canterbury District Health Board						X		X			X
059 Ernst Frei	X			X							
060 GFR Rhodes Estate & Larson Group	X			X							
061 Martin Pinkam									X		
062 Townsend Fields Ltd					X						
063 Carolina Homes Ltd					X						
064 Riccarton Bush Kilmarnock Residents Association	X					X	X		X		
065 Scarborough Hill Properties Ltd, and Directors/Shareholders Ruth Kendall & Ewan Carr				X							
066 AgResearch				X							
067 Lyttelton Port Company						X				X	
068 Central City Business Association		X				X					
069 Lincoln Developments Ltd	X			X							
070 Brendon Harre		X				X			X		
071 Allan Downs Ltd					X						
072 Kevin and Bonnie Williams				X							
073 Rolleston Industrial Holdings Ltd											
074 Christchurch City Council	X	X			X				X		
075 Ministry of Education								X			
076 Carter Group Ltd				X							
077 ChristchurchNZ and Development Christchurch Ltd	X	X									
078 Lincoln University				X							
079 KiwiRail Holdings Ltd										X	
080 Robert Fleming		X	X			X					
081 Malc Dartnall									X		
082 Helen Broughton	X								X		
083 Youth Voice Canterbury											
084 Richard Graham		X						X			
085 Pomeroy's Round Table											
086 Kieran Williamson		X				X	X	X			X
087 Axel Wilke						X					
088 Colin Eaton			X			X				X	
089 Chris Morahan		X				X	X	X			
090 Wayne Phillips	X	X				X			X		
091 Landowners ODP 12 Rolleston											
092 John Law				X							

## 5. Proposed *Our Space* changes arising from Officers' recommendations

This section provides a consolidated view of proposed changes to *Our Space* as recommended by officers. These changes are based on above officers' recommendations with regard to identified themes in Section 4 and further officers' recommendations from detailed submission points in Section 6.

Officers' recommendations are not informed by additional material and hearings. Officers would therefore welcome an opportunity to provide any updated advice ahead of Panel deliberations.

Section 2 – Our Place	Response to
Amended wording for Section 2.1, paragraph 7, p.3: Employment levels in the Central City <u>continue to increase but are not yet back to levels that existed prior to the earthquakes.</u>	<i>Submission 77</i>
Section 3 – Our Growth Needs	
Amended wording for Section 3.2, paragraph 5, p.12: <i>In this context, the targets set out in Table 2 for Christchurch City, Selwyn and Waimakariri represent the development capacity that each council will, <u>over the medium term, zone and otherwise</u> enable through their relevant planning processes and mechanisms (district plans, structure plans, outline development plans and infrastructure strategies) to meet the demand for housing in Greater Christchurch. <u>Unless already enabled, additional development capacity required over the long term will only be identified in relevant plans and strategies, and the development infrastructure required to service it will be identified in each council's infrastructure strategy.</u></i>	<i>Section 4 theme 5</i>
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. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	<i>Submission 74</i>
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. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	<i>Submission 74</i>
Amended numbers for Section 3.2, Table 3, p.13 as shown in Appendix F of this report.	<i>Submission 74</i>
Amended graphic for Section 3.3, Figure 9, p.14 to reflect changes based on updated projected employment resulting from the transitional approach to housing targets in <i>Our Space</i> . (Proposed graphic will be provided as part of the presentation of this report to the Hearings Panel)	<i>Submission 74</i>
Amended figures for Section 3.3, Table 4, p.14 to reflect changes based on updated projected employment resulting from the transitional approach to housing targets in <i>Our Space</i> . (Proposed graphic will be provided as part of the presentation of this report to the Hearings Panel)	<i>Submission 74</i>

<b>Section 4 – Our Growth Challenges</b>	
Amended wording to Section 4.1 to reference Figure 10 and to clarify the purpose and scope of the maps shown in this section. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	Submission 1, 13, 39
Amended Natural Hazards map for Section 4, p.17 to more accurately show high flood hazard areas. (Proposed graphic will be provided as part of the presentation of this report to the Hearings Panel)	Submission 39
Amended wording to Section 4 to provide better coverage of climate change and sustainability matters, including the implications of urban growth. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	Section 4 theme 11
<b>Section 5 – Our Plan</b>	
Amended wording for Section 5.3, new fourth paragraph, p24: <i><u>To most efficiently utilise land within identified future development areas, consideration will also be given to appropriate residential densities. An evaluation of current minimum greenfield densities, to be undertaken in 2019, will help inform a decision as to the appropriateness of including revised minimum densities within the scope of a proposed change to the CRPS.</u></i>	Section 4 theme 2
Amend Figures 15 and 16 in Section 5.3 to show the submitter's land (as shown in the submission) as being outside the Special Housing Area	Submitter 26
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. <i><u>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.</u></i>	Section 4 theme 5
Amended wording for Section 5.5, paragraph 3, p26: <i><u>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.</u></i>	Section 4 theme 5
Amended wording for Section 5.6, p27 to provide greater explanation of freight hubs/networks and strategic infrastructure, with potential identification in Figure 18 (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	Submission 39, 67
Amended wording in Section 5.7 to clarify the reference to Map A. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	Submission 15
Amended wording to Section 5 to provide a better explanation of Key Activity Centres and the connection with the 10-minute neighbourhood concept shown in	Section 4 theme 8

Figure 19. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	
Amended wording to Section 5 to provide better coverage of climate change and sustainability matters, including the implications of urban growth. (Proposed wording will be provided as part of the presentation of this report to the Hearings Panel)	Section 4 theme 11
<b>Section 6 – Our Next Steps</b>	
New action wording for Section 6, Schedule of future work, 'Improve our tools and evidence base': <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. Lead partners: SDC, WDC, CCC, ECan. Timeframe: 2019.</u>	Section 4 theme 2
Amended wording for Section 6 Action 8, new bullet point: <ul style="list-style-type: none"> <li><u>consider the appropriateness of including revised minimum densities for future development areas</u></li> </ul>	Section 4 theme 2
Amended wording for Section 6, Action 8, p34: Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to: <ul style="list-style-type: none"> <li><u>identify areas for future growth over the long term</u></li> <li><u>ensure the quantum of additional development capacity sequenced by territorial authorities for each town is in accordance with meeting the medium term housing targets</u></li> <li><u>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</u></li> </ul>	Section 4 theme 5
Amended wording for Section 6, Action 9, p34: Undertake detailed planning work <u>(in accordance with directions outlined in CRPS Chapter 6 and the proposed change identified in Action 8)</u> for the relevant Greater Christchurch towns in Selwyn and Waimakariri, including:	Section 4 theme 5
Add a reference to third sector organisations in the second para of Section 6.3 beginning "Although the implementation...".	Submitter 42
<b>General refinements and consequential changes to Our Space</b>	
Replace 'Have your Say' page content with 'Message from the Partners' and 'Mihi'	

## 6. Officers’ recommendations on individual submissions

This section provides officers’ comments and recommendations for each of the 92 individual submissions.

Submission points summarised in this section are provided to assist an understanding of the officers’ recommendations. However, reference to the full submission is recommended to avoid the potential for misinterpretation. Officers’ comments and recommendations outlined below should be read in conjunction with those outlined in Section 4 and 5 in relation to key submission themes, where relevant.

### **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.	
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comments and recommendations outlined in Section 4 in relation to themes 1 ( <i>Accuracy and uncertainties of projected demands</i> ) and 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Notes that liquefaction and earthquake risk factors are not shown on the Natural Hazards map (Figure 10, p.17).	
<b>Officers’ comment:</b> This map identifies natural hazards that significantly influence decisions on where new urban development should locate. Liquefaction and earthquake risk factors should be appropriately managed as part of the development process, but are not considered to significantly influence decisions and therefore have not been included in the map. Officers acknowledge that the purpose and scope of this map, as well as other constraints maps in Figure 10, could be clarified in Our Space.	<b>Officers’ recommendation:</b> Amend Section 4.1 to clarify the purpose and scope of the constraints maps.

### **Floyd Rudolph (002)**

Promotes industrial hemp farming, particularly for Christchurch red zone areas, and community blockchain.	
<b>Officers’ comment:</b> Such matters are out of scope for Our Space. The role of Our Space is to ensure there is sufficient land available to accommodate a range of business activities, but doesn’t seek to determine the specific activities. The consideration of future land uses in Christchurch red zones is also the subject of a separate planning process.	<b>Officers’ recommendation:</b> No change to Our Space.
Supports bus lanes, and subsidised e-bikes, scooters and longboards that can go on buses for last kilometre travel.	
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ). The operation of the public transport network is the responsibility of Environment Canterbury through other processes and mechanisms, and is therefore out of scope for Our Space.	

### **Scott Boyce (003)**

Unsure of the information available for the timing of the future development areas in Selwyn.	
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Sequencing and staging of greenfield land</i> ).	

**John Dryden (004)**

Queries why there is no discussion of the cultural aspirations of the majority of people who live in Christchurch.	
<b>Officers' comment:</b> Our Space is guided by the vision, principles and strategic goals of the UDS, which were developed after extensive consultation and represent the collective aspirations and preferences of people in Greater Christchurch. Section 2.3 (p. 4) 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.	<b>Officers' recommendation:</b> No change to Our Space.
Considers that the intensification of residential areas will fail unless good urban design principles are enforced.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the Central City</i> ).	

**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.	
<b>Officers' comment:</b> Such matters are out of scope for Our Space. 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 strategic directions of the UDS. The NPS-UDC does not require local authorities to consider the implications of major events on the approach to urban development.	<b>Officers' recommendation:</b> No change to Our Space.
Concerned that new development will affect civil defence zones and food producing farmland.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 3 ( <i>Protecting productive, agricultural and high quality soils from urban expansion</i> ). The proposals in Our Space will not affect evacuation zones in Greater Christchurch. Specific civil defence matters are the responsibility of the Canterbury Civil Defence Emergency Management Group and are therefore out of scope for Our Space.	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ).	
Notes the need for light rail between Amberley and Ashburton, and Lincoln and the Central City.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ). The option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.	

**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.
<b>Officers' comment and recommendation:</b>

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*).

**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.

**Officers' comment and recommendation:**

Refer to the officers' 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*).

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

**Officers' comment and recommendation:**

Refer to the officers' 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*).

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

**Officers' comment and recommendation:**

Refer to the officers' 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'*).

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

**Officers' comment and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 (*Transport needs and implications, including for public and active transport*).

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

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.

**Officers' comment and recommendation:**

Refer to the officers' comments and 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*).

Whilst 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.

**John Ascroft (008)**

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

**Officers' comment and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 (*Transport needs and implications, including for public and active transport*).

**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.

<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Sequencing and staging of greenfield land</i>).</p>
<p>Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p>

**David Hawke (010)**

<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>).</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>) and 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>
<p>Notes the need for mixed developments that provide a range of social, affordable and market housing types.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 6 (<i>Transport needs and implications, including for public and active transport</i>) and 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p> <p>The Capacity Assessment identified a significant over-supply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 (p. 14) of Our Space outlines these findings.</p>

**Randal Inch (011)**

<p>Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>

<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Sequencing and staging of greenfield land</i>).</p>
<p>Considers that a high growth projection scenario would be more appropriate for Waimakariri given recent trends.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p>

**Pat McIntosh (012)**

<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>), 3 (<i>Protecting productive, agricultural and high quality soils from urban expansion</i>), 6 (<i>Transport needs and implications, including for public and active transport</i>) and 11 (<i>Addressing climate change, and achieving sustainability and zero carbon goals</i>).</p> <p>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 UDS. Section 2.3 (p. 4) 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.</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p> <p>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. The approach to setting housing targets in Our Space, as outlined in Section 3.2 (p. 13), is also considered to represent a principles-based approach rather than following a purely projections-led approach.</p>

**Andrew Long (013)**

<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>), 6 (<i>Transport needs and implications, including for public and active transport</i>) and 11 (<i>Addressing climate change, and achieving sustainability and zero carbon goals</i>).</p> <p>The Capacity Assessment identified 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.</p>

Section 3.3 (p. 14) 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 (p. 24) and Section 6.4 (p. 35) notes that improving the self-sufficiency of relevant towns is a key consideration of the councils.	
Considers that social and affordable housing should be located close to shops and services, and spread across Greater Christchurch.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ). 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 (p. 20) and Section 6.2 (p. 33) of Our Space.	
Considers that office space at the airport should be capped to encourage development in the Central City.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
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.	
<b>Officers' comment:</b> 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 Christchurch City Council, and addressed through other processes and mechanisms.	<b>Officers' recommendation:</b> No change to Our Space.
Notes that few hazards are identified in Selwyn and Waimakariri on the Natural Hazards map (Figure 10, p. 17).	
<b>Officers' comment:</b> Officers acknowledge that the purpose and scope of this map, as well as other constraints maps in Figure 10, could be clarified in Our Space.	<b>Officers' recommendation:</b> Amend Section 4.1 to clarify the purpose and scope of the constraints maps.

**Michael Steadman (014)**

Highlights the need to protect high quality soils to retain the ability for low-carbon, self-sustaining food production.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 3 ( <i>Protecting productive, agricultural and high quality soils from urban expansion</i> ) and 11 ( <i>Addressing climate change, and achieving sustainability and zero carbon goals</i> ).	
Supports higher density housing developments along transport corridors and considers that growth in the towns should only occur once rapid transit is in place.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 5 ( <i>Sequencing and staging of greenfield land</i> ) and 6 ( <i>Transport needs and implications, including for public and active transport</i> ).	

**Cashmere Park Trust (015)**

Landowner seeks the inclusion of land (within the PIB) on Leistrella Rd, Christchurch for future development.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	

<p>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.</p>	
<p><b>Officers' comment and recommendation:</b>                  Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>) and 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>	
<p>Notes that commercial developments in suburban locations should not be forgotten or disadvantaged by the planning framework.</p>	
<p><b>Officers' comment and recommendation:</b>                  Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p>	
<p>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.</p>	
<p><b>Officers' comment:</b>                  The Capacity Assessment identified a significant over-supply of industrial land across Greater Christchurch to meet demand over the long term. Section 3.3 (p. 14) of Our Space outlines these findings.</p>	<p><b>Officers' recommendation:</b>                  No change to Our Space.</p>
<p>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.</p>	
<p><b>Officers' comment and recommendation:</b>                  Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 (<i>Provision and protection of key infrastructure, and integration with development</i>).</p> <p>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 (p. 10) of Our Space outlines these findings.</p>	
<p>Notes that little account has been given to the future with autonomous vehicles and changing work practices.</p>	
<p><b>Officers' comment:</b>                  Regular monitoring of market indicators and trends will inform subsequent capacity assessments, which the NPS-UDC requires to be undertaken every three years. Such assessments will enable councils to respond to any changing travel and workplace behaviours.</p>	<p><b>Officers' recommendation:</b>                  No change to Our Space.</p>
<p>Notes that there is reference to Map A in Section 5.7 (p. 31) but that no map is provided.</p>	
<p><b>Officers' comment:</b>                  The reference to Map A in Section 5.7 (p. 31) of Our Space refers to Map A in Chapter 6 of the CRPS. Officers acknowledge this reference could be clarified in Our Space.</p>	<p><b>Officers' recommendation:</b>                  Amend Section 5.7 and any other sections to clarify the reference to Map A.</p>

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

<p>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.</p>
<p><b>Officers' comment and recommendation:</b>                  Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>

**Steve Holland (017)**

<p>Considers that social housing should be spread across Greater Christchurch and not grouped into any one area.</p>
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<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</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 (p. 20) and Section 6.2 (p. 33) of Our Space.</p>
<p>Supports the protection of transport corridors, development of more public transport options, such as rail, and promotion of electric transport modes.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 (<i>Transport needs and implications, including for public and active transport</i>).</p> <p>The option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.</p>

**Suzanne Vallance (018)**

<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 (<i>Poor intensification outcomes and preferences to focus intensification in the Central City</i>).</p> <p>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.</p>
<p>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.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 3 (<i>Protecting productive, agricultural and high quality soils from urban expansion</i>) and 11 (<i>Addressing climate change, and achieving sustainability and zero carbon goals</i>).</p> <p>The urban form promoted in Our Space is consistent with the existing strategic directions of the UDS and CRPS. Any broader considerations of Greater Christchurch's urban form would be best considered during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.</p>
<p>Notes that a resilient city has suitable redundancy, diversity, modularity and distribution of commercial activity.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p>
<p>Suggests solutions for housing an ageing population, including partitioning and building adaptable homes.</p>
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</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><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p> <p>The allocation of funding in council's Long Term Plans is out of scope for Our Space.</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.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p> <p>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 (p. 13) of Our Space outlines the findings on the sufficiency of housing development capacity.</p> <p>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 UDS and CRPS. The appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.</p>
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.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>) and 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>
Notes that private developers are unlikely to consider affordable housing without Government subsidisation.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>).</p>
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.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p>
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.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p>
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.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 (<i>Provision and protection of key infrastructure, and integration with development</i>)</p>

**Dalkeith Holdings Limited (020)**

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>

<p>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.</p>
<p><b>Officers’ comment and recommendation:</b>                  Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Sequencing and staging of greenfield land</i>).</p>
<p>Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.</p>
<p><b>Officers’ comment and recommendation:</b>                  Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p>

**Lionel Green (021)**

<p>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.</p>
<p><b>Officers’ comment and recommendation:</b>                  Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p> <p>The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.</p>

**Sharon Jones (022)**

<p>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.</p>	
<p><b>Officers’ comment and recommendation:</b>                  Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p> <p>Whilst acknowledging 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 full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.</p>	
<p>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.</p>	
<p><b>Officers’ comment and recommendation:</b>                  Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Sequencing and staging of greenfield land</i>).</p>	
<p>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.</p>	
<p><b>Officers’ comment:</b>                  The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.</p>	<p><b>Officers’ recommendation:</b>                  No change to Our Space.</p>
<p>Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.</p>	
<p><b>Officers’ comment:</b>                  The proposed change to the CRPS to identify future development areas in Rolleston, Rangiora and Kaiapoi seeks to ensure there is sufficient capacity to meet the demands</p>	<p><b>Officers’ recommendation:</b>                  No change to Our Space.</p>

for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 (p. 24) of Our Space outlines the proposed planning response.	
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**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Sequencing and staging of greenfield land</i> ).	
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.	
<b>Officers' comment:</b> The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.	<b>Officers' recommendation:</b> No change to Our Space.
Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.	
<b>Officers' comment:</b> The proposed change to the CRPS to identify future development areas in Rolleston, Rangiora and Kaiapoi seeks to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 (p. 24) of Our Space outlines the proposed planning response.	<b>Officers' recommendation:</b> No change to Our Space.

**CF Holdings Ltd - South Rolleston (024)**

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Sequencing and staging of greenfield land</i> ).	
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.	
<b>Officers' comment:</b> The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.	<b>Officers' recommendation:</b> No change to Our Space.
Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.	
<b>Officers' comment:</b>	<b>Officers' recommendation:</b>

The proposed change to the CRPS to identify future development areas in Rolleston, Rangiora and Kaiapoi seeks to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 (p. 24) of Our Space outlines the proposed planning response.	No change to Our Space.
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**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
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.	
<b>Officers' comment:</b> The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.	<b>Officers' recommendation:</b> No change to Our Space.

**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Sequencing and staging of greenfield land</i> ).	
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.	
<b>Officers' comment:</b> The appropriate process to consider such policy changes is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.	<b>Officers' recommendation:</b> No change to Our Space.
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
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.	
<b>Officers' comment:</b> Noted.	<b>Officers' recommendation:</b> Amend Figures 15 and 16.

**Victoria Foxton (027)**

Landowner seeks the inclusion of land (outside the PIB) on Port Hills Rd/Scruttons Rd, Christchurch for future development.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ) and 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the Central City</i> ).	
Questions the role of Christchurch City Council in providing and funding social and affordable housing.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ). 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 (p. 20) and Section 6.2 (p. 33) of Our Space.	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Questions why more industrial land shouldn't be made available instead of having enough to just meet demand.	
<b>Officers' comment:</b> The Capacity Assessment identified a significant over-supply of industrial land across Greater Christchurch to meet the projected demand over the long term. Section 3.3 (p. 14) of Our Space outlines these findings.	<b>Officers' recommendation:</b> No change to Our Space.
Supports the proposals for rapid transport corridors.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ).	

**M. Springer (028)**

Landowner seeks the inclusion of land (outside the PIB) in Prebbleton for future development.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	

**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	

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 (p. 13) of Our Space outlines the findings on the sufficiency of housing development capacity.
Notes that additional greenfield land may be required to meet demand in other towns, such as West Melton.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).
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 UDS and CRPS. The appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the CRPS scheduled for 2022. This review is identified in Section 6.2 (p. 33) of Our Space in the schedule of future work.
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.
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ) and 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ).
Supports commercial activities in the main town centres but considers that some activities may be better located outside these areas.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).
Highlights the uncertainties with the projected demands and the impacts of uncontrollable events.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).

### **Oderings Nurseries Limited (030)**

Landowner seeks the inclusion of land (outside the PIB) on Cashmere Rd, Christchurch for future development.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).
Identifies RMA processes, council charges and health and safety requisites as barriers to affordable housing.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ).
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.
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 6 ( <i>Transport needs and implications, including for public and active transport</i> ) and 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).
Notes that greenfield developments located near existing infrastructure is advantageous for councils and residents.
<b>Officers' comment and recommendation:</b>

Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 (*Provision and protection of key infrastructure, and integration with development*).

**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.

**Officers' comment:**

This land is identified as a Greenfield Priority Area for business on Map A of the CRPS. However, the recent Christchurch District Plan Review concluded that this land could not be rezoned at that time. Further consideration of this matter is proceeding between the landowner and Christchurch City Council.

**Officers' recommendation:**

No change to Our Space.

**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.

**Officers' comment and recommendation:**

Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 1 (*Accuracy and uncertainties of projected demands*) and 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

**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.

**Officers' comment 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*).

**Geoff Marks (034)**

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

**Officers' comment and recommendation:**

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*).

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.

**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.

**Officers' comment 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*).

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

<b>Officers' comment:</b> Noted. The scale of Figure 16 is not appropriate to identify such detail.	<b>Officers' recommendation:</b> No change to Our Space.
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**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ) and 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the Central City</i> ).	
Supports providing a range of new housing types and developing a social and affordable housing action plan.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ).	
Seeks more urgent provision for high frequency public transport and active transport modes.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ). The option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.	
Promotes putting power and telephone lines underground to improve the amenity of existing residential areas.	
<b>Officers' comment:</b> Noted. This matter is more appropriately addressed through more detailed planning and development processes at a local authority level.	<b>Officers' recommendation:</b> No change to Our Space.
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.	
<b>Officers' comment:</b> Noted. No changes to the current regulatory framework with regard to these issues is recommended in Our Space.	<b>Officers' recommendation:</b> No change to Our Space.

**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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 11 ( <i>Addressing climate change, and achieving sustainability and zero carbon goals</i> ). 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 (p. 13), which is projections-led over the medium term and principles-based over the long term. 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 (p. 20) and Section 6.2 (p. 33).	
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.	
<b>Officers' comment:</b>	<b>Officers' recommendation:</b>

Our Space is a high level, strategic document that seeks to ensure there is sufficient land available to meet future housing and business demand. 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 relevant discussions.	No change to Our Space.
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**Cathedral City Development Ltd (038)**

Landowner seeks inclusion of additional land (outside the PIB) on Port Hills land, Christchurch.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results likely to be inaccurate.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.	
<b>Officers' comment:</b> The assessment of sufficiency of housing development capacity underpinning <i>Our Space</i> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Christchurch International Airport (039)**

Advises that noise contours are currently being re-modelled with revised contours available in early 2019.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ). Comment noted. This matter can be addressed as part of subsequent RMA processes.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Considers airport should be recognised as a Key Employment, Commercial and Transport Node and assists in providing for medium to long term commercial needs.	

<p><b>Officers' comment:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood</i>).</p> <p>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.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
<p>Suggests some airport land would be appropriate to meet identified shortfall of commercial land in the NW of Christchurch.</p>	
<p><b>Officers' comment:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas (including specific sites proposed in each district)</i>).</p> <p>The Business Capacity Assessment identifies a localised shortfall of commercial land in the northern quadrant of Christchurch City. 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 at this time because:</p> <ul style="list-style-type: none"> <li>- there is sufficient inner city industrial land available to transition to commercial use to meet longer term needs</li> <li>- future monitoring will identify the extent of any shortfalls</li> <li>- 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 the next capacity assessment and district plan reviews.</li> </ul>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
<p>Seeks extension of the airport designation towards Ryans Road to accommodate air freight related distribution and warehouse activities.</p>	
<p><b>Officers' comment:</b></p> <p>Our Space identifies a significant oversupply of industrial land across Greater Christchurch. If however, 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.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
<p>Seeks identification of an Airport to Central City Rapid Transit Route</p>	
<p><b>Officers' comment:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Transport needs and implications, including public transport</i>).</p> <p>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. <i>Our Space</i> (Section 5.2, page 22) 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.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
<p>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.</p>	

<p><b>Officers' comment:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Transport needs and implications, including public transport</i>).</p> <p>Strategic freight routes were not identified in <i>Our Space</i>, 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.</p> <p>The NZTA has completed a Programme Business Case which outlines future upgrades of Russley Road; e.g. the upgrade of Sawyers arms intersection, reshape 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 <i>Our Space</i>.</p>	<p><b>Officers' recommendation:</b></p> <p>Amended wording for Section 5.6, p27 to provide greater explanation of freight hubs/networks and strategic infrastructure, with potential identification in Figure 18</p>
<p>Flood hazard map should show full extent associated with a breakout of the Waimakariri River.</p>	
<p><b>Officers' comment:</b></p> <p>Noted. 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 stopbank. However, within the secondary stopbank 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.</p>	<p><b>Officers' recommendation:</b></p> <p>Amend Figure 10 to depict full extent of high hazard flooding areas.</p>
<p>Bird strike should be an identified hazard.</p>	
<p><b>Officers' comment:</b></p> <p>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; an appropriate set of rules is included in the Christchurch District Plan.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

### **Ben and Sally Tothill (040)**

<p>Landowner seeks inclusion of additional land (outside the PIB) on Marshs/Shands Road by CSM2 in Selwyn.</p>	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>	
<p>Some land is now dissected by location and construction of CSM2 and more appropriate for industrial use.</p>	
<p><b>Officers' comment:</b></p> <p>Comments noted. 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. Section 3.3 (p. 14) of <i>Our Space</i> outlines these findings. Whilst there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, officers consider that the appropriate process to consider the merits of any expansion of the PIB and/or other enabling policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

### **Spokes Canterbury (041)**

<p>Suggests links are included to relevant documents – e.g. public transport routes, airport noise zone restrictions, urban boundaries, water shed protection areas.</p>	
<p><b>Officers' comment:</b></p> <p>Figure 6 on page 8 of <i>Our Space</i> identifies relevant plans, strategies and programmes, including the Regional Public Transport Plan, Canterbury Regional Policy Statement and District Plans.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

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.	
<b>Officers' comment:</b> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Mandate cycle networks within and between neighbourhoods and towns.	
<b>Officers' comment:</b> Noted. CCC has invested and is planning to continue to invest significantly in developing improved cycle infrastructure.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ), 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ) and 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Explore 'value capture' and make this a requirement in the plan.	
<b>Officers' comment:</b> Comment noted. Value Capture can be explored as part of a range of related business cases.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Our Space needs to take account of sea level rise.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 11 ( <i>Addressing climate change and achieving sustainability and zero carbon goals</i> ). 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.	
Concern that much of the land for greenfield development is agricultural.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 3 ( <i>Protecting productive/agricultural/high quality soils from urban expansion</i> ).	

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

Supports the submission from Sustainable Ōtautahi Christchurch.	
<b>Officers' comment:</b> Officers' comments and recommendations have been provided in relation to the submission points raised by Sustainable Ōtautahi Christchurch (see Submission 037). The expertise and perspective provided by Third Sector Organisations in spatial planning	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

processes is invaluable and welcomed. Before there are changes to zoning at a local level there will be further consultation and local input through District Plan Reviews and development of structure plans.	
Suggests the role of Third Sector Organisations as collaborative partners should be explicit in the document.	
<p><b>Officers' comment:</b> Officers consider that the role of Third Sector Organisations as collaborative partners could be referred to more explicitly in Our Space.</p>	<p><b>Officers' recommendation:</b> Add a reference to third sector organisations in the second para of section 6.3 beginning "Although the implementation...".</p>

**Red Spur Limited (043)**

Landowner seeks inclusion of additional land (outside the PIB) on Kennedys Bush Road, Christchurch.	
<p><b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<p><b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).  The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results likely to be inaccurate.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.	
<p><b>Officers' comment:</b> The assessment of sufficiency of housing development capacity underpinning <i>Our Space</i> 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><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</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><b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<p><b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<p><b>Officers' comment:</b> This submission point is better considered through subsequent RMA processes.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>

**Simon Britten (044)**

Seeks investment in active transport and public transport.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ).	
Need for a more supportive approach to creative affordable housing solutions with current rules a barrier.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ). Our Space does not limit the potential for appropriate innovative housing options. The comment regarding rule provisions in the Christchurch District Plan is noted for consideration by officers outside this process.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Tony Dale (045)**

Predictions to 2048 are probably wrong.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).	
Highly productive agricultural land should not be wasted.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ) and 3 ( <i>Protecting productive, agricultural and high quality soils from urban expansion</i> ).	
Intensification north of Riccarton is occurring but need ways to encourage central city population rather than around suburban centres.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the Central City</i> ).	
Social and affordable housing could revitalise the city centre.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> ).	
Commercial activity should be directed towards the city centre rather than suburban centres.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Supports reversion of converted industrial premises in eastern Christchurch back to industrial use.	
<b>Officers' comment:</b> Comments noted, however this is outside the scope of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Don Babe (046)**

Encourage more of the growth within the Central City.
<b>Officers' comment and recommendation:</b>

Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ).	
Less caveats on new development and development levy discounts for affordable housing.	
<b>Officers' comment:</b> Comments noted. This falls outside the scope of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
2013 Census biased due to EQ work so cannot be relied upon.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).	
Considers BAU approach needs to be tested in light of changes since the original strategy.	
<b>Officers' comment:</b> Comments noted. The proposals set out in <i>Our Space</i> are 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 key growth issues for Greater Christchurch identified in Section 4 of <i>Our Space</i> . 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 1 ( <i>Accuracy and uncertainties of projected demands</i> ) and 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ).	
Most jobs in the central city impact travel and transport infrastructure from outlying areas.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ).	
Transport, infrastructure, social, health and business agglomeration benefits of more housing in the city.	
<b>Officers' comments:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ).	
Carrot and stick approach needed to encourage more development in the city.	
<b>Officers' comment:</b> Comments noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).

Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The submitter has not provided any evidence to support statements that the methodology is flawed and results are likely to be inaccurate, nor why they consider <i>Our Space</i> does not give effect to the NPS-UDC.	
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.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<b>Officers' comment:</b> This submission point is better considered through subsequent RMA processes.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Olly Powell (048)**

Questions need for growth and considers city to already be a good size and growth would impact this.	
<b>Officers' comment:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ). Comments noted, however national policy (National Policy Statement – Urban Development Capacity) requires Greater Christchurch councils to ensure there is sufficient development capacity to support projected population growth. This is explained in section 1 of <i>Our Space</i> . Further, <i>Our Space</i> does not propose any additional greenfield future development areas for Christchurch City (beyond those already identified in the CRPS 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).	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Transpower New Zealand Ltd (049)**

Impact on National Grid and giving effect to NPSET unclear, appropriate buffer from critical infrastructure.	
<b>Officers' comment:</b> 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. Relatively small areas of Residential Suburban and Residential Hills zoned land is 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

<p>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.</p>	
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**Grant Poultney (050)**

<p>Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.</p>	
<p><b>Officers' comment:</b>  Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).  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.</p>	<p><b>Officers' recommendation:</b>  No change to <i>Our Space</i>.</p>

**Suburban Estates Ltd, Sovereign Palms Ltd and Doncaster Developments (051)**

<p>Landowner and developer in Rangiora, Kaiapoi, Christchurch and Prebbleton.</p>	
<p><b>Officers' comment:</b>  Noted.</p>	<p><b>Officers' recommendation:</b>  No change to <i>Our Space</i>.</p>
<p>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.</p>	
<p><b>Officers' comment:</b>  Our Space is guided by the vision, principles and strategic goals of the UDS, which were developed after extensive consultation and represent the collective aspirations and preferences of people in Greater Christchurch. Section 2.3 (p. 4) 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.  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.</p>	<p><b>Officers' recommendation:</b>  No change to <i>Our Space</i>.</p>
<p>Seeks that the Projected Infrastructure Boundary / Urban Limit lines be removed from the update, the CRPS and other planning documents.</p>	

<p><b>Officers' comment:</b></p> <p>Map A was inserted into the CRPS through the LURP, having previously been included in Plan Change 1 to the CRPS. The PIB 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 CRPS. Officers consider that the appropriate process to consider the merits of such a policy change is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
<p>Seeks inclusion of additional land (outside the PIB) in north-west Rangiora and south-west Prebbleton.</p>	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p>	
<p>Expresses concern that the approach in <i>Our Space</i> 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.</p>	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>) and 6 (<i>Sequencing and staging of greenfield land</i>).</p>	
<p>Seeks that the future development area identified in Kaiapoi is a Greenfield Priority Area.</p>	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 6 (<i>Sequencing and staging of greenfield land</i>).</p>	
<p>Areas of Christchurch existing zoned land to remain undeveloped due to geotechnical remediation costs.</p>	
<p><b>Officers' comment:</b></p> <p>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 at least. 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.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

### **Woolworths New Zealand Limited (052)**

<p>Landowner seeks inclusion of additional land (outside the PIB) cnr of Marshlands/Prestons Road, Christchurch.</p>	
<p><b>Officers' comment:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>).</p> <p>The business capacity assessment identifies that there is sufficient capacity to meet medium term needs in Christchurch City with any shortfalls not emerging until the long term. <i>Our Space</i> proposes that these shortfalls will be met through the transitioning of inner city industrial land over time, if and when needed. Although localised shortfalls are identified in the capacity assessment, including a 10ha shortfall in the northern quadrant of the City, where the submitter's land is located, this 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 is not supported at this time because:</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

<p>- there is sufficient inner city industrial land available to transition to commercial use to meet longer term needs</p> <p>- future monitoring will identify the extent of any shortfalls</p> <p>- 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 the next capacity assessment and district plan reviews.</p> <p>Significant capacity exists at the Belfast/Northwood Key Activity Centre which, together with the Central City, is afforded primacy in the CRPS and District Plan. Both policy documents promote intensification of centres and limited outward growth. Where outward growth is justified, it must, among other things, ensure that the function of other centres is not undermined. Both the Belfast/Northwood and Central City are not yet performing their intended roles, and it would contrary to policy to promote growth of Prestons neighbourhood centre where an assessment of its impact on these centres has not been undertaken.</p> <p>The submitter makes reference to potential CRPS and district plan changes to commercial policy and zoning as it applies to Belfast/Northwood KAC and North West Belfast Neighbourhood Centre. These are matters for the CRPS, District Plan reviews and / or plan changes to consider in the future, and are outside the scope of the Our Space process.</p>	
<p>Land has opportunities for commercial and residential development.</p>	
<p><b>Officers' comment:</b> Comments noted.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>

**Cockburn Family Trust (053)**

<p>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.</p>	
<p><b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>). Officers note that the Capacity Assessment identified a significant oversupply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 (p. 14) of Our Space outlines these findings.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>

**Grassmere Residents (054)**

<p>Should develop land in the City first to create density and vibrancy.</p>	
<p><b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 2 (<i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i>).</p>	
<p>Take care not to build on land suited for growing food.</p>	
<p><b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 3 (<i>Protecting productive/agricultural/high quality soils from urban expansion</i>).</p>	
<p>Partner with Government to help finance affordable housing.</p>	
<p><b>Officers' comment and recommendation:</b></p>	

Refer to the officers' comments and recommendations outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ).	
More extensive use of development contributions to build infrastructure.	
<b>Officers' comment:</b> Comment noted however this submission point falls outside the scope of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Hughes Developments Limited (055)**

Provision of additional greenfield land in Rolleston is essential.	
<b>Officers' comment:</b> Comment noted. 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).	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Current supply levels identified in the capacity assessments potentially do not reflect what is actually happening.	
<b>Officers' comment:</b> Comment noted. 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Graeme Alan and Joy Yvonne McVicar (056)**

Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results are likely to be inaccurate.	
Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.	
<b>Officers' comment:</b> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers' comment:</b>	<b>Officers' recommendation:</b>

Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	No change to <i>Our Space</i> .
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<b>Officers' comment:</b> This submission point is better considered through subsequent RMA processes.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**B. Welsh, S. McArthur, T. Kain (057)**

Landowner seeks inclusion of additional land (outside the PIB) in NW Belfast, Christchurch.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).

**Canterbury District Health Board (058)**

Need to ensure greenfield development enables easy access to core amenities, nearby public services and employment opportunities.	
<b>Officers' comment:</b> Comment noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Supports 10 minute community diagram but notes not specifically identified for implementation.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
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.	
<b>Officers' comment:</b> Comment noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Evidence provided by capacity assessment should be supplemented by information from communities on what they want and need.	
<b>Officers' comment:</b> Officers agree that the evidence provided by capacity assessments would usefully be supplemented by information related to where people want to live, the type of housing they wish to live in, the way they want their neighbourhoods and communities to interact and function. This could form part of future capacity assessments and/or district plan and CRPS review processes detailed in the Schedule of further work in Section 6.2.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Considers densities around key centres to be key to the success of <i>Our Space</i> .	
<b>Officers' comment and recommendation:</b>	

Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a ‘10-minute neighbourhood’</i> ).
Suggests the document makes a clear statement as to the importance of building strong, connected neighbourhoods using the 10 minute neighbourhood as an example.
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a ‘10-minute neighbourhood’</i> ).
Notes that specific populations may require additional resourcing for active and public transport infrastructure e.g. Eastern areas of Christchurch.
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ). Comments noted, however this falls outside the scope of <i>Our Space</i> .
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.
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to themes 5 ( <i>Transport needs and implications, including public transport</i> ) and 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ).
Considers Our Space does not deal strongly with natural capacity and resource sustainability, and suggests there could be stronger links to zero carbon plans.
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 11 ( <i>Addressing climate change and achieving sustainability and zero carbon targets</i> ).

**Ernst Frei (059)**

Landowner seeks inclusion of additional land (outside the PIB) on Cashmere Road, Christchurch.	
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<b>Officers’ comment and recommendation:</b> Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results are likely to be inaccurate.	
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.	
<b>Officers’ comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers’ recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers’ comment:</b>	<b>Officers’ recommendation:</b>

Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	No change to <i>Our Space</i> .
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<b>Officers' comment:</b> This submission point is better considered through subsequent RMA processes.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**GFR Rhodes Estate & Larson Group (060)**

Landowner seeks inclusion of additional land (outside the PIB) in Prebbleton.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Propose zoning for smaller more affordable sections based on Urban Economics assessment of Prebbleton.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (Provision of social and affordable housing)	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results are likely to be inaccurate.	
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.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<b>Officers' comments:</b> This submission point is outside the scope of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Martin Pinkham (061)**

Sees a lack of long term planning in Waimakariri and a need for standalone infrastructure authorities.	
<b>Officers' comment:</b>	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

Noted. 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.	
Lower development contributions, more apartments, improved legislation to improve housing affordability.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ).	

**Townsend Fields Limited (062)**

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.
Support welcomed.
Greenfield priority area should be rezoned ahead of identified future urban areas.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Sequencing and staging of greenfield land</i> ).

**Carolina Homes Limited (063)**

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.
Support welcomed.
Greenfield priority area should be rezoned ahead of identified future urban areas.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Sequencing and staging of greenfield land</i> ).

**Riccarton Bush Kilmarnock Residents Association (064)**

Considers future projections beyond 2030 based on data sets to be risky approach.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).
Intensification in existing areas ongoing, such as Riccarton, but no on-site parking causes problems, including health and safety issues.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ).
Avoid large medium density communities due to potential social problems.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ) and 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ).
Disagree with one-size-fits-all approach to greater living densities around key centres.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ).

Difficult and expensive to impose a comprehensive new public transport system with low current patronage.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).
Still a reliance on cars and plans should be more pragmatic and realistic.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).

**Scarborough Hill Properties Ltd and Directors/Shareholders Ruth Kendall & Ewan Carr (065)**

Landowner seeks inclusion of additional land (outside the PIB) in Scarborough, Christchurch.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Concern that uncertainties will mean identified development opportunities will not be realised.	
<b>Officers' comment:</b> The assessment of sufficiency of housing development capacity underpinning <i>Our Space</i> includes an additional capacity margin as required by the NPS-UDC, to account for sites that may not presently be feasible to develop.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Lacks flexibility to accommodate all needs and/or future market changes.	
<b>Officers' comment:</b> <i>Our Space</i> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**AgResearch (066)**

Need to provide sufficient buffer between research farms and urban development.	
<b>Officers' comment:</b> Comment noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Maintain PIB in current proposed position for Rolleston and Lincoln.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ). Comment noted. <i>Our Space</i> does not propose any changes to the PIB.	

**Lyttelton Port Company (067)**

Seeks extension of urban limits (PIB) to account for port reclamation area.	
<b>Officers' comment:</b>	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

Officers consider that the appropriate process to consider any alteration to the PIB is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	
Seeks that sensitive activities are avoided in any development adjacent to the Midland Port facility in Rolleston.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ).	
Include strategic freight routes and upgrading of the Brougham Street section of SH76 and possible Lyttelton freight tunnel.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 5 ( <i>Transport needs and implications, including public transport</i> ) and 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ). 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 <i>Our Space</i> document. Constraints with SH76 are identified in the Business Capacity Assessment which informs <i>Our Space</i> . Further investment options are better investigated through LTMA processes.	<b>Officers' recommendation:</b> Amended wording for Section 5.6, p27 to provide greater explanation of freight hubs/networks and strategic infrastructure, with potential identification in Figure 18.
Highlight constraints on rail network impacting freight now and into the future with expected growth.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	
Supports roading overpass proposed at Rolleston.	
<b>Officers' comment:</b> Noted. Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ). 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Fully supports the ChristchurchNZ/Development Christchurch Ltd submission (Submission 077).	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ). However, the CCBA does note support for the submission made by Christchurch NZ/Development Christchurch Ltd, which raises such issues as the need for an active approach to settlement planning that delivers strategic priorities, the importance of focusing development in and around the Central City, and concerns around the evidence	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

used to prepare Our Space. Officers' comments and recommendations have been provided in relation to these submission points (see Submission 077).	
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**Lincoln Developments Ltd (069)**

Landowner seeks inclusion of additional land (outside the PIB) in north Lincoln.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ). The Housing Capacity Assessment and supporting methodology has been peer reviewed and endorsed by the Ministry for the Environment and MBIE. The submitter has not provided any evidence to support statements that the methodology is flawed and results are likely to be inaccurate.	
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.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Proposes that Figure 16 should be included in District Plans rather than the CRPS.	
<b>Officers' comment:</b> Officers consider that the appropriate process to consider such policy changes is during the review of Chapter 6 of the CRPS scheduled for 2022 as part of the full review of the CRPS. This review is identified in Section 6.2 (p. 33) in the schedule of future work.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that streamlined RMA processes be used to rezone the submitter's land.	
<b>Officers' comment:</b> This submission point is better considered as part of subsequent RMA processes.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Brendon Harre (070)**

New development in Waimakariri and Selwyn should be integrated with new rapid transport services.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	
Use Urban Development Authority powers to achieve a mix of housing.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ).	
Queries decline in growth from 2023 for all growth scenarios (page 9).	
<b>Officers' comment:</b> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Densification requires rapid transport with delivery in the short to medium term.	

<b>Officers' comment and recommendation:</b>	
Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	
End current dependence on the automobile.	
<b>Officers' comment and recommendation:</b>	
Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ) and 5 ( <i>Transport needs and implications, including public transport</i> ).	

**Allan Downs Ltd (071)**

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.	
<b>Officers' comment:</b> Support welcomed.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Greenfield priority area should be rezoned ahead of identified future urban areas.	
<b>Officers' comment and recommendation:</b>	
Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Sequencing and staging of greenfield land</i> ).	

**Kevin and Bonnie Williams (072)**

Seek to develop land on Marshs Road, Prebbleton for rural residential use.	
<b>Officers' comment and recommendation:</b>	
Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas, including specific sites proposed in each district</i> ).	
Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology and do not consider rural residential development.	
<b>Officers' comment:</b> Development capacity does include rural residential development capacity.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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.	
<b>Officers' comment:</b> 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. No further provision for industrial land is considered necessary at this time. The GCP 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Christchurch City Council (074)**

Inconsistencies in Our Space.	
<p><b>Officers' comments:</b></p> <p>Table 3 of <i>Our Space</i> 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 <i>Our Space</i>, 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) <i>Our Space</i> refers to a 'potential shortfall in capacity' in relation to this matter.</p> <p>Updated feasibility analyses for Selwyn and Waimakariri Districts completed prior to the <i>Our Space</i> consultation period but too late to be incorporated into the <i>Our Space</i> document were included as part of the supporting consultation material. This was therefore available to submitters (and is referenced in the CCC submission) and reinforced the work required to refine feasibility and sufficiency conclusions as part of a final <i>Our Space</i> document.</p>	<p><b>Officers' recommendations:</b></p> <p>See officers' recommendations outlined in Appendix F</p>
Updating proposed policy interventions to reflect emerging data.	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected future demand</i>).</p> <p>Throughout <i>Our Space</i> 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).</p> <p>The CCC submission reports recent consenting data and population estimates and suggests that the housing targets in Table 2 of <i>Our Space</i> may under-estimate the City's ability to meet growth demands.</p> <p>The NPS-UDC requires that minimum housing targets are set for each territorial authority comprising a high growth urban area. These targets then underpin the requirement for a future development strategy to demonstrate that sufficient, feasible development capacity is enabled to meet demand.</p> <p>As outlined in <i>Our Space</i>, the long term housing targets do envisage a greater share of new households in Greater Christchurch to occur through redevelopment in the City, responding to projected changes in demand. It is important to note that these are minimum housing targets and therefore <i>Our Space</i> needs a high degree of confidence that they can be achieved and that such supply can meet the price and housing type aspects of projected demand.</p> <p>While recent consenting data may provide encouragement that targets can be achieved or exceeded, Table 4 (page 10) of the Options Assessment report, included as part of the supporting consultation material, shows the variability of building consents over different time periods and emphasises the lack of reliable post-earthquake building consent trends for Christchurch City.</p> <p>To provide some planning certainty and ensure the integrated and managed urban development goals of the UDS are achieved the <i>Our Space</i> section outlining housing targets (page 12) states that the targets 'represent the development capacity that each council will seek to enable through their relevant planning processes and mechanisms'. This is particularly important for Selwyn and Waimakariri Districts that have identified (or potential) shortfalls over the medium term and so guides the quantum of development capacity that each council should plan for through such process and mechanisms.</p> <p>In the case of Christchurch City, the District Plan is already very enabling of development. In the medium term Table 3 of <i>Our Space</i> identifies a surplus of existing zoned development capacity (i.e. over and above the Table 2 target of 17,400 households) of 38,875. The majority of development capacity arises from redevelopment opportunities in existing urban areas. If development uptake across the City continues to exceed a yearly average necessary to meet the medium term target of 17,400 households then a review of housing targets may be desirable, particularly if Greater Christchurch population growth is less than that adopted in <i>Our Space</i>.</p> <p>In the meantime there is no penalty to exceeding a minimum target and this would be valuable in demonstrating the attractiveness of city living and the success of land use changes and other interventions to achieve such ongoing results.</p>	

<p>If the submission seeks to adjust housing targets to constrain development opportunities in Selwyn and Waimakariri districts, this would be a significant departure from recent market conditions and would represent an approach with a higher risk of perverse housing market outcomes.</p>	
<p>Sequencing of development.</p>	
<p><b>Officers' comments:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 (<i>Sequencing and staging of greenfield land</i>)</p>	
<p>Intensification in townships and increase densities in greenfield areas and future development areas.</p>	
<p><b>Officers' comments:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 (<i>Reducing urban sprawl and developing in the City (central City) ahead of surrounding districts</i>)</p>	
<p>Factoring in rural capacity.</p>	
<p><b>Officers' comments:</b> Housing demand identified in <i>Our Space</i> Table 1 relates to both the urban and rural areas within Greater Christchurch, however the development capacity reported in Table 3 was calculated only from an assessment of urban and rural residential zones. This is noted in the sections on sufficiency (page 13) and section 5.3 (page 24) relating to future proposals for Selwyn and Waimakariri towns. At the time of preparing <i>Our Space</i> a calculation of rural development capacity in Selwyn and Waimakariri was not available and is complicated by the potential for district plan reviews to alter rural development capacity through more stringent subdivision policies. To more accurately reflect housing shortfalls in Table 3 of a final <i>Our Space</i> document an allowance for rural development capacity in each district would need to be determined, recognising that this will be updated in subsequent capacity assessments as required in response to any changes resulting from district plan reviews. To more accurately reflect housing shortfalls in Table 3 of a final <i>Our Space</i> document an allowance for rural development capacity in each district has been determined by using historic rates of uptake. This would be approximately 400-500 households for Waimakariri and 700 for Selwyn of rural capacity required over the next 10 years. However these numbers are subject to change for the following reasons:</p> <ul style="list-style-type: none"> <li>• lower demand for uptake over the past two to three years</li> <li>• lack of certainty around rural capacity due to: <ul style="list-style-type: none"> <li>○ unavailable results from Census 2018 at the time of this assessment</li> <li>○ change from Area Units to SA1 and SA2 classification by Statistics New Zealand (which has changed the geographical areas used to determine population estimates and projections) which has impacted on existing estimates / projections used in the assessment for the FDS</li> <li>○ potential impact of any policy changes made by Councils as part of their District Plan Reviews (Selwyn and Waimakariri)</li> </ul> </li> </ul> <p>As a result, these numbers are potential unreliable to use for any certainty and therefore we recommend that subsequent capacity assessments are required to respond to any changes resulting from district plan reviews / and Statistics New Zealand data (Census and updated Projections).</p>	<p><b>Officers' recommendations:</b> Amended numbers for Section 3.2, Table 3, p.13 as shown in Appendix F of this report.</p>
<p>Reviewing business sufficiency.</p>	
<p><b>Officers' comments:</b> Modelling of business demand was undertaken for the Capacity Assessment using the projected household demand in Table 1 of <i>Our Space</i>. With the development of <i>Our Space</i>, in particular the proposed housing targets in Table 2, there was insufficient time to</p>	<p><b>Officers' recommendations:</b> Amended figures for Section 3.3, Table 4 and Figure 9, p.14 to reflect</p>

<p>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 <i>Our Space</i> has now been completed and it is therefore appropriate that Table 4 of a final <i>Our Space</i> document is amended to reflect this more accurate assessment of business sufficiency.</p>	<p>changes based on updated projected employment resulting from the transitional approach to housing targets in <i>Our Space</i>.</p>
Addressing social and affordable housing.	
<p><b>Officers' comments:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing</i>)</p> <p>Figure 13 (page 20) of <i>Our Space</i> 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 <i>Our Space</i> section 6.2 specifically identifies this initiative for completion during 2019-2020.</p> <p>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 and the officer response outlined in this Officers Report). Section 5.3 (page 22) and Action 9 in section 6.2 (page 34) of <i>Our Space</i> 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><b>Officers' recommendations:</b></p> <p>No change to <i>Our Space</i>.</p>

### Ministry of Education (075)

Overall support for the proposed strategy, and the inclusion and consideration of social infrastructure.	
<p><b>Officers' comment:</b></p> <p>Support welcomed.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
Encourages councils to undertake early engagement with the Ministry when implementing development areas.	
<p><b>Officers' comment:</b></p> <p>The submitter notes that the Ministry is comfortable with its planning for schools in the proposed greenfield areas, but that there is some uncertainty of the location of intensification in the City and its implications for schools. Such matters are best discussed between the Ministry and individual councils as development areas are progressed.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
Support for the concept of a '10-minute neighbourhood' but notes there is limited commentary in <i>Our Space</i> .	
<p><b>Officers' comment and recommendation:</b></p> <p>Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 (<i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i>).</p>	
Encourages exploring opportunities for the Ministry and councils to share recreational and community facilities.	
<p><b>Officers' comment:</b></p> <p>Investigating opportunities to share facilities between the Ministry and councils falls outside the scope of <i>Our Space</i>. However, councils have noted this submission point for consideration outside this process.</p>	<p><b>Officers' recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>

### Carter Group Limited (076)

Landowner seeks inclusion of additional land (outside the PIB) in Kainga.
<b>Officers' comment and recommendation:</b>

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*).

**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><b>Officers’ comment:</b></p> <p>Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p> <p>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 UDS.</p> <p>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.</p> <p>As noted above, to accommodate these projected demands in a way that aligns with broader strategic aspirations for Greater Christchurch, the proposals in Our Space were guided by the strategic directions of the UDS. 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 UDS and Proposed Change 1 to the CRPS.</p> <p>The decision to adopt 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.</p>	<p><b>Officers’ recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
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.	
<p><b>Officers’ comment:</b></p> <p>Officers note 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.</p>	<p><b>Officers’ recommendation:</b></p> <p>No change to <i>Our Space</i>.</p>
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.	
<p><b>Officers’ comment and recommendation:</b></p> <p>Refer to the officers’ comment and recommendation outlined in Section 4 in relation to themes 2 (<i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i>)</p>	
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.	
<p><b>Officers’ comment and recommendation:</b></p> <p>Refer to the officers’ comment and recommendation outlined in Section 4 in relation to theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p> <p>Our Space adopts population projections that reflect recent growth trends in Greater Christchurch, with the rationale for the projections fully documented in the Capacity Assessment.</p> <p>Officers accept that Greater Christchurch’s unique post-earthquake circumstances do create additional uncertainties in terms of projecting the future. This uncertainty was managed by utilising the most up-to-date and robust projections at the time the Capacity Assessment was prepared, and considering a range of possible growth</p>	

<p>scenarios. The adopted projections should be monitored and reviewed as part of future capacity assessments, but for the purposes of a final Our Space document, it is recommended that the adopted projections are retained.</p>	
<p>Specific comment on the Executive Summary, that wellbeing strategies should inform and drive settlement pattern strategies, not be made to fit and complement them.</p>	
<p><b>Officers' comment:</b> Noted.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
<p>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.</p>	
<p><b>Officers' comment:</b> Officer acknowledge 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.</p>	<p><b>Officers' recommendation:</b> Amend Section 2.1 of Our Space to clarify that employment levels in the Central City remain below pre-earthquake levels.</p>
<p>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.</p>	
<p><b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 (<i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i>). Officers 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.</p>	<p><b>Officers' recommendations:</b> No change to Our Space.</p>

**Lincoln University (078)**

<p>Need to provide sufficient buffer between research farms and urban development.</p>	
<p><b>Officers' comment:</b> Comment noted.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
<p>Maintain PIB in current proposed position for Rolleston and Lincoln.</p>	
<p><b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 (<i>Need for further greenfield areas, including specific sites proposed in each district</i>). Comment noted. <i>Our Space</i> does not propose any changes to the PIB.</p>	

**KiwiRail Holdings Limited (079)**

<p>Support for UDS principles and strategic goals guiding Our Space, and reference to the GPS on Land Transport.</p>	
<p><b>Officers' comment:</b> Support welcomed.</p>	<p><b>Officers' recommendation:</b> No change to <i>Our Space</i>.</p>
<p>Industry and tourism growth is anticipated to result in some increased demand on the rail network.</p>	

<b>Officers' comment:</b> Comments noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ).  The rail network is a 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Need to ensure any new development does not generate reverse sensitivities for the rail network.	
<b>Officers' comment:</b> See comment above. No issues were raised in the submission in terms of the locations of proposed future development areas.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Will work with the Partnership where possible to assist in achieving the vision for the transport network.	
<b>Officers' comment:</b> Support welcomed.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment:</b> Noted. These matters will be further explored as part of transport business cases.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Include a reference in Section 5.6 of <i>Our Space</i> that future growth may require changes to the rail network.	
<b>Officers' comment:</b> These matters will be further explored as part of transport business cases and can be clarified as part of periodic reviews of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Expand the last paragraph in Section 5.7 of <i>Our Space</i> (beginning " <i>Further more detailed assessment...</i> ") to include consideration of how future growth areas will integrate with land transport.	
<b>Officers' comment:</b> These matters will be further explored as part of transport business cases and can be clarified as part of periodic reviews of <i>Our Space</i> .	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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).

**Officers' comment and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ) and 3 ( <i>Protecting productive / agricultural / high quality soils from urban expansion</i> ).
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.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ). The NZTA and Greater Christchurch councils 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.
Better transport options to industrial areas should be provided for.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).

**Malc Dartnall (081)**

Highlights a lack of larger houses.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ). 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. Proposals in Our Space seek 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.	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ). See response provided above.	
Considers there is a lack of industrial zoned land in Waimakariri.	
<b>Officers' comment:</b> Officers note that the Capacity Assessment identified a significant oversupply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 (p. 14) of Our Space outlines these findings.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**Helen Broughton (082)**

Concerned that this process is occurring so soon after the same issues were considered through the Christchurch District Plan Review.	
<b>Officers' comment:</b> Concerns noted. While it considered some of the same issues, the Christchurch District Plan Review was a different process, and specific to Christchurch City.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

Suggests that both low and medium growth projections should be used.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).	
Questions whether the decrease in home ownership in Christchurch identified on page 11 is realistic.	
<b>Officers' comment:</b> 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that given there is sufficient housing in Christchurch City major urban planning changes for Christchurch need not occur.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 9 ( <i>Provision of social and affordable housing and a range of housing types</i> ).	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).	

**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.	
<b>Officers' comment:</b> Comments noted. It is understood further information in support of this submission is being provided to the Hearings Panel and officers would welcome the opportunity to provide further advice on the matters raised.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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.	
<b>Officers' comment:</b> Comments noted. The National Policy Statement on Urban Development Capacity (NPS-UDC) requires councils to plan appropriately in order to meet population projections.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

Greater Christchurch is projected to grow and the NPS-UDC requires the Greater Christchurch councils to enable the supply of housing needed to meet demand and provide enough space for their populations to live and work.	
No assessment of the impact of further urban expansion on existing rural amenity or on holiday destinations.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ). The comment related to impacts on holiday destinations is noted, but is out of scope of matters considered in <i>Our Space</i> .	
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.	
<b>Officers' comment:</b> The proposals in <i>Our Space</i> support the delivery of the 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 Plan provisions play an important role in helping to deliver a broad range of housing types.	<b>Officers' recommendation:</b> No change.
Comments that new commercial development should be contained within existing commercial hubs where possible, particularly encouraging greater activity within the CBD.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	

**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).	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ).	
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ) and 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ).	
Our Space pays only lip service to reducing greenhouse gas emissions.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 11 ( <i>Addressing climate change and achieving sustainability and zero carbon goals</i> ).	
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.	
<b>Officers' comment and recommendation:</b>	

Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
Small scale retail and office development should be allowed in areas without sufficient existing amenities within walking distance.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ).	
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.	
<b>Officers' comment:</b> 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 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.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Considers priority should be given increasing / ensuring public transport access to industrial areas.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	
Supports higher densities within the current city limits.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ) and 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ).	

**Axel Wilke (087)**

Supports the sentiments expressed in Our Space.	
<b>Officers' comment:</b> Support welcomed.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
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.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ).	

**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.	
<b>Officers' comment and recommendation:</b>	

Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 3 ( <i>Protecting productive / agricultural / high quality soils from urban expansion</i> ) and 10 ( <i>Provision and protection of key infrastructure and integration with development</i> ).	
Comments that social housing does not mix well.	
<b>Officers' comment:</b> Noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Suggests that all vacant industrial land and buildings should be revitalised before planning for more industrial areas.	
<b>Officers' comment:</b> No new industrial areas are planned given the existing significant supply of industrially zoned land in Greater Christchurch.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Considers that the plan should show we care for the future and city environment not driven by the economy and greed.	
<b>Officers' comment:</b> Noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Comments that the transport network will only work if it is good and regular and private cars are banned from the central city.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ). The suggestion to ban cars from the city centre is out of scope of the matters considered in <i>Our Space</i> .	

**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.	
<b>Officers' comment:</b> Comments noted.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .
Agrees with intensifying the inner city and public transport corridors; disagrees within more auto-centric sprawl.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts</i> ) and 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ).	
Considers the plan should seek to allow commercial development everywhere it can and let businesses gravitate to the best location for them.	
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 8 ( <i>Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'</i> ). <i>Our Space</i> has been prepared in accordance with the existing principles of the UDS and policy framework of the CRPS. Both of these planning documents reinforce the centres-based approach. Any change in policy direction will be considered as part of the 2022 CRPS review.	<b>Officers' recommendations:</b> No change to <i>Our Space</i> .

Strongly agrees with promoting higher densities around key centres. Suggests that railway lines could be included as key future public transport routes.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 5 ( <i>Transport needs and implications, including public transport</i> ). Officers note that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

**Wayne Phillips (090)**

Large greenfields development in Rangiora and Rolleston will lock in auto dependence.
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 2 ( <i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i> ) and 6 ( <i>Transport needs and implications, including for public and active transport</i> ).
Planning for other transport options for such towns needs to take place now.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 6 ( <i>Transport needs and implications, including for public and active transport</i> ).
Encourage key worker housing (such as nurses, police, teachers).
<b>Officers' comment and recommendation:</b> Refer to the officers' comments and recommendations outlined in Section 4 in relation to themes 9 ( <i>Provision of social and affordable housing, and a range of housing types</i> )
Basing projections on high post-EQ rates is dangerous.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ).

**Landowners ODP 12 Rolleston (091)**

Landowners supporting inclusion of existing greenfield land (within PIB) on East Maddisons Road, Rolleston.	
<b>Officers' comment:</b> Support welcomed.	<b>Officers' recommendation:</b> No change to <i>Our Space</i> .

**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.
<b>Officers' comment and recommendation:</b> Refer to the officers' comment and recommendation outlined in Section 4 in relation to theme 4 ( <i>Need for further greenfield areas (including specific sites proposed in each district)</i> ). The evidence underpinning <i>Our Space</i> demonstrates a significant oversupply of industrial land within Greater Christchurch. The land identified in the submission is situated outside the PIB. Such land is best considered as part of subsequent RMA processes, including changes to the CRPS and district plans, and relevant LGA processes, including spatial planning exercises.

## Appendices

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- A Summary of Officers' Report authors qualifications and experience
- B Stakeholder review workshop
- C Key submission themes for the RPTP consultation
- D Legal advice on hearings process
- E Analysis of submissions
- F Assessment of key matters with different partner views

## APPENDIX A. Summary of Officers' Report authors qualifications and experience

### **Keith Tallentire**

Keith Tallentire is the Partnership Manager for the Greater Christchurch Partnership and has been in this post for seven years. He holds a Masters degree in Environmental Policy from Lancaster University and a BA Geography from Portsmouth University. He has over 25 years' experience in local government, both in New Zealand and the UK. The focus of current and past employment has related to strategic planning, sustainability and multi-agency partnerships, including regeneration projects in Wembley, Brixton and Greenwich in the UK and earthquake recovery advice through a secondment to CERA following its establishment in April 2011.

### **Sam Bellamy**

Sam Bellamy is a Senior Strategy Advisor and lead for the Urban Development programme at Environment Canterbury, having worked at the regional council since April 2017. Prior to this he worked for four years as an economic analyst and spatial planner for a consultancy in London, where he worked closely with local government, developers and landowners to produce a range of urban growth and regeneration studies. Sam holds a Masters degree in Planning, Growth and Regeneration from Cambridge University.

### **Tammy Phillips**

Tammy Phillips is a Principal Planning Officer at Environment Canterbury. She has been in this post since November 2017. Prior to this she spent 14 years working as a local government planner in London, involved in the development of strategic planning policy and working on a range of urban planning issues, with a particular focus on housing. Tammy holds a Masters degree in Regional and Resource Planning from Otago University.

## APPENDIX B. Stakeholder review workshop

# Our Space 2018-2048 – Integrated Planning Guide Workshop

Summarised feedback from 26 November 2018, Tūranga

## Process

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Participants from across a range of perspectives covering economic, community, transport, development, building, education, diverse populations and business were supported via Greater Christchurch Partnership members and staff from Community and Public health to assess the Our Space document against the Integrated Planning Guide. The Planning Guide identifies 14 criteria on which to assess any planning document using a broad wellbeing lens drawn on from economic, social, cultural and environmental aspects. Key questions are used to support conversations around what is already identified and what changes could strengthen the plan, in this case 'Our Space'.

Each group had wide ranging discussion as the GCP facilitators were able to both listen to the conversations and also to provide any guidance for questions that came up around scope and content. The scribes at each of the four tables collected notes from the discussion. The notes below are provided as part of the feedback on the Our Space consultation document and are also circulated to all participants.

## General comments

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The overarching feedback from participants was that it feels as though the Our Space document is trying to cover too broad a scope and consequently lacks the detail to provide clarity about future direction.

It is not immediately clear what Our Space is trying to achieve. Is it just meeting the NPS requirements and describing capacity? Or is it trying to achieve more?

While the document does try to explain how it fits into the National, regional and local context this complexity of plans, framework and the various governance bodies involved makes it really difficult for people to understand what level their concerns can be addressed at and where to put their effort into having a say. The amount of information given about other plans and documents may have also created confusion about the purpose and authority of Our Space.

There is a need to better frame what the document does and does not do and what other documents fill these gaps, perhaps via a more detailed statement of intent in the introduction. It was evident during discussion that a lot of people expected this document to cover a level of detail and scope which is actually managed via other regularity mechanisms (eg. the District Plan, LTPs, Regional Land Transport Plan, RMA). It would be beneficial to set out what this document does not intend to do in the scope to ensure people do not place unreasonable expectations on its impact.

Relevant sections should also be coupled with the relevant policy/plan. The transport section does this better than others as it uses wording from the draft RTP. For other sections a more explicit link which explains how the RTP and various LTPs and Annual Plans operationalise the concepts discussed in Our Spaces may be helpful to clarify the scope for readers.

While Ngāi Tahu values are rightly included, there is an opportunity to also acknowledge other values held by the wider population of Greater Christchurch.

The discussion on population growth does not discuss how along with the growth in the ageing population there is also a growing population of people with disabilities. This has a number of implications for transport and housing demand.

The participants very supportive of the 10-minute neighbourhood concept as a key aspiration as it would achieve positive outcomes for a number of the building blocks of health, however, and they were keen to see it more embedded in the document with more detail.

## Building Blocks of Health

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### Equity

The concept of equity was not explicitly addressed in the document, nor how this plan could address current inequities. There is no deprivation information provided or how the areas for key developments areas relate to deprivation. This made it difficult to judge whether the plan might not further exacerbate existing inequities. While the desire to support regeneration in eastern Christchurch is mentioned (page 16), the proposed plan focuses on developing housing and transport away from this area rather than proposing ways to address the disparities that have been heightened post-quakes.

One suggestion was that a more risk or needs based approach could have been used to address the perception that the plan was disconnected from the realities of current residents. The proposed plan seemed to be more 'business as usual' rather than taking the opportunity to more creatively address inequity and support resilience in the face of impending catastrophes (climate change, financial crisis). It also feels like it is an exercise to accommodate extra households and business rather than provide ways to improve existing conditions.

While the document acknowledges all the other related planning structures, the large amount of plans, policy and forums that become open to comment may marginalise people from having their say as it can be confusing to know at what level their concerns can be addressed. This marginalisation can affect equity.

### Food Security

Food security is not mentioned. While a map of versatile soils is included it is not clear whether the plan will protect productive soils and whether the soil map is a bottom line that determines where areas can be developed.

There were also concerns about how the plan addresses protecting productive soils in areas already developed or zoned for housing/business and how to encourage food production in those areas. Prestons Park was given as an example of where development was allowed on fertile land. Examples of opportunities of increasing food security include enabling roof top gardens and community growing spaces. This is perhaps best dealt with at another level of planning but this could be clarified.

### Public Services

There was strong support for the 10-minute neighbourhood concept but it was unclear how the document was going to support the achievement.

Discussion covered how shared resources such as a school being integrated with other services or play outside of school hours. Concerns around mental health, social isolation, etc., were missing in terms of how this document can help this through the development of integrated neighbourhoods and integrated transport. It will be important to access services across the city as well as those in your local area.

There was some feeling that the rationale for locations, developments and future growth was not clear in the document, particularly the placing of where things are and the key drivers.

## Natural Capital

It is difficult to see the connection with people which is part of natural capital. When walking through a locality participants want to be able to see the place, homes, amenities and the history as part of the environment. Using the term ecological instead of environment could help as it incorporates life not just the physical environment.

Participants suggested the importance of protecting primary habitats and natural ecosystems, some of which are already gone. Planting trees is not enough. While the plan notes outstanding natural landscapes it doesn't show how this influences decision making, how hazards are driving the planning process or mention mitigation (only adaptation). There was also concern about the best horticultural soils being built on and the implications for long term food supply.

## Housing Stock

The impression was that the transport routes are the driver of development.

While it is easier for developers to profit from greenfield development, brownfield development could be facilitated by incentives and funding. An exemplar development could inspire developers to see what's possible. This would need to be built into the community though using best practice urban design, not just a clump of disconnected house. Need to ensure that covenants are not unreasonable for new developments.

There is support for having a mix of housing types in a community so people can stay connected with their community/neighbourhood as their needs change over their life course. Need a future focus. There are not currently incentives for TLAs to provide social housing (e.g. not eligible for IRRs) with changing demand profile we need to look at accessibility/universal design and incentivising for Lifemark standards.

The need for affordable/social housing is growing and affordability needs to be maintained. Do we know how people want to live (i.e. housing size, sustainability)? Does it matter if they are homeowners or not? This might influence things. Need creative approaches to land and ownership. Why do people want to live in the CBD? Will need to engage and find out why and who could, not just the vocal minority.

It is important to consider multiple dimensions of wellbeing and what gives life to communities – sports centres, libraries, groups like neighbourhood associations

## Social and Community Capital:

It is Important to get people involved with lived experience in developing the document. Who decides what opportunities are created in/for a neighbourhood? Where is the co-ordination? It is hard to nurture volunteering/community spirit if people are busy.

How does greater Christchurch compare to other places, e.g. re 10-min neighbourhood? What could we monitor, what performance measures are there? How do we check this is what people want and which aspects are development issues and which are access issues? Are there enough 'blue' zones in Waimakariri (those likely to provide employment opportunities)?

Who are the people who are going to be living in the CBD? The handful of CBD housing that just came through took too long and is way too expensive. What employment opportunities will there be beyond government and hospitality. Before the earthquakes there was a greater mix. It was agreed that more housing in the CBD does make sense though as it already has many features of a 10-min neighbourhood.

Additional comments included: CPTED principles are useful; having a mix of people creates vibrancy; need to incentivise for good quality design; good research on the Lesley Keast development is available; and, need to look at existing amenities.

## Resource Sustainability

Is flood risk sufficiently accounted for? Is water sufficiently protected (e.g. aquifer recharge areas). What will be consequences for future generations? Do our actions match our values (e.g. value of pure water but water degraded?)

Growth may harm the environment but also about how we develop. Engineering enables building in many different places – but this can be expensive and may not balance with existing resources/amenities in area (e.g. employment opportunities). It is also important to recall why we shouldn't build in some places. It could potentially be difficult to house 150,000+ more people without having to consider using poorer quality land (i.e., will we need to develop in flood and tsunami prone areas?).

Although reflected in the document, it would have been useful to have a representative of Ngāi Tahu views in this area at the workshop to help with the discussion.

The spread of lifestyle blocks challenges resource sustainability. Intensification should be incentivised and for lifestyle blocks have mechanisms in place to ensure treat the land well and don't stay long.

There are a number of actions that could improve housing quality: programmes such as Home Star can improve sustainability of homes without adding much cost; councils could have a mandatory home performance certificate; or the building code could be hugely improved. Many actions are not complicated and are affordable. There was a question of what to do with existing unsustainable houses as new homes alone won't solve sustainability issues.

The sufficiency of continuing to use the 2007 UDS vision was questioned given all the regeneration planning. Plans are not as nimble as developers so plans can be irrelevant to them.

## Economic Development

The document does have important economic implications for transport planning, employment opportunities, links to the port, etc.

A key issue will be attracting the right people to come and stay here. We need to ask who the people we want to attract are, then what are the key drivers for attracting them and what would be the tipping points to make them leave (i.e. commuter journey time). Christchurch needs to be an attractive place to live (especially for the ageing population) with quick travel times, education opportunities/providers, and quality natural environments (open space/parks, sea, close to the mountains). It needs to encourage and allow for prosperity.

There is a major focus on transport but the document is light in terms of other infrastructure. The focus on Key Activity Centres is important but it doesn't promote the importance of the central city enough. Does the plan sufficiently support the KACs in the east? The question of risk was also raised in terms of who should have the risk, do developers assume too much and how can people be enabled to take on more risk and have more options.

## Cultural Diversity

We need to promote and build integrated communities. The plan needs to be relevant for all. Start by looking at common interests like environment and education and focus on what can be done to attract people to live in Greater Christchurch and what can/needs to be done to keep people living here. The 10-minute neighbourhood principle is one of the most important in the document and what could make Greater Christchurch unique and attractive. Successful implementation and delivery of this is key to the success of the city

Housing needs to have a diversity of housing stock /typologies, not just small houses, as will also need others with capacity for multi-generational living and mixed use in in Central City and other Key Activity Centres.

## Active Lifestyles

Need to protect access to parks, open spaces, sea, and mountains.

Need a shift from BAU. It was felt that concentrating growth in Rolleston and Rangiora will not encourage active lifestyles. It is important to encourage growth in eastern Christchurch and the Central City. Uptake of more active lifestyles will depend on a shift in attitudes/perception and an acceptance that living in consolidated urban forms such as mixed use areas can lead to better health outcomes/active lifestyles. The 10-minute neighbourhood principle is the most important to promote this.

## Transport

Need a more connected cycle network (MCR's are great- but don't all connect well to each other, or between neighbourhoods). The commitment to cycling needs to be better reflected. Urban development over greenfield development must be prioritised. "Cycle freeways" that connect communities around the city are not in any transport plan but are done in other parts of NZ.

Will rapid public transport (PT) corridors further encourage urban sprawl? Will they fulfil the expectation that PT will meet the needs of people getting where they want to go? We need to look at where we intentionally want development to go and the transport options for routes associated and not just base it on where it seems to be happening already.

The impact of autonomous vehicles and growth in electric vehicles also needs to be considered and planned for.

Do we prioritise some transport modes over others? The plan appears to prioritise buses rather other modes of PT or active transport. How are the priorities set? There are pros and cons to each.

Freight traffic is going to increase and with limited options for transport there are implications for safe efficient routes that do not intersect with active travel routes nor residential areas.

The concept of the 10-minute neighbourhood was encouraged as this would support an efficient transport system, however the inclusion of a 10 minute ride was questioned as that would take you out of your local community. More details of how the concept will be supported are needed in the document.

There was tension about including the workplace in the 10-minute neighbourhood concept as well as this seemed counter to promoting working in the CBD. How can we ensure the transport system meets this gap? How do we support having jobs closer to housing (or vice versa)? How do we encourage occasionally working from home as an option to reduce burden on transport system?

The plan could use a value capture and explore public versus private benefits. If there is incentive to do so drawing connections between investment and outcome.

## Neighbourhood Amenity

It was unclear if the 10 minute neighbourhood model is for 100% of the population, or just those who live in the central city? There is a tension between density and amenities. Need information on who will want to live in these neighbourhoods (central city) compared to traditional housing.

Recreation is missing from 10 minute neighbourhood model. This is an important consideration as part of our city's attraction. Some amenities agreed as essential (eg. a primary school). No mention of value capture. Also how many people can live in a 10-minute neighbourhood? Is there a target? Will greenfield development be built to this and which amenities should all communities have? Who is responsible to ensure they exist?

The development strategy needs to encourage equitable outcomes, such as quality and connections for development in the eastern side of CBD compared to west. Will this plan provide an ability to hold developers/ TLAs to account?

There is little detail on heritage. Heritage, community identify and culture connects people.

A lot of these matters would be covered in the District Plan- the link needs to be made clear, otherwise there is risk if Our Space trying to cover what it shouldn't (rules and regulations as to what is build where and how). This might include legal implications of cross-leases and other ways of doing things to ensure the right amenities are developed in communities

### Community Safety

Design is important to promote community safety such as the density of housing, space to interact on the street, amenities and where they are, housing design (for 8-80), and not just large open spaces. Universal design should be a key principle for development.

Consideration for accessibility and ensuring communities do not become isolated/ severed from one another during repairs and development.

Universal Design is important. However this may be covered in other documents.

### Community Resilience

The document is lacking detail on climate change / sea level rise, food resilience, urban and agriculture interface. For example, it could provide maps of areas affected for 1, 3, 5m sea level rise, nitrogen impacts etc).

Need to plan to build community NGO and encourage strong local communities with day-to-day/social resilience not just during disasters. This feedback was for the IPG tool also to refer to the National Disaster Resilience Strategy. Building community resilience can be difficult when funders are central.

Other options that can promote resilience need to be identified. For example, housing density has opportunities to promote connections and create resilience. This same for affordable housing and mixed communities. Also need take into account differences between urban and rural communities. Energy efficient buildings are also important.

## APPENDIX C. Key submission themes for the RPTP consultation

### Rail

There was a strong theme from submitters on the role of rail-based solutions in the draft Plan. The draft Plan includes providing for rapid transit in its future vision and no single mode of transport is preferred or ruled out.

The NZ Transport Agency, Christchurch City Council, Environment Canterbury, Selwyn District Council and Waimakariri District Council are working together to investigate advanced rapid transit technologies which could include rail, through the Future Public Transport Business Case process.

### Service improvements

There were a significant number of submissions relating to requests for service improvements through route changes or scheduling amendments, as well as for the hours of service for public transport to be extended, particularly in the evenings and during weekends.

These requests have all been noted by the hearings panel and referred to Environment Canterbury to be considered as part of the network review process beginning in 2019.

### Inclusiveness

While the majority of submitters generally agreed with the proposed vision for the future, there were some valid suggestions that it does not effectively cater for the vulnerable groups in society such as the elderly and those with disabilities.

The panel recommends the vision is amended to reflect the need for public transport to be inclusive of all members of the community.

The proposed new vision is:

Public transport is innovative and inclusive and sits at the heart of a transport network that supports a healthy, 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.

### Bus priority

Submitters told us they want a greater commitment from the responsible agencies on the delivery of bus priority measures, noting that increasing bus frequency may not deliver a better public transport service if they are caught in congested traffic.

Supporting infrastructure and bus priority have been included in the draft Plan, and partner agencies are committed to providing bus priority to ensure public transport functions effectively as the system grows.

### Central city shuttle

The commitment in the draft Plan to restore a central city shuttle route in the CBD received considerable support in the submissions. There were many different thoughts on how this should be funded and the types of vehicles that should be used.

The Central City Shuttle Business Case will be referred back to the Joint Committee for further investigation, including analysis on funding and route.

### Zero-emission vehicles

There was strong agreement from submitters on introducing zero-emission vehicles to the public transport fleet. In fact, many suggested the draft Plan's proposed timeframe of transitioning to zero-emission vehicles is not quick enough.

The panel endorses an 'as fast as practicable' approach to rolling out zero-emission vehicles, taking into consideration limitations around funding and competing considerations. It also notes that the Plan's focus on achieving higher patronage, encouraging more people out of single occupancy vehicles and into alternatives like public transport, will help to reduce carbon emissions and contribute to environmental outcomes.

The panel has requested that the Plan is changed to reflect stronger wording – a move to zero-emission vehicles rather than encourage – and has requested that Environment Canterbury investigate and incentivise the rollout of zero-emission vehicles as part of its procurement process.

### Fares

During consultation we heard many different thoughts on which groups are most deserving of cheaper fares such as those with disabilities, lower-income groups and families, and students/youth.

Maintaining fares at the lowest possible rate across the board is a key goal.

The fare review signalled in the draft Plan, to be undertaken within 12 months of adoption, will take a closer look at the approach to fares and concessions. The panel also recommends increasing the age for the child concession to under 19, rather than under 18, to be inclusive of secondary school students who are over 18. Fare changes are subject to annual planning processes.

### Funding

Funding impacts on the delivery of all the proposals in the draft Plan. How fast we can make this transition will depend on the rate of funding available.

If this future vision is to become a reality, we are going to need substantially more investment from the early 2020s.

The relationship with central government is important to deliver this, and local ratepayer contributions are also vital to provide an improved and better used public transport system.

## APPENDIX D. Legal advice on hearings process

## MEMORANDUM

**Date:** 4 February 2019

**To:** Hearings Panel on Our Space 2018-2048: Greater Christchurch Settlement Pattern Update

**From:** Michelle Mehlhopt, Senior Associate

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### SUBMISSIONS LODGED BY CHRISTCHURCH CITY COUNCIL AND CANTERBURY DISTRICT HEALTH BOARD

1. Christchurch City Council (**CCC**) and Canterbury District Health Board (**CDHB**) have lodged submissions on the draft Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (**Our Space**).
2. We have been asked to advise on the appropriateness or otherwise of Councillor Templeton (**CCC representative**) and Ta Mark Solomon (**CDHB representative**) being members of the Hearings Panel and deliberating upon matters addressed in the respective submissions.

### Executive Summary

3. We have considered whether the CCC and CDHB representatives are free from conflicts and can be perceived as being impartial decision makers.
4. In our view, the circumstances do not give rise to any conflicts of interest, including apparent bias or predetermination and therefore the CCC and CDHB representatives can be perceived as impartial decision makers.
5. We understand that the CCC and CDHB representatives have not been involved in the preparation or subsequent approval of the CCC and CDHB submissions, therefore there is a degree of separation between the CCC and CDHB representatives and the submissions.
6. We are also not aware of the representatives having any personal interest in the final form of the Our Space document. Further, given the high level nature of Our Space, it will not affect the rights of any one individual. On that basis, we do not consider that the CCC and CDHB representatives, or any Panel Members, would be the judge of their own case.
7. As an elected member of CCC and Deputy Chair of the CDHB, Councillor Templeton and Ta Mark Solomon respectively, will hold certain views. Those views may reflect the views of the CCC and CDHB, or they may differ. Likewise, the other Panel Members will come to the hearing holding certain views. As the Courts have recognised, it is natural for elected members to bring their own knowledge and views to decision-making. This, in itself, does not give rise to apparent bias or predetermination. The key is that the Panel Members retain an open mind and are not irretrievably committed to a particular position during the hearing process.
8. The Panel is made up of seven members, therefore any recommendations by the Hearings Panel will be collective recommendations, not the recommendations of any one individual Panel Member.
9. On the basis of the above, we consider it appropriate for the CCC and CDHB representatives to remain members of the Hearings Panel and that it is not necessary for them to abstain from deliberating upon matters addressed in the submissions by the CCC and CDHB.

## Potential conflicts of interest

10. Consultation on Our Space is being undertaken under Part 6 of the Local Government Act 2002 (**LGA**). Section 82 requires that when consultation is undertaken, the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making the decision, due consideration. An open mind does not mean without predisposition but prepared, despite predisposition, honestly to consider whether to change its mind.<sup>1</sup>
11. The key issue associated with CCC and CDHB representatives being members of the Hearings Panel in circumstances where the CCC and CDHB have lodged submissions, is whether the Hearings Panel is free of conflicts, including non-financial ones such as apparent bias or predetermination.
12. We address the law on apparent bias and predetermination below.

### *Law on apparent bias and predetermination*

13. Apparent bias is concerned with public perceptions as to impartial decision-making while predetermination is concerned with “closed mind” decision-making.<sup>2</sup> Related to this is the well-established principle that a person should not be the judge of their own case. That is, a decision-maker should not have an interest in the outcome.
14. The judicial test as to apparent bias involves considering whether a fair minded, impartial and properly informed lay observer would reasonably consider that the judge might not be able to decide an issue impartially.<sup>3</sup>
15. However, context is important in determining where the dividing line is between permissible and impermissible partiality. Members of the judiciary are held to a higher standard than local authorities and traditionally the Courts have taken a stricter approach to regulatory decisions as opposed to decisions on high level policy matters.
16. As set out in the recent decision of *Save Chamberlain Park Incorporated v Auckland Council*:<sup>4</sup>

The significance of the conceptual distinction between predetermination and the apprehension of bias lies in the fact that administrative decision-makers, unlike judicial decision-makers, will often, quite rightly, be influenced, formally or informally, in their decision by policy considerations. They will naturally approach their task with a legitimate predisposition to decide in accordance with their previously articulated views of policies. The fair-minded observer knows this, appreciates that there is no question of personal interest, and does not apprehend bias where there is simply a predisposition to decide one way rather than the other in accordance with previous policies. But where the question is whether the decision-maker has closed his mind and slipped from predisposition to predetermination it seems unnecessarily complicat[ed] to involve the fair-minded lay observer.

17. In the context of predetermination in local authority decision-making, Duffy J put it this way:<sup>5</sup>

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<sup>1</sup> *Friends of the Turitea Reserve Society Inc v Palmerston North City Council* [2008] 2 NZLR 661 (HC) at [102]; *Save Chamberlain Park Incorporated v Auckland Council* [2018] NZHC 1462 at [179].

<sup>2</sup> *Save Chamberlain Park Incorporated v Auckland Council* [2018] NZHC 1462 at [180].

<sup>3</sup> *Muir v Commissioner of Inland Revenue* [2007] NZCA 334, [2007] 3 NZLR 495 at [62]; *Saxmere Company Ltd v Wool Board Disestablishment Company Limited* [2009] NZSC 72, [2010] 1 NZLR 35.

<sup>4</sup> *Save Chamberlain Park Incorporated v Auckland Council* [2018] NZHC 1462 at [180] citing HWR Wade and CF Forsyth *Administrative Law* 911<sup>th</sup> ed, Oxford University Press, Oxford, 2014) at 394.

<sup>5</sup> *Whakatane District Council v Bay of Plenty Regional Council* [2009] 3 NZLR 799 (HC) at [117]; *Save Chamberlain Park Incorporated v Auckland Council* at [177].

There is nothing objectionable about councillors holding preliminary or “in principle” views on decisions, provided when it comes to making the actual decision, they do so with an open mind to other alternatives. Indeed it is always likely to be the case that members of local authorities will hold particular views on certain issues. The effect of local body democracy is that persons are voted into office holding certain views. What is important is that when they come to make decisions they follow a thought process that recognises a change of mind may eventuate.

18. As Philip Joseph has observed:<sup>6</sup>

Some decision-makers, such as ministers of the Crown, local authorities or planning bodies, routinely announce policy preferences and approach their decision-making so as to promote their policies. Their decisions remain unimpeachable, provided they retain an open mind, are amendable to persuasion and do not commit to a particular outcome in individual cases.

19. The above case law draws a distinction between administrative decision-makers and judicial decision-makers. For example, an elected councillor appointed to a hearings panel should not be held to the same standard as the judiciary. It is permissible for Panel Members to hold certain views, as long as they retain an open mind and are not irretrievably committed to a particular position during the hearing process.

#### *Analysis*

20. The circumstances of this case are important to determining whether the CCC and CDHB representatives can be perceived as being impartial decision-makers.

21. We understand that the CCC and CDHB representatives have not been involved in the preparation or subsequent approval of the CCC and CDHB submissions. In particular, the CCC submission has been lodged under delegated authority and has not been the subject of a council resolution. Therefore, there is a degree of separation between the CCC and CDHB representatives and the submissions.

22. As far as we are aware, the CCC and CDHB representatives have no personal interest in the final form of the Our Space document. Further, the outcome of the hearing will not affect the rights of any one individual. Rather, Our Space is a high-level document that will impact on a wide cross-section of people in Greater Christchurch. On that basis, we do not consider that CCC and CDHB representatives, or any Panel Members for that matter, would be the judge of their own case. This is also reflected by the fact that it is relatively common for local authorities to lodge submissions on their own policy or planning documents.

23. As an elected member of CCC and Deputy Chair of the CDHB, Councillor Templeton and Ta Mark Solomon respectively, will hold certain views. Those views may reflect the views of the CCC and CDHB, or they may differ. Likewise, the other Panel Members will come to the hearing holding certain views. As the Courts have recognised, it is natural for elected members to bring their own knowledge and views to decision-making. This in itself does not give rise to apparent bias or predetermination. The key is that they approach the hearing and deliberations with

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<sup>6</sup> Philip Joseph, *Constitutional and Administrative Law in New Zealand* (4<sup>th</sup> ed, Thomson Reuters, Wellington, 2014) at [25.5.5] citing *CREEDNZ Inc v Governor-General* [1981] 1 NZLR 172 (CA) at 179; 194; *Minister of Immigration v Jia Legeng* [2001] HCA 17, (2001) 205 CLR 507 at [102], [105] and [137]; *Back Country Helicopters Ltd v Minister of Conservation* [2013] NZHC 982, [2013] NZAR 1474 at [130]-[138].

an open mind. That is, their mind is not so foreclosed that they gave no genuine consideration to the material before them.<sup>7</sup>

24. The Panel is made up of seven members with each Panel Member having one vote.<sup>8</sup> Therefore any recommendations by the Hearings Panel will be collective recommendations which are unlikely to be influenced by any one view of an individual Panel Member.
25. The Hearings Panel will make recommendations on Our Space to the Greater Christchurch Partnership Committee. Each individual local authority has an obligation under the National Policy Statement on Urban Development Capacity (**NPS-UDC**) to have a future development strategy. Therefore, the ultimate decision to adopt the future development strategy required under the NPS-UDC rests with the individual councils, not the members of the Hearings Panel.
26. On the basis of the above, we do not consider that a fair-minded lay observer would consider that the Panel Members would not be able to determine matters impartially.

### **Courses of action**

27. We consider it appropriate for the CCC and CDHB representatives to remain members of the Hearings Panel and do not consider it necessary for them to abstain from deliberating upon matters addressed in the submissions by the CCC and CDHB.
28. Prior to the hearing, each member of the Hearings Panel will need to review the list of submitters and consider whether they have any potential conflicts of interest. These may include any relationships or affiliations with submitters. We recommend that the Hearings Panel issue a Minute prior to the hearing acknowledging any potential conflicts of interest. In that Minute the Hearings Panel should address the CCC and CDHB submissions.
29. We recommend that the Minute confirm that the CCC and CDHB representatives were not involved in the preparation or subsequent approval of submissions and that they do not consider that the circumstances give rise to a conflict of interest. If any submitter takes a different view, they may raise this with the Hearings Panel.
30. In relation to the Officers' Report, we recommend that CCC and CDHB staff involved in the preparation of the CCC and CDHB submissions take no part in the preparation of the Officers' Report. We also recommend that any involvement by CCC and CDHB staff that were not involved in the preparation of the submissions be limited to matters not raised in the CCC and CDHB submissions or any other submissions raising similar matters. We understand that the Officers' Report has been prepared on this basis.

### **Wynn Williams**

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<sup>7</sup> *Franklin v Minister of Town and Country Planning* [1948] AC 87 (HL) at 103; *Save Chamberlain Park Incorporated v Auckland Council* [2018] NZHC 1462 at [178].

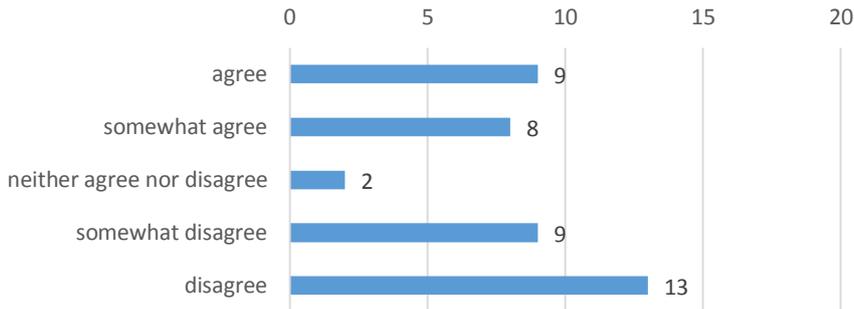
<sup>8</sup> The Terms of Reference state that all members have voting rights (except the NZTA representative).

## APPENDIX E. Analysis of submissions

### Responses to Submission Form Questions

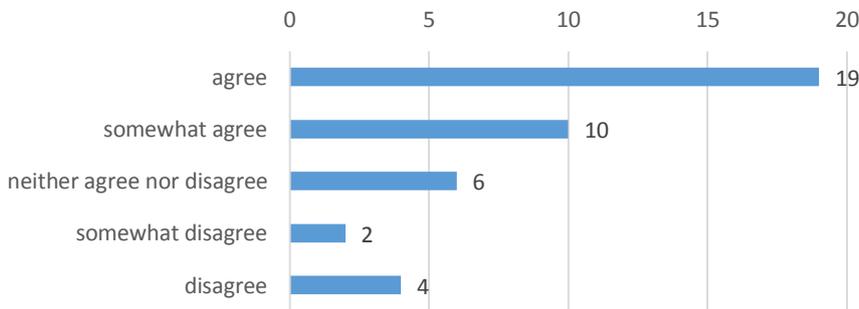
Of the 45 submitters that made a submission using the submission form, their response to whether they agreed or disagreed with the question (Questions 3 and 9 did not ask whether submitters agreed or disagreed but sought additional information) is outlined below:

**Question 1:** Our Space highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi. *Do you agree or disagree with this approach and why?*



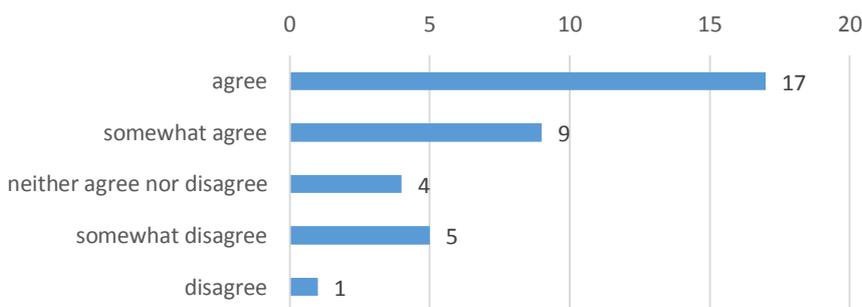
Total: 41 responses

**Question 2:** Our Space adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri. *Do you agree or disagree with this approach and why?*



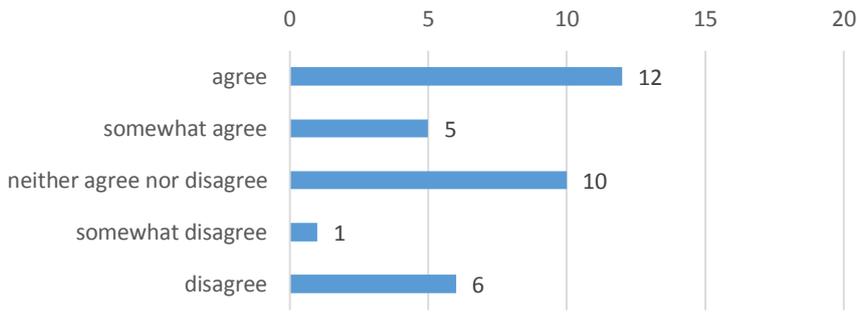
Total: 41 responses

**Question 4:** Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their viability and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri. *Do you agree or disagree with this approach and why?*



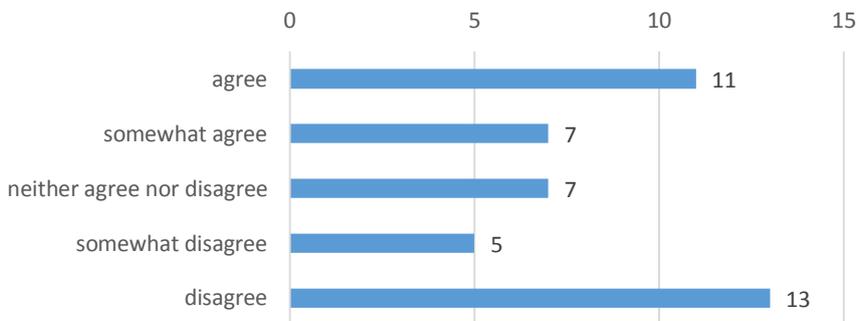
Total: 36 responses

**Question 5:** The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified sufficient capacity for new industrial businesses. *Do you agree or disagree this is sufficient and in the right location and why?*



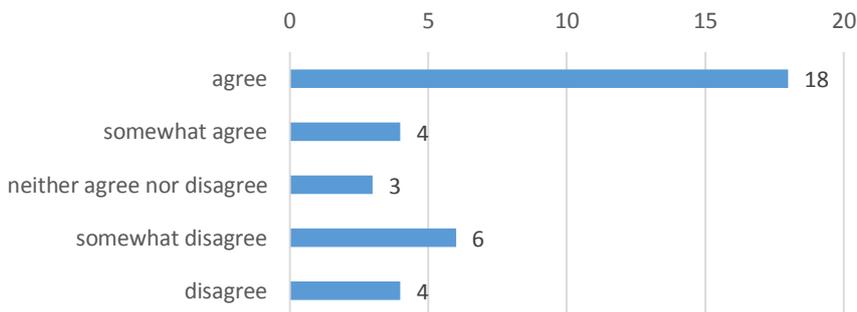
Total: 34 responses

**Question 6:** The proposals in Our Space are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy (including through business sector trends and impacts from technological change). *Do you agree or disagree with our evidence base and why?*



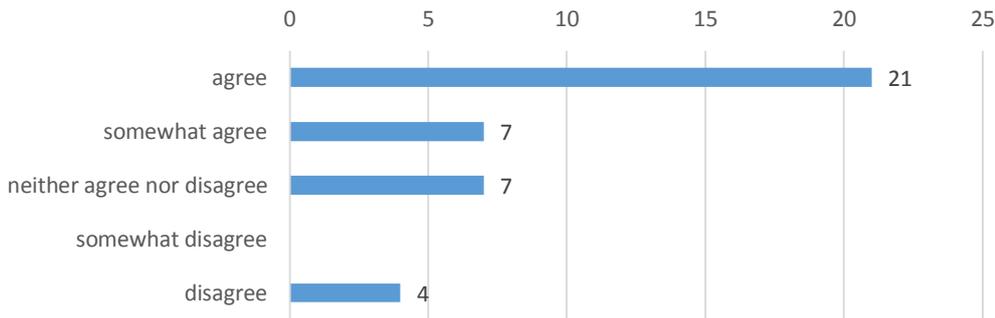
Total: 43 responses

**Question 7:** Our Space promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and an intention to deliver rapid transit along the northern and south-west transport corridors. *Do you agree or disagree with this approach and why?*



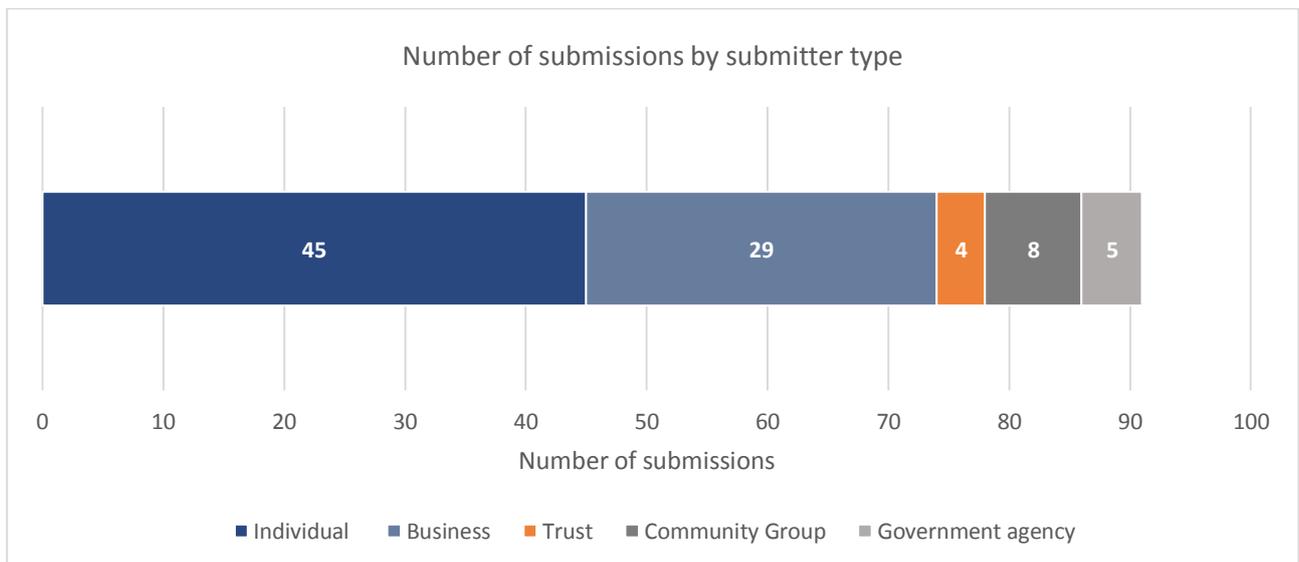
Total: 35 responses

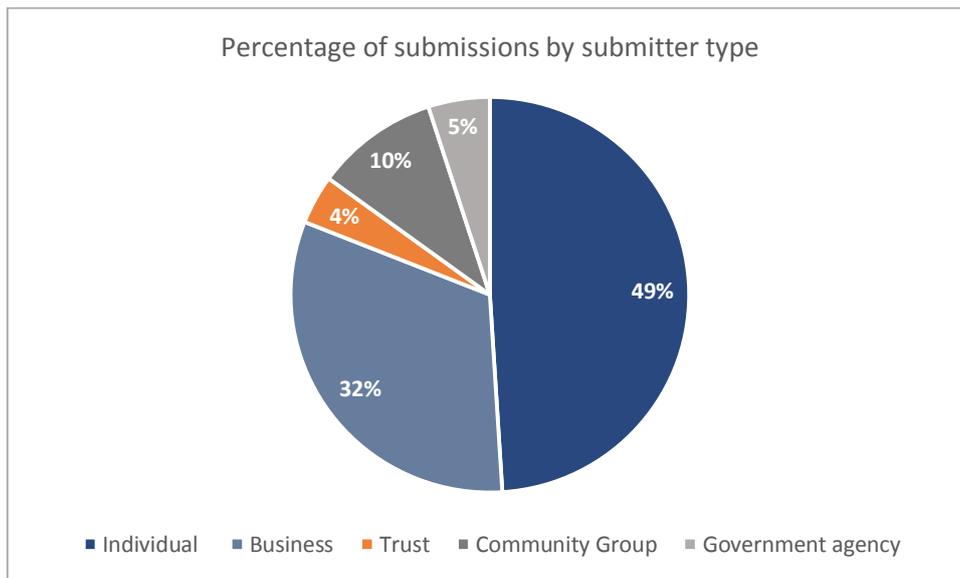
**Question 8:** Our Space aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities. *Do you agree or disagree with this approach and why?*



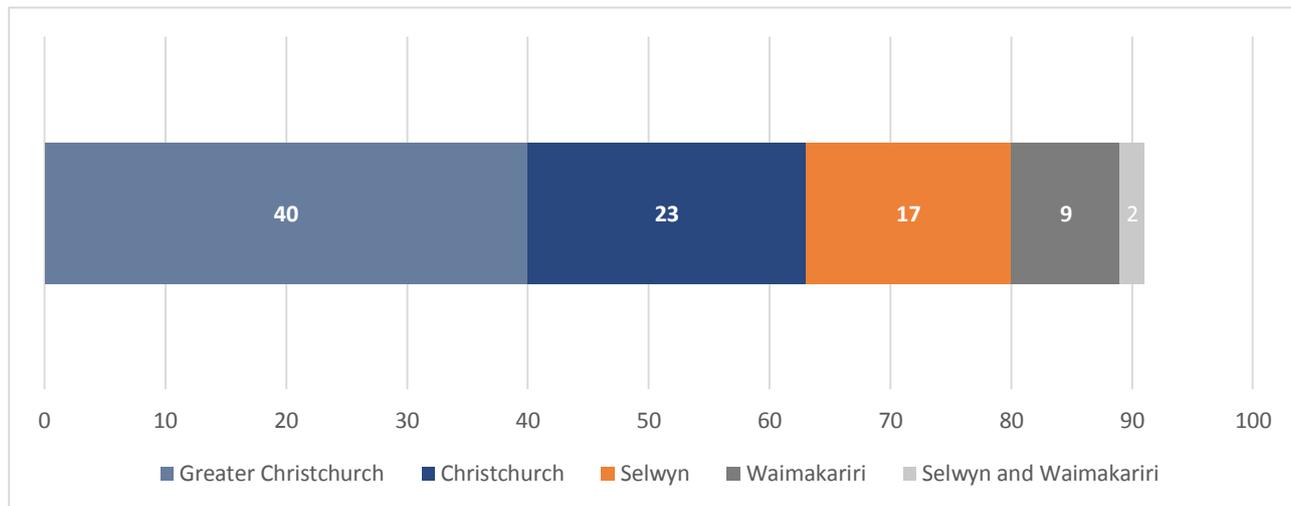
Total: 39 responses

Submissions by type of submitter

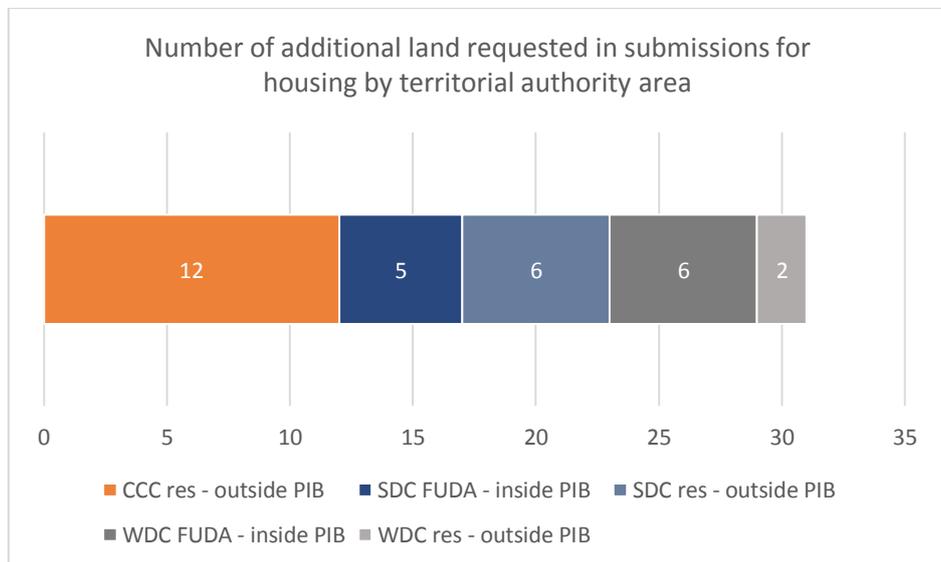
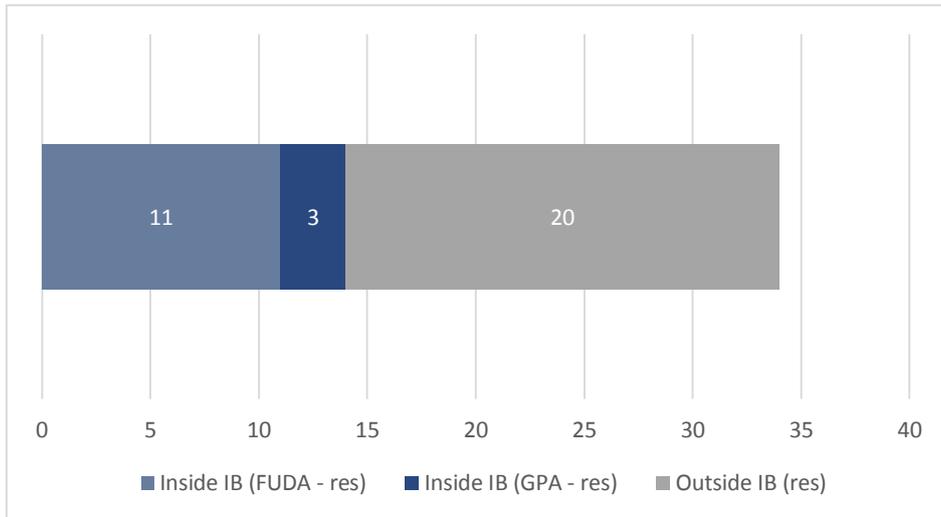




### Geographical area of focus of submissions



Additional land requested in submissions for housing by territorial authority area



## APPENDIX F. Assessment of key matters with different partner views

This Appendix outlines the merits of options outlined in the Officers' Report in relation to three issues: Densities, Sequencing and Feasibility.

Also included is work undertaken by Beca on behalf of the Partnership in liaison with partner staff to better understand partner officer views and includes a recommended approach of the consultant.

### Densities: Considering the appropriateness of higher densities in future development areas

#### Context

Concern was raised through submissions that the proposals in Our Space encourage urban sprawl.

One way to reduce the extent of urban (greenfield) expansion required to meet projected household growth to 2048 is to promote appropriate higher densities within the proposed future development areas in Selwyn and Waimakariri.

The CRPS currently specifies minimum densities for greenfield areas in Selwyn (10hh/ha) and Waimakariri (10hh/ha), as well as Christchurch City (15hh/ha).

The draft Our Space document signals that appropriate housing density requirements for the proposed future development areas in Selwyn and Waimakariri will be a consideration of the District Plan Reviews underway in those districts, due to be publicly notified in 2020.

Having regard to the matters raised in submissions, officers have identified four options for considering the appropriateness of higher densities in future development areas, for consideration by the Panel.

#### Options

The options identified for consideration by the Panel are:

- i. to provide greater direction and certainty in a final Our Space document; and/or
- ii. to provide greater direction and certainty through changes to the CRPS Chapter 6; and/or
- iii. to provide greater direction and certainty through district plan reviews; and/or
- iv. comprehensively review density provisions through the scheduled CRPS Review in 2022.

#### Relevant considerations

##### *Option i.*

Our Space could provide greater direction and certainty by proposing that future development areas should achieve a minimum density of 15hh/ha, consistent with the current requirement for greenfield areas in Christchurch City, or a density between 10hh/ha and 15hh/ha. Under this option, Our Space could also signal the changes required to embed revised density provisions in relevant planning documents (the CRPS Chapter 6 and district plans).

This option would realise any potential opportunities to maximise the development capacity of the future development areas most quickly. However, while there is anecdotal evidence that some greenfield developments in Selwyn and Waimakariri are achieving densities greater than 10hh/ha, and that subdivisions in Christchurch City have delivered 15hh/ha, there is not currently a sufficiently robust evidence base to demonstrate that a higher minimum density requirement is deliverable, or appropriate based on an associated assessment of costs and benefits. Inserting a proposed new density requirement into Our Space could also risk development being less aligned with existing master planning or structure planning already undertaken for these areas, as well as Long Term Plans and infrastructure strategies. Further, there has not

yet been any community and stakeholder consultation regarding an increase in the minimum density requirements; inserting a higher target into Our Space therefore risks undermining established collaborative approaches within local authority areas.

*Option ii.*

Higher densities in future development areas could be promulgated through a change to the minimum density requirements in CRPS Chapter 6. This option has the benefit of enabling a proper evaluation of the costs and benefits of increasing minimum densities and ensuring there is a robust evidence base to underpin a decision on an appropriate density range for these areas. There would also be an opportunity for community and stakeholder input through consultation on the proposed change. While this could usefully inform the District Plan Reviews already underway, it could also potentially delay these processes due to the time likely to be needed to develop a supporting evidence base and take forward a CRPS change. There is also less planning certainty about what these areas could deliver, when compared with Option i; as currently drafted the Action Plan does not specifically require an uplift in greenfield densities.

*Option iii.*

Option iii is to consider appropriate density requirements for future development areas through District Plan Reviews. This is the approach reflected in the draft Our Space document (Action 9, Section 6). This option has the benefit of ensuring such decisions are informed by the detailed work and community consultations associated with Selwyn and Waimakariri's District Plan Reviews. Potential disbenefits of this option are that density requirements are considered at a local, rather than sub-regional level, and there is less planning certainty over the short term about what these areas could deliver.

*Option iv.*

The final option identified is to undertake a comprehensive review of density provisions as part of the scheduled CRPS Review in 2022. This has the benefit of ensuring sufficient time for the development of a robust evidence base (including up-to-date Census data and population and household projections), the opportunity to take account of relevant new government direction, and better align land use policy with transport investment decisions. However, deferring a decision on appropriate densities for future development areas provides less planning certainty and potentially lost opportunities to deliver future housing at higher densities, if appropriate, should these areas be re-zoned on the basis of current density requirements before the CRPS review is completed and any changes to housing densities are subsequently embedded in district plans.

**Officers' Preferred option**

The authors of this report consider that to most efficiently utilise the identified future development areas, consideration should be given to increasing densities from the current 10hh/ha minimum requirement in the CRPS. Any resultant increased densities would minimise the extent of new land necessary to be zoned to meet housing demand over the period to 2048. Increased housing densities also promote a compact urban form that supports existing centres and can be served efficiently by infrastructure, can provide for greater transport choice through more affordable public transport, walking and cycling opportunities and vehicle sharing, and help to ensure housing choice, including affordable housing options.

Table 6 of the Greater Christchurch Settlement Pattern Update - Options Assessment report, published for consultation alongside the draft Our Space document and reproduced below, provides an assessment of the number of additional dwellings that could be enabled under different zoning densities for the identified future development areas.

Net Density (hh/ha)	10 hh/ha	12hh/ha	15 hh/ha
Rolleston	4,500	5,500	6,500
Kaiapoi and Rangiora	4,500	5,600	6,700

#### Specific recommendation:

That a review of density requirements is considered at a Greater Christchurch sub-regional level, and that *Our Space* and the CRPS provide appropriate strategic direction.

Include an additional action in *Our Space* (Section 6, Schedule of future work) signalling a commitment to undertake an evaluation of minimum greenfield densities.

Suggested wording for Section 6, Schedule of future work, 'Improve our tools and evidence base': *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. Lead partners: SDC, WDC, CCC, ECan. Timeframe: 2019.*

Include wording in *Our Space* to make clear that this evaluation could help inform a decision as to the appropriateness of including revised densities within the scope a proposed change to the CRPS in 2019 to allow Chapter 6 and Map A the flexibility to respond to identified need.

Suggested wording for *Our Space* Section 5.3, p 24, new fourth para: *To most efficiently utilise land within identified future development areas, consideration will also be given to appropriate residential densities. An evaluation of current minimum greenfield densities, to be undertaken in 2019, will help inform a decision as to the appropriateness of including revised densities within the scope of a proposed change to the CRPS.*

Suggested wording for *Our Space* Section 6 Action 8, new bullet point:

- *consider the appropriateness of including revised minimum densities for future development areas*

Officers do not recommend that a final *Our Space* document specifies a minimum density to be achieved in future development areas.

#### **Views held by officers in partner territorial authorities**

Waimakariri District Council
<p>WDC staff do not support the proposed course of action recommended by reporting officers for a number of reasons summarised below and offer an alternative set of recommendations to the Panel</p> <ul style="list-style-type: none"> <li>• A number of submitters in different ways express concerns about 'sprawl', and some suggest an immediate and significant (by 50%) increase in prescribed minimum densities. We share the concern to minimise the consumption of rural land to that necessary to provide for urban expansion that is signaled in the draft FDS to meet identified growth needs and prevent premature release of additional 'new' greenfield land to that necessary to comply with minimum targets; while promoting consolidation by seeking higher densities</li> <li>• The critical difference is in the proposed route to have these matters appropriately considered. That set out by officers in the report is impractical in the timeframes suggested by underestimating the scale of the work required, would impose significant additional unbudgeted costs, puts at risk the timely passage of the proposed 2019 CRPS Change that would frustrate</li> </ul>

and delay the District Plan Reviews, and is inconstant with what was clearly stated through Draft Our Space documents upon which the public were entitled to rely.

- Our proposed course of action below achieves what is necessary and is consistent with the undertaking given through Our Space. No actual evidence has been provided through submissions to warrant departing from the draft Our Space process which stated the best route for dealing with densities in prospective Waimakariri and Selwyn Future Urban Development Areas (FUDAs) was through District Plan Review processes (Options Assessment Report, November 2018).
- Investigating, assessing and establishing sufficient evidence to defend through RMA process any significant change to density is not a small undertaking. Measuring what has been recently achieved is the easy bit, but it is not then merely about putting another number in a policy document. Investigating what any significant change in densities for the long term across District towns would mean for code of urban subdivision requirements, in the context of roading, three waters and greenspace levels of service, as set through asset management plans (with effects such as greater concentration of traffic generation, increased impervious surfaces, less private/more collective greenspace, etc.), are no small undertakings.
- Similarly assessing what it means for urban form and character and obtaining and considering community views prior to any statutory process requires time and resourcing. We think it highly unlikely that our Council, and we would not recommend it, agree to make any significant changes going into statutory processes unless there has been before this undertaken pre-notification consultation with the community through proposed structure planning processes that will take the best part of 2019 to complete. This is consistent with both SDC and WDC's approach to our District Plan Reviews.
- We don't think there is proper appreciation by submitters of the reinforcing package of CRPS Chapter 6 policies that have been in play less than five years that promotes consolidation. Density is one aspect of this. Seeking to address one of these policies through an interim CRPS Change risks the policy suite unravelling on submission and appeal. It is essential that this Change is launched this year and is kept to the minimum necessary changes to Map A to enable compliance with the NPS. Going down the route of selectively changing other policies short of a comprehensive Review exercise will inevitably open up Chapter 6 to more wide-ranging challenge, delay its passage and get proposed district plans out of sync with the CRPS as we seek to comply with the NPS-UDC as the higher order document.

So we propose the following directives be incorporated as appropriate into draft FDS text:

- All partner TAs commit to by April 2020 to complete an assessment of achieved v. CRPS targeted densities in all development areas (since CRPS Chapter 6 was made operative). This assessment will also include an evaluation of the costs and benefits of increasing densities (including the implications for urban form and character of relevant towns, and infrastructure provision, as a result of increasing densities), which will be informed by community engagement as deemed appropriate by relevant TAs and circumstances. This process will allow informed consideration of the impact of a change to density regimes and is preparatory to both DPRs and the upcoming CRPS Review.
- WDC and SDC commit to incorporate increased minimum densities through FUDA structure planning processes that occur over the next 12 months, in light of the above, to be subsequently identified in DPRs that are scheduled to be notified in mid-2020.

This signals through the FDS an intention to increase minimum densities, allows the participation of all partners in the statutory RMA process of finalising those densities, does not predetermine them in the short term in the absence of the above evaluation or the structure planning, and provides for community engagement as indicated in the current draft FDS through the DPR process. It also allows for densities for FUDAs to be 'set' in 2020, gives WDC and SDC sufficient time to do the work necessary

without prejudicing their DPR programmes and does not broaden the scope and risk the timeframe for initiating and progressing the 2019 CRPS Change.

Selwyn District Council

SDC staff are comfortable with the reporting officers amendments to commit to undertaking an assessment of densities but delaying the decision on if this should be within the scope of the CRPS until such time as the evaluation has been completed. This is pitched at an appropriate level for a strategy of this nature and points to further work and considerations to be undertaken.

As a way to deliver on the amended recommendation SDC staff are supportive of the WDC staff recommendations, which outline a clear and appropriate process for this density work to be undertaken and delivered without the need to broaden the 2019 RPS scope.

## Sequencing: Providing greater certainty on sequencing of housing development

### Context

Concern was raised through submissions that the proposals in *Our Space* do not sufficiently identify how development capacity will be sequenced over the medium and long term and some submissions expressed a view with regard to the sequencing of future development areas in relation to existing Greenfield Priority Areas identified in the CRPS.

The draft *Our Space* document states that the housing targets represent the development capacity that each council will seek to enable over the medium and long term, but signals that appropriate sequencing of development will be a consideration as part of District Plan Reviews underway in those districts and due to be publicly notified in 2020.

### Options

Having regard to the matters raised in submissions, officers have identified three options for consideration by the Panel with regard to sequencing (i.e. scale, timing and location of development):

- i. retain the approach as outlined in *Our Space*, or
- ii. 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
- iii. 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).

### Relevant considerations

#### *Option i.*

Option i is to consider appropriate sequencing through District Plan Reviews. This is the approach reflected in the draft *Our Space* document. This option has the benefit of ensuring such decisions are informed by the detailed work and community consultations associated with Selwyn and Waimakariri's District Plan Reviews. Potential disbenefits of this option are that sequencing and staging approaches are considered at a local, rather than sub-regional level, and there is less planning certainty in the short term until such processes are complete. In Waimakariri, sequencing of future development areas in Rangiora and Kaiapoi through the District Plan Review to meet medium term housing targets could have varying wider implications depending on the proportion of future development areas identified in each town.

#### *Option ii.*

*Our Space* could provide greater direction and certainty regarding sequencing by:

- include amended wording in *Our Space* to more clearly direct that medium term targets represent the development capacity to be zoned or otherwise enabled by each territorial authority through district plans
- sequencing by territorial authorities shall maximise uptake of development capacity in existing urban areas and Greenfield Priority Areas to support the cohesive growth of communities, investments in public and active transport modes, and a more consolidated urban form

or, even more specifically that:

- future development areas are to be sequenced so that development capacity identified in these areas should only be zoned and supplied with the necessary development infrastructure close to the time that capacity in Greenfield Priority Areas becomes exhausted

- identify the specific staging of areas within future development areas most appropriate to meet any development capacity shortfalls to meet relevant territorial authority housing targets.

Under this option, *Our Space* could also signal that these matters would be embedded in relevant planning documents (the CRPS Chapter 6 and district plans).

This option would provide the greatest planning certainty, and potentially maximise the efficiency of infrastructure investment, of all four options. However, there is not currently a sufficiently robust evidence base to determine detailed staging of future development areas, or an associated assessment of costs and benefits. Further, there has not yet been any community and stakeholder consultation regarding such an approach; inserting this detailed staging into *Our Space* therefore risks undermining established collaborative approaches within local authority areas.

#### *Option iii.*

Greater direction could be promulgated through a change to CRPS Chapter 6. This option has the benefit of enabling a proper evaluation of the costs and benefits of and ensuring there is a robust evidence base to underpin a decision on appropriate sequencing provisions. There would also be an opportunity for community and stakeholder input through consultation on the proposed change. While this could usefully inform the District Plan Reviews already underway, it could also potentially delay these processes due to the time likely to be needed to develop a supporting evidence base and complete a CRPS change. Ensuring a CRPS Change only considers the sub-regional aspects of sequencing to provide the necessary planning certainty at a Greater Christchurch level would mitigate this risk.

#### **Officers' preferred option**

The officers' preferred position is to recommend elements of options ii and iii.

**Officers recommend including amended wording in *Our Space* (Section 3 p12) 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.**

*Amended wording for Section 3.2, paragraph 5, p12:*

*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 enable through their relevant planning processes and mechanisms (district plans, structure plans, outline development plans and infrastructure strategies) to meet the demand for housing in Greater Christchurch. Unless already enabled, additional development capacity required over the long term will only be identified in relevant plans and strategies, and the development infrastructure required to service it will be identified in each council's infrastructure strategy.*

**Include wording in *Our Space* (Section 5.5 p26 and Section 6 Action 9 p34) 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.**

*Amended wording for Section 5.5, paragraph 3, 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 6 Action 9 p34: Undertake detailed planning work (in accordance with directions outlined in CRPS Chapter 6 and the proposed change identified in Action 8) for the relevant Greater Christchurch towns in Selwyn and Waimakariri, including:*

**Include wording in *Our Space* (Section 5.5 p26 and Section 6 Action 8 p34) 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 (including consideration of provisions clarify the anticipated proportional quantum for Rangiora and Kaiapoi in Waimakariri District).**

*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.

*Wording for Section 9 Action 8 p34: Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:*

- identify areas for future growth over the medium and long term
- 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
- 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

**Officers do not recommend that *Our Space* determines the sequencing priority between future development areas and existing undeveloped greenfield areas or identifies those parts of future development areas necessary to meet medium term housing targets; this is best considered as part of detailed structure planning and infrastructure servicing to be undertaken by relevant territorial authorities.**

#### **Views held by officers in partner territorial authorities**

Waimakariri District Council
<p>WDC staff do not support the proposed course of action recommended by reporting officers for a number of reasons summarised below and consider that option 1 is the preferred option:</p> <p>Regarding sequencing, the reporting officers have failed to recognise that:</p> <ul style="list-style-type: none"> <li>• The requirement under PC5 through P11 of the National Policy Statement – Urban Development Capacity (NPS-UDC) is to include minimum targets (rather than maximum targets or limits) into both the Regional Policy Statement and District Plans.</li> <li>• At the regional level, Table 2 (of <i>Our Space</i>) identifies the housing development capacity which should be enabled rather than limiting the capacity to the Christchurch, Selwyn and Waimakariri Councils. As a comparison with other high growth councils, both Auckland Council and Bay of</li> </ul>

Plenty Regional Council have the same table (as table 2 in Our Space) already included in their Unitary Plan / Regional Policy Statement. For example, Bay of Plenty Regional Council has added the following text that identifies how the minimum targets are to be applied:

*"The National Policy Statement for Urban Development Capacity (NPS-UDC) requires minimum targets for sufficient, feasible development capacity for housing the western Bay of Plenty sub-region. The minimum targets represent development capacity for housing needed to be enabled, rather than the amount of housing built in each term. The targets will be reviewed every three years following the completion of scheduled capacity assessments.*

*These targets represent the development capacity that Tauranga City Council and Western Bay of Plenty District Council shall enable through their district plans, structure plan, growth and infrastructure strategies.*

*The NPS-UDC requires that medium-term development capacity must be feasible, zoned and either serviced with development infrastructure, or the funding for the development infrastructure required to service that development capacity must be identified in the relevant long-term plan required under the Local Government Act 2002.*

- Neither Auckland nor Bay of Plenty Regional Councils have identified these targets at the township or suburb level as recommended by reporting officers as this is a requirement for the City or District Councils to consider as part of implementing PC9 of the NPS-UDC via their District Plans.
- As stated above, this type of assessment occurs as part of structure planning and the development of infrastructure strategies and Long Term Plans. Both these tools are currently used by Selwyn and Waimakariri District Councils (Waimakariri District Council is at the early stages of developing structure plans for East and West Rangiora and East Kaiapoi).
- Any rezoning of land required to meet the medium-term capacity shortfalls (identified at the regional level) will have the opportunity to be considered as part of the Selwyn/Waimakariri District Plan Reviews. Should anyone believe that a Council has provided too much or too little land to meet the minimum targets contained at either the district or regional level, then they would be able to submit as part of the District Plan Review.

WDC staff consider that no changes are required to the FDS regarding sequencing as there is enough planning certainty provided by the following documents:

- Regional Policy Statement – existing Policy 6.3.5 and the inclusion of regional minimum targets
- Council's Long Term Plans and Infrastructure Strategies - which detail how and when development is to be "sequenced" along with funding to enable the construction of new infrastructure or upgrades to existing infrastructure. These strategies use population projections as a basis to determine when and where investment is required in their towns or City for growth purposes).

Existing Collaborative Planning process – such as the Regional Land Transport Strategy (as stated on page 26 of Our Space).

#### Selwyn District Council

SDC staff generally support the officer recommendations other than the wording in recommendation 1 and the inclusion of a draft CRPS policy in Our Space that demonstrates how Future development Areas for each town are sequenced.

With regard to the first recommendation it is SDC staffs position that this wording effectively creates maximums out of the house hold targets, which is contrary to the NPS-UDC that seeks minimum targets only be inserted in both the Regional Policy Statement and District Plans. Wording should only be

focused around planning to ensure that development capacity is enabled to meet household targets as outlined in Table 2 of Our Space.

With regard to the third recommendation (CRPS draft Policy) it is SDC staffs view that further policy intervention and direction on sequencing is not required in the CRPS, particularly to a township level. It is SDC staffs position that this recommendation is no necessary. It should be at the deamination of the Territorial Authorities to consider sequencing at a township level through structure planning and infrastructure strategies. Sequencing and release of land is already broadly enabled through the 'greenfield' priority areas, the proposed Future Urban Development Areas (FUDA's), Structure planning (and updates), District Plan Changes (responding to 3 yearly Capacity Assessments), the availability of infrastructure (infrastructure strategies and Long Term Plan), and developer uptake.

## Feasibility: Addressing feasibility for Selwyn and Waimakariri

### Context

Concern was raised in the Christchurch City Council (CCC) submission that there is 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 (p. 13) of Our Space for Selwyn. This table indicates there is sufficient capacity in Selwyn over the medium term (with a surplus capacity for 1,125 dwellings), which according to the CCC submission, means there is “little evidence for intervention via the additional zoning of greenfield land”.<sup>5</sup>

The text associated with Table 3 also highlights that the feasibility assessments undertaken for Christchurch City, Selwyn and Waimakariri produced a wide range of results, and that further work to improve modelling tools was underway.

Given the uncertainty about the assessments of feasible development capacity, and the implications for sufficiency over the medium and long term, Our Space does states that at “a 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...” (p. 13).

In this context, updated feasibility assessments were completed for Selwyn and Waimakariri 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.

To ensure alignment between the 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.

Having regard to the matters raised in the CCC submission, officers have identified three options for addressing the feasibility findings for Selwyn and Waimakariri, for consideration by the Panel.

### Options

The options identified for consideration by the Panel are:

- i to retain the feasibility findings and amend the proposals for intervention in Selwyn accordingly, or
- ii to replace the feasibility findings for Selwyn and Waimakariri with the updated assessments, or
- iii to express the feasibility findings for Selwyn and Waimakariri as a range between the two assessments.

### Relevant considerations

#### *Option i.*

The feasibility findings currently included in Our Space for Selwyn and Waimakariri are based on the assessment undertaken as part of the Capacity Assessment. This assessment was initially based on the NPS-UDC guidance and utilised the MBIE feasibility tool. However, the outputs of this modelling process were considered unreliable as they indicated that all greenfield areas are unfeasible to develop. Such a finding is inconsistent with recent development trends in the districts and contrary to the potential feasibility reported by the development sector.

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<sup>5</sup> Chapter 6 of the Canterbury Regional Policy Statement (CRPS) currently only provides for growth through to 2028 to align with the legislation that inserted this chapter as part of the Land Use Recovery Plan. A change to the CRPS as proposed in *Our Space* would seek to ensure that any capacity shortfalls in the medium term can be addressed.

After sensitivity testing and ground-truthing the model outputs, the assessment concluded that a more appropriate approach was to assess the feasibility of greenfield areas in Selwyn and Waimakariri against recent development trends and feedback from the development community. On this basis, all greenfield areas in the districts were deemed feasible.

In this context, these findings offer a more qualitative assessment of feasible development capacity by having regard for recent trends and feedback from the development sector. Conversely, this approach lacks any quantitative assessment, and in assuming all greenfield areas are feasible to develop, could be considered an 'optimistic' view of feasible development capacity over the medium and long term.

Should these findings be retained as the basis for the proposals in a final Our Space document, the need for intervention in Selwyn could be amended given the assessment indicates there is sufficient feasible development capacity to meet demand over the medium term. However, in doing so, the lack of a planning response in Selwyn would be based on an assessment that has documented deficiencies and uncertainties and may risk constraining the ability of the council to provide for future demand. This option would also not take account of the more up-to-date assessments.

#### *Option ii.*

In response to the deficiencies of the feasibility assessments undertaken for Selwyn and Waimakariri as part of the Capacity Assessment, the councils commissioned consultants to produce additional feasibility tests. The approach taken by the consultants was to develop models to assess feasible capacity.

In this context, these findings offer a more quantitative assessment of feasible development capacity, taking account actual market data to model the expected feasibility of greenfield areas in the districts. This modelling used some conservative assumptions, which according to the consultants, could mean the level of feasible capacity may be greater than indicated by the models. In contrast to Option i., these findings could therefore be considered a more 'pessimistic' view of feasible capacity over the medium and long term.

Should these findings be adopted in a final Our Space document to replace the existing feasibility findings, the proposals in Our Space related to the need for additional development capacity in Selwyn and Waimakariri would remain valid given these findings indicate a capacity shortfall in both districts over the medium term (see the table below). Adopting these findings would also reflect the most up-to-date assessments.

#### *Option iii.*

Given the range of feasibility findings for Selwyn and Waimakariri, and the uncertainties associated with all feasibility assessments, this option would express feasible housing development capacity for the districts as a range between the two assessments. Such an approach would make it explicit in a final Our Space document the uncertainties associated with feasibility, and the probable lower and upper limits of feasible capacity. This approach could also be adopted for Christchurch City to reflect different feasibility scenarios.

It may then be necessary to determine how much development capacity is assumed to be feasible within this range, in order to conclude on the sufficiency of development capacity and any necessary planning response. The range of sufficiency figures for Selwyn and Waimakariri over the medium and long term based on the two assessments is outlined in the tables below.

	Medium Term Housing Target	Sufficiency of Housing Development Capacity over the Medium Term	
		Existing Feasibility Findings (Option i.)	Updated Feasibility Findings (Option ii.)
Selwyn	8,600	+ 1,125	- 2,500
Waimakariri	6,300	- 2,100	- 1,400

	Long Term Housing Target	Sufficiency of Housing Development Capacity over the Long Term	
		Existing Feasibility Findings (Option i.)	Updated Feasibility Findings (Option ii.)
Selwyn	17,290	- 7,575	- 8,090
Waimakariri	13,360	- 9,175	- 7,260

### Rural Development Capacity

In addition to the matter outlined above relating to updated feasibility assessments, Submission 074 identified that the development capacity totals in Table 3 of Our Space did not account for rural development capacity in each district. Using historical rates of uptake only, this rural development capacity would likely equate to approximately 400-500 households for Waimakariri and 700 for Selwyn of rural capacity over the next ten years. Officers' recommendations in relation to Submission 074 are that this is also corrected in Table 3 as part of the Officers' Preferred option.

### Officers' Preferred option

The authors of this report consider that including the range of feasibility findings for Selwyn and Waimakariri in a final Our Space document, as outlined in Option iii., would be a preferred option. This should also be adopted for Christchurch City if possible to provide a consistent approach. The current proposal in Our Space to change the CRPS to enable additional development capacity in Selwyn and Waimakariri, thereby helping to address potential capacity shortfalls over the medium term, would therefore be evidenced.

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.

The authors also note the potential opportunity for any changes to district plans to address shortfalls in development capacity (i.e. through rezoning of additional greenfield land) to be informed by the next capacity assessment due in 2020. While it is recommended that the proposed change to the CRPS, as signalled in Our Space, should proceed to provide the policy mechanism to respond to any identified needs, the expected timing of the CRPS Change, the District Plan Reviews and the next capacity assessment could enable the findings of the next capacity assessment (which will include refined feasibility models) to inform any specific changes to district plans.

Specific recommendation:

Include wording in *Our Space* (Section 3.2, p. 13) that identifies 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 (a variation of Option iii.).

Insert and/or retain the adopted feasible development capacity figures in Table 3 (p. 13) and update the sufficiency figures in this table accordingly (noting the related officers' recommendation to amend Table 3 to incorporate rural development capacity for Selwyn and Waimakariri). The adopted feasible development capacity figures are based on the updated feasibility assessments for Selwyn and Waimakariri, and the existing feasibility assessment for Christchurch City that is currently reflected in *Our Space*.

Table 3: Sufficiency of housing development capacity in Greater Christchurch against Housing Targets

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity	
			Medium Term (2018 – 2028)	Long Term (2018 – 2048)
Christchurch City	59,950	55,950	+ 38,875	+ 4,000
Selwyn	9,725 - 9,900	17,290	+1,125 - 1,800	-7,575 - 7,390
Waimakariri	4,200 - 6,500	13,360	-2,100 - 1,000	-9,175 - 6,860
<b>Greater Christchurch</b>	<b>73,875 - 76,350</b>	<b>86,600</b>	<b>+37,900 - 33,875</b>	<b>-12,750 - 10,250</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.

Include wording in *Our Space* (Section 3.2, p. 13) 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.

**Views held by officers in partner territorial authorities**

Waimakariri District Council
WDC staff consider that due to the uncertain nature of the current assessment of feasibility by each of the Councils, that Table 3 should reflect a range between the existing numbers and the additional numbers determined by Market Economics for Selwyn and Waimakariri District Councils. The amended table would look as follows:

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity	
			Medium Term (2018 – 2028)	Long Term (2018 – 2048)
Christchurch City	59,950	55,950	+ 38,875	+ 4,000
Selwyn	9,725 to 9,200	17,290	+ 1,125 to - 2,500	- 7,575 to - 8,090
Waimakariri	4,200 to 6,100	13,360	- 2,100 to - 1,400	- 9,175 to - 7,260
<b>Greater Christchurch</b>	<b>73,875 to 75,250</b>	<b>86,600</b>	<b>+ 37,900 + 34,975</b>	<b>- 12,750 to - 11,350</b>

Factoring in rural capacity (Christchurch City Council submission 74)

WDC staff consider that to more accurately reflect housing shortfalls described in paragraph 1 of the sufficiency section of 'Our Space' that additional text should be included to outline that rural development capacity in each district can currently be determined by using historical rates of uptake only. This would equate to approximately 400-500 households for Waimakariri and 700 for Selwyn of rural capacity required over the next ten years.

However, even with this determination, these numbers are ambiguous, and we consider that they should not be included in Table 3 for the following reasons:

- rural demand for sections have been steadily declining over the past two to three years and is very uncertain at present
- lack of certainty around rural demand and capacity due to:
  - unavailable results from Census 2018 at the time of this assessment
  - change from Area Units to SA1 and SA2 classification by Statistics New Zealand (which has changed the geographical areas used to determine population estimates and projections) which has impacted on existing estimates/projections used in the assessment for the FDS
  - the potential impact of any policy changes identified by Councils as part of their District Plan Reviews (Selwyn and Waimakariri) – which could impact on demand over the next ten years.

For these reasons, we therefore recommend that subsequent capacity assessments are required to respond to any changes resulting from district plan reviews / and Statistics New Zealand data (Census and updated projections) re rural capacity.

#### Selwyn District Council

SDC staff have no strong preference in how feasible development capacity is expressed, other than that the additional numbers determined by Market Economics are included. A fixed number as recommended by the reporting officers in their amendments provides some perceived certainty, however there are acknowledged uncertainties in the feasibility work to date. Considering that further work is required in this space a range would also be acceptable and signal to all parties the uncertainties of the numbers. In any event it is SDC staffs expectation that a planning response to provide sufficient development capacity will be based around the lower target whether that was expressed as a standalone number or a range.

Rural Capacity - SDC staff support using rates of take up to determine rural development capacity. Using rates of take up the rural capacity required over the next 10 years would be around 700hh for Selwyn. There are uncertainties in using this methodology particularly as rural demand for sections have been

steadily declining and that we have yet to receive results from Census 2018. SDC staff recommend further work and agreement between the Territorial Authorities be undertaken to align methodologies either now or ahead of the 2020 capacity assessment.

# Our Space - 2018-2048 Greater Christchurch Settlement Pattern Update - Comments of GCP Partners

Prepared for Greater Christchurch Partnership  
Prepared by Beca Limited

15 January 2019

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## Document Acceptance

Action	Name	Signed	Date
Prepared by	<b>Paul Whyte and Mark Stevenson</b>		16/1/19
Reviewed by	<b>Mark Stevenson</b>		16/1/19
Approved by	<b>Mark Stevenson</b>		16/1/19
on behalf of	Beca Limited		

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# 1 Introduction

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The Greater Christchurch Partnership (“the partnership” or “GCP”) is undertaking a review of the strategic land use planning framework for Greater Christchurch. It has prepared “Our Space 2018-2048 Greater Christchurch Settlement Pattern Update” which outlines land use and development proposals to ensure there is sufficient development capacity for housing and business growth across Greater Christchurch to 2048.

It complements the existing Greater Christchurch Urban Development Strategy (UDS) and has been prepared to satisfy the requirement to produce a Future Development Strategy, outlined in the National Policy Statement on Urban Development Capacity - Whakahāngai O Te Hōrapa Nohoanga.

The document was collaboratively prepared for consultation, which ran from Thursday 1 November to Friday 30 November 2018. The submissions received will be heard at a Hearing scheduled for late February 2019.

The partnership asked Beca Ltd to liaise with the following partners -New Zealand Transport Agency (NZTA), Christchurch City Council (CCC), Selwyn District Council (SDC), Waimakariri District Council (WDC) and Environment Canterbury (ECan) to:

- (i) better understand the work required to complete the future work identified in Section 6.2 of “Our Space”, including a detailed breakdown with timeframes and links to other processes, and
- (ii) assist the partnership discussion on outstanding matters recognised as requiring resolution. These matters were previously identified by the partnership manager and are set out in a table identifying the issue, the positions of CCC, SDC and WDC and the partnership manager comment and recommended option.

Mark Stevenson and Paul Whyte of Beca met with officers of the above organisations to discuss responses to the above matters.

In respect of (i) above the responses are summarised in “2. Additions to Section 6.2 of Our Space” on pages 4-10 of this report. It includes further details of the actions required including agency responsible for delivery, timeframe and method by which this is achieved. There is also reference to the relevant outstanding matters (numbered 1-10) presented in Section 3 and relating to point (ii) above. Two further “Placeholder Other Actions” at the end of the table in section 3.1 are also suggested. These relate to the issue of sequencing but are not a good fit in terms of the existing schedule of actions (from section 6.2 of Our Space).

In relation to (ii) above, Beca have added an additional column to a table prepared by the Partnership manager for the GCP titled “Beca Comment following feedback from NZTA, CCC, SDC and WDC”. This records the feedback received from the partners and Beca’s comment on the original recommendation in the table. This is set out under “3. Outstanding Matters” on pages 11-16 of this report.

Accordingly, this document records the feedback received from the various parties in relation to the two matters identified above.

## 2 Additions to Section 6.2 of Our Space

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Section 6.2 Further work and implementation of “Our Space” (FDS) as published for consultation is amended by the addition of further details of the actions required to complete the “Schedule of future work” table. These additions include the following

- Action;
- Issue number from Sections that each action relates to;
- Partner responsible;
- Document/Tool and refers to the relevant outstanding issues identified previously; and
- Timeframe for delivery.

These issues are summarised as follows (For further information on each issue, refer to Section 3):

Number	Issue
1	Alter hybrid approach to targets and/or amend projections to medium
2	Sequencing of development
3	Increase densities in greenfield areas / FUDAs in Selwyn and Waimakariri Districts
4	Intensification in Townships in Selwyn and Waimakariri Districts
5	Feasibility as assessed by SDC and WDC
6	Feasibility as assessed by CCC
7	Land use inputs into transport modelling
8	Factoring in rural capacity in in Selwyn and Waimakariri Districts
9	Review business sufficiency
10	Social and affordable housing

## 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	
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	Aligned Development Agreement (ADA) with Crown to be developed further including discussions on the role of a Housing and Urban Development Authority in managing growth.	NA	All GCP partners	ADA	2018-2019
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 and investigate the most suitable locations and opportunities for new housing ownerships models (such as shared ownership, co-housing, etc). <b>Linked processes: Next Capacity Assessment, Selwyn and Waimakariri District Plan Reviews and Council's Long-Term Plans</b>		CCC, SDC, WDC	2019 - 2020	
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	SDC and WDC to investigate provisions in their District Plan Reviews to allow for smaller sites and different housing typologies to enable social and affordable housing.	10	SDC and WDC	SDC and WDC DPRs	2019-2020 Both DPRs to be publicly notified by Mid-2020
b	Use ADA as mechanism for delivery, subject to further discussions with the Crown	10	All GCP Partners	ADA	2019-2020

**IMPROVE OUR TOOLS AND EVIDENCE BASE**

3	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.  <b>Linked processes: Next Capacity Assessment and Council's Long Term Plans</b>			CCC, SDC, WDC, ECan	2019 - 2020
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	Partners to agree on the scope of a single growth model and to go to the market for a single provider for the model (incorporating all aspects including population, business and employment and transport aspects) and to agree on assumptions to enable consistent application	1, 5, 6, 8 and 9	Ecan, CCC, SDC and WDC	Single Growth Model	2019-2020
4	Review and recalibrate the Christchurch Transport Model and Christchurch Assignment and Simulation Traffic Model.  <b>Linked processes: Next Capacity Assessment and Council's Long Term Plans</b>			CCC, SDC, WDC, ECan, NZTA	2019 - 2020
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	Review of model to be completed with agreement on the land use inputs for this purpose.	7	Ecan, CCC, SDC and WDC	Transport model	2019-2020
5	Prepare a new Housing and Business Development Capacity Assessment that provides up-to-date information on current and future housing and business trends.  <b>Linked processes: National Policy Statement on Urban Development Capacity, and Selwyn and Waimakariri District Plan Reviews</b>			CCC, SDC, WDC, ECan	2020
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>

a	The revised projections based on the hybrid approach and their implications for development capacity should be documented as a technical addendum to the existing capacity assessments. The document should also include assumptions made by CCC, SDC and WDC in their capacity assessments with alternative scenarios presented to demonstrate the effect of a change in assumptions. This shall include assumptions on feasibility and demand assumed in rural areas (in Selwyn and Waimakariri), and the effect of only including demand in urban areas to demonstrate transparency and sensitivity testing.	1, 5, 6, 8 and 9	CCC, SDC, WDC	Addendum to capacity assessments	March 2019
b	SDC and WDC to draw on their evidence base for the DPRs and draft District Plans to determine capacity in the next Housing and Business Development Capacity Assessment. This shall include the capacity within existing urban areas where there are opportunities for infill and intensification.	5, 6, 8 and 9	SDC and WDC	DPRs Next Housing and Business Development Capacity Assessment	Both DPRs to be publicly notified by mid-2020 December 31 2020
c	Housing and Business Development Capacity Assessment prepared under NPS -UDC	5, 6, 8 and 9	CCC, SDC, WDC, ECan,	Housing and Business Development Capacity Assessment	December 31 2020
<b>BUILD ON OUR PLANNED DIRECTION FOR GROWTH</b>					
6	Insert relevant housing targets directly into the Canterbury Regional Policy Statement and District Plans, in accordance with NPS-UDC Policies PC5 to PC11. <b>Linked processes: adoption of Settlement Pattern Update</b>			ECan, CCC, SDC, WDC	2019
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	Insert housing targets into CRPS in accordance with Policy PC5, and insert into District Plans of CCC, SDC and WDC in accordance with Policy PC9 by way of Section 55A of the RMA. (First Schedule process not required).	NA	ECan, CCC, SDC and WDC	CRPS and District Plans of CCC, SDC and WDC	October 2019

7	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. <b>Linked processes: Council's Annual Plans and Long Term Plans</b>			CCC, SDC, WDC	2019 - 2021
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	CCC, SDC and WDC to ensure Annual Plans and Long Term Plans are aligned to the extent possible with one another in terms of infrastructure planning and delivery.	2	CCC, SDC and WDC	Annual Plans and Long Term Plans	2019
8	Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to address any need for additional housing development capacity over the medium term. <b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b>			ECan	2019
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	ECan to prepare a change to the CRPS to identify the FDAs	1-10	ECan	CRPS	Publicly notified by 1 October 2019
b	Evidence is prepared relating to capacity, densities, transport, housing market, infrastructure, natural hazards, economic and cultural matters required to inform plan change, including potential flooding at Kaiapoi, sewage disposal in Selwyn/Rakaia groundwater zone and effects on outstanding landscapes.	1-10	ECan, CCC, WDC and WDC	Section 32 document and accompanying technical reports	Publicly notified by 1 October 2019
9	Undertake detailed planning work for the relevant Greater Christchurch towns in Selwyn and Waimakariri, including: <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> <b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b>			SDC, WDC	2019 - 2023
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>

a	SDC to investigate opportunities for higher densities in Rolleston and other townships as part of the evidence base for their DPR. This is to include identification of potential options for intensification, having regard to the existing development (age, siting of buildings etc) and feasibility of redevelopment.	2, 3, 4	SDC	DPR	To be completed in time for DPR to be publicly notified mid 2020
b	WDC to investigate opportunities for higher densities in Rangiora and Kaiapoi as part of the evidence base for their DPR. This is to include identification of potential options for intensification, having regard to the existing development (age, siting of buildings etc) and feasibility of redevelopment.	2, 3, 4	WDC	DPR	To be completed in time for DPR to be publicly notified mid 2020
c	The partners evaluate the effectiveness of the minimum densities specified in the RPS including what has been achieved to date, the constraints/ issues associated with achieving the minimum target, and whether the target of 15 hh/ha can be delivered.	3	ECan, CCC, SDC and WDC	Technical report	2019
d	A review is carried out of the mechanisms to facilitating higher densities outside the District Plan and consideration is given to a programme to support delivery, including funding.	3, 4	ECan, CCC, SDC and WDC	Technical report	2019
10	Facilitate the redevelopment of existing urban areas in Christchurch City through the: <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> <b>Linked processes: Christchurch City Council's Long Term Plan</b>			CCC	2019 - 2028
	<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>
a	As per bullet points above	2	CCC	Various	2019-2028
11	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.			ECan	2022

<b>Linked processes: Selwyn and Waimakariri District Plan Reviews</b>					
<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>	
a	ECan to commence review in 2020 i.e. when funding becomes available (As per the Long Term Plan 2018-2028).	1-10	ECan	CRPS	2020-2022
PLACEHOLDER – ‘OTHER’					
<u>Actions</u>	<u>Issue</u>	<u>Partner responsible</u>	<u>Document/Tool</u>	<u>Timeframe</u>	
a	Assessment is carried out of the existing and projected traffic growth on the transport network, drawing on the outputs of modelling, to understand the impacts on the downstream network of different growth scenarios. This shall consider the extent to which the growth planned for in the townships contributes to downstream effects and the appropriateness of thresholds to align the timing of further development with network improvements.	2	GCP	Technical report	2019
b	Economic assessment is carried out of the impact of different growth scenarios, including increased employment and business activity in Rangiora, Kaiapoi and Rolleston and the effect it will have on the recovery of the Central City.	2	GCP	Technical report	2019

### 3 Outstanding Matters

#### 3.1 More significant matters or polarised positions

The columns titled Issue, CCC position, SDC/ WDC position, Partnership Manager comment and recommended option were prepared by the Partnership Manager for the Greater Christchurch Partnership with the additions by Beca being in respect of the last column titled “Beca comment following feedback from NZTA, ECan, CCC, SDC and WDC.”

	Issue	CCC position	SDC/WDC position	Partnership Manager comment and recommended option	Beca comment following feedback from NZTA, ECan, CCC, SDC and WDC.
1	<p><b>Alter hybrid approach to targets and/or amend projections to medium</b></p> <p>This refers to the “hybrid approach” adopted in which the level of growth assumed in Selwyn and Waimakariri Districts (46%) in the period from 2018-2028 is greater than the period from 2028-2048 when the proportion of growth in Selwyn and Waimakariri drops to 29%. The higher rate of growth in the short to medium term reflects continuation of a trend post-earthquake with increased growth in Christchurch City building up as the Central City recovers.</p>	Recent consents data and population estimates suggest an ability for the City to provide for a greater proportion of demand	Further reducing SDC and WDC targets is counter to projected demand in SDC and WDC and too early to rely on recent data	<ul style="list-style-type: none"> <li>Links to the next point, with SDC and WDC only planning to meet shortfalls, BUT CCC already has large capacity oversupply for the medium term so there is nothing stopping CCC exceeding its targets if demand is greater than expected (due to pull-factors rather than a constrained demand in SDC and WDC)</li> <li>If next Stats NZ projections reinforce 2018 estimates then future CAs will pick this up and targets can be adjusted if necessary</li> </ul> <p><b>Recommend: No change to current FDS approach but review at next CA and outline in MOU</b></p>	<p>CCC reiterated that recent consent data shows greater levels of intensification is occurring in Christchurch City and that the hybrid approach may be underestimating CCC’s ability to meet growth demands in the short to medium term. According to CCC, provisional population estimates show WDC not meeting the medium growth projections with SDC and CCC just meeting medium projections. A different view of the levels of growth has been conveyed by WDC (with growth beyond the medium projections). WDC noted that there has been a continuing demand as evidenced by building consent data, with between 600-700 consents in 2018 and greenfield areas such as Ravenswood reporting significant sales.</p> <p>SDC and WDC note that current population estimates do not have sufficient detail to enable a definitive response. Census results are due in 2020 (later than anticipated) which provides an opportunity to review the approach then. Accordingly, there is insufficient data to establish a trend at this point in time.</p> <p><b>Given the uncertainty with the relevant statistics particularly in establishing discernible trends, Beca considers the recommendation appears appropriate at this stage.</b></p>
2	<p><b>Sequencing of development</b></p> <p>This issue relates to increased development and growth impacting on infrastructure, particularly the transport network, and whether sequencing is signalled in the FDS with provisions included in the RPS and District Plans to manage the levels of growth in the Districts.</p>	FDS does not fully sequence development to ensure the efficient use of infrastructure, and targets are minimums so do not prevent additional capacity being provided	SDC/WDC only planning to meet shortfalls and not overprovide (linked to DRPs and LTPs) and policy wording to state maximums or sequence aka PC1 runs counter to NPS	<ul style="list-style-type: none"> <li>Links to next two points</li> <li>Uncertain how specific areas within FUDAs can be identified and sequenced if structure planning has not been completed</li> <li>If sequencing point relates to maximum target wording, then any strengthened commitment perhaps best agreed outside of formal LGA/RMA documents</li> <li>If sequencing point relates to first considering existing urban and existing GPAs and densities (next two points), then any strengthened</li> </ul>	CCC notes the potential growth that may occur could impact on infrastructure provision, particularly transport, with consequential downstream effects. CCC does not necessarily favour “PC 1 targets” with provisions considered appropriate through the RPS and District Plans to manage growth in a manner aligned with infrastructure delivery. E.g. increased growth above a limit only upon demonstrating an increase in mode share.

				<p>commitment perhaps best agreed outside of formal LGA/RMA documents</p> <ul style="list-style-type: none"> <li>Many existing undeveloped/underdeveloped GPAs already have subdivision consents so increasing densities in these areas more problematic</li> </ul> <p><b>Recommend: No Change to current FDS approach but consider further through CRPS, review at next CA and outline in MOU</b></p>	<p>SDC and WDC are generally of the view that the inclusion of “minimum figures” meets the obligations under the NPS and that sequencing in the NPS relates more to alignment with infrastructure rather than urban form. These parties and NZTA do not consider this is a major issue at present based on estimated growth and if implemented, there is a need for clear and defined thresholds with sufficient evidence/ rigour. WDC noted the potential for transport issues associated with growth within CCC rather than downstream effects from other districts.</p>
<p><b>3 Increase densities in greenfield areas and FUDAs</b></p> <p>This issue refers to the anticipated household density in greenfield areas and FUDAs in Christchurch City, Selwyn District and Waimakariri District and whether the current minimum density requirements should be altered. As context, Policy 6.3.7 of Chapter 6 to the Canterbury Regional Policy Statement specifies minimum densities for greenfield priority areas of</p> <p>a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District: and</p> <p>b. 15 household units per hectare in greenfield areas in Christchurch.</p>	<p>Minimum density requirements should be increased from 10hh/ha to 15hh/ha in SDC and WDC to be consistent with Christchurch City</p>	<p>Best considered through DPR consultations and discussions with developers rather than a forced CRPS policy</p>		<p>CCC are of the view that there should not be a distinction between greenfield areas in CCC and SDC /WDC in terms of minimum densities. It has been conveyed by CCC that higher density leads to efficiencies in terms of land and the transport network, and the retention of versatile soils. CCC considers that minimum densities need to be included in a RPS plan change in 2019 and not left to district plans.</p> <p>The lack of distinction between CCC and SDC/WDC is not necessarily accepted by SDC and WDC. It was noted that the densities achieved are in accordance with the CRPS and further work is required (structure planning) to inform minimum density targets in the RPS. It was noted by WDC that some of the developments in their district have densities greater than 10hh/ha (e.g. Ravenswood and Silverstream). SDC noted an average density of 12hh/ha in recent developments.</p> <p>ECan suggests that a review of the densities that are being achieved is undertaken to assist in determining an appropriate figure. Both SDC and WDC emphasised the need for DPR processes to provide an opportunity for community feedback on changes to density, before finalising their position.</p> <p>Beca considers that there is benefit in higher densities in greenfield areas, but a greater understanding is required of the densities achieved in greenfield areas in CCC, SDC and WDC to date and whether the target of 15 hh/ha can be delivered if defined as a minimum target. It is not appropriate without further consideration of the achievability of a higher target and necessary for the evidence base.</p>	
<p><b>4 Intensification in townships</b></p> <p>This issue refers to making provision for residential intensification within the existing built-</p>	<p>More emphasis in FDS that DPRs will upzone existing urban areas in townships</p>	<p>Best considered through DPR consultations rather than a firm commitment in the FDS</p>		<p>SDC is investigating intensification in the older part of Rolleston through the DPR. WDC has concerns that areas potentially suitable for intensification are less than 25 years old. Both SDC and WDC</p>	

	up areas of townships in Selwyn DC and Waimakariri DC townships				<p>emphasised that community feedback on intensification is required through the DPR process but that in any event, there are higher density provisions and mechanisms in their plans such as the Comprehensive Residential Development provisions.</p> <p>NZTA noted that densities in greenfield areas and Townships is more a matter for Councils. Increased densities in districts is better for PT options but an increased population potentially results in more single car movements if PT options not implemented or taken up.</p> <p><b>Beca notes that there is messaging in Our Space of delivering higher density housing and a commitment in the FDS that areas will be upzoned necessitates further evidence than exists at present. It is considered appropriate that this is considered through the DPR processes and the full review of the RPS.</b></p> <p><b>Given the above comments, the recommendation appears appropriate at this stage, but with a suggestion that further work is undertaken in respect of actual densities being achieved in the districts.</b></p>
5	<p><b>Feasibility in SDC and WDC</b></p> <p>This issue refers to the methodology and assumptions used by Selwyn and Waimakariri Districts in determining feasible development capacity in accordance with the NPS-UDC including the requirement to assess <b>current</b> feasibility in accordance with Policy PB3 (c).</p>	Concern that ME report may not be sufficiently robust evidence base to justify change (noting ME highlights that the results may significantly underplay capacity)	Future prices approach more realistic (being used in most other high growth areas despite being counter to NPS guidance)	<ul style="list-style-type: none"> <li>• Further and ongoing feasibility analysis and discussion with landowners/developers likely required to support findings that some greenfield land is unfeasible in the medium term (i.e. Lincoln)</li> <li>• Adopting current prices approach would increase reported shortfall significantly so would presumably be counterproductive to other sufficiency concerns</li> <li>• ME statement about underplaying capacity primarily relates to using conservative estimates of future price increases and the probability of contingency utilisation, with sensitivity testing approach in App B of the reports</li> <li>• The ME SDC report has reduced the <u>long term</u> feasible capacity by 500 dwellings (from 9700 in the CA to 9,200)</li> <li>• The ME WDC report has increased the <u>long term</u> feasible capacity by 1900 (from 4200 in the CA to 6100)</li> </ul> <p><b>Recommend: Including both feasibility results (assumed and ME) in final CA given current uncertainties, undertake further work, review at next CA and outline pathway for CRPS/DPRs approach in MOU</b></p>	<p>The NPS -UDC “Current feasibility” test in policy PB3(c) is generally considered by all parties to potentially distort results with a requirement to provide more land in the short term than under a “future” scenario. Accordingly, a pragmatic approach should be taken, utilising both current and future scenarios (it does not appear that MBIE will change the feasibility test in the NPA-UDC in the short term)</p> <p>Other concerns of CCC in respect of the methodologies are unlikely to be resolved and it is proposed that assumptions to the two methodologies are clearly documented with alternative scenarios to demonstrate transparency and the implications of changes in one or more assumptions. This should form part of a technical addendum to the capacity assessments.</p> <p><b>Given this, Beca considers that the recommendation appears appropriate at this stage.</b></p>

6	<p><b>Feasibility in CCC</b></p> <p>This issue refers to the methodology and assumptions used by Christchurch City in determining feasible development capacity in accordance with the NPS-UDC</p>	<p>Higher new build sales price and lower profit margin considered justified by market analysis (such evidence being required by NPS guidance)</p>	<p>Concern with methodology and feasibility findings i.e. range of price points used in determining feasibility.</p>	<ul style="list-style-type: none"> <li>Price points used are based on actual current sales prices (for new builds) as opposed to average sales prices including old stock</li> <li>Does not use future prices approach but does incorporate a 10% profit margin scenario to assess sufficiency</li> </ul> <p><b>Recommend: including the Report 3 reported feasibility ranges in the final CA summary and undertake further work, review at next CA and outline in implications for future review in MOU.</b></p>	<p>See above</p>
7	<p><b>Land use inputs into transport modelling</b></p> <p>This issue refers to the land use assumptions made in the EFM transport model and the appropriateness of those assumptions.</p>	<p>Land use inputs for business land can be derived from the shared EFM model, with councils refining appropriate distribution</p>	<p>EFM model not appropriate for use with transport modelling</p>	<ul style="list-style-type: none"> <li>Transport model v18 is an update rather than an overall, v19 is the chance for greater enhancement</li> <li>BCs need to commence modelling in January 2019, there is not enough time to achieve any Plan B, and the risks/implications of using v16 are far more significant</li> <li>Uncertain if ME are aware that councils have undertaken refined distribution (from the EFM TA totals) not relied on EFM sector projections</li> <li><b>Recommend: WDC follow SDC approach to distributing EFM totals and proceed v18 approach, outline in MOU a process to consider and resolve alternative methodologies for development of v19.</b></li> </ul>	<p>There appears to be general agreement among the parties with the approach in the recommendation.</p>

### 3.2 Less significant matters which may have more easily resolved positions:

	Issue	CCC position	SDC/WDC position	Partnership Manager comment and recommended option	Beca comment following feedback from NZTA, ECan, CCC, SDC and WDC.
8	<p><b>Factor in rural capacity</b></p> <p>This issue relates to demand and supply not being for the same geographic area in the context of Selwyn and Waimakariri Districts e.g. demand for land in urban and rural areas being reconciled with supply. which is limited to urban areas.</p>	<p>Needs to be deducted from demand (or included in capacity) to more accurately report FDS sufficiency and shortfall findings</p>	<p>Quantum uncertain due to potential for DPR to adjust rural capacity so best considered as part of DPRs</p>	<ul style="list-style-type: none"> <li>There is currently a clear discrepancy between demand (whole of UDS area) and capacity (only urban/rural res area) in the CA</li> <li>SDC/WDC DPRs might change rural subdivision rules</li> <li>Zoning capacities will continue to change and can be addressed/updated in periodic CAs so including the current capacity (linked to uptake) would better reflect current CA sufficiency and shortfall findings</li> </ul> <p><b>Recommend: including rural capacity estimate in final CA and adjust sufficiency and shortfall findings but review at next CA and outline in MOU.</b></p>	<p>This potentially is a significant issue as CCC have a fundamental issue with WDC not reconciling demand and supply for the same geographic area. SDC is undertaking analysis now based on demand and supply in rural areas being excluded. WDC considers that some of the demand for housing in rural areas may occur in the townships but that a definitive position cannot be taken until a review of rural subdivision and development provisions is carried out. This has regard to the potential for the minimum lot size in rural areas to be increased, reducing the potential for subdivision and contributing to increased demand in urban areas.</p> <p><b>Given this, Beca considers that the recommendation appears appropriate at this stage.</b></p>
9	<p><b>Review business sufficiency</b></p> <p>This issue relates to the use of the EFM model for the purpose of the capacity assessment and informing the FDS.</p>	<p>EFM re-run based on hybrid targets will reduce long term business demand (and potential shortfalls) in SDC and WDC</p>	<p>Only has implications for long term so best considered through next Capacity Assessment</p>	<ul style="list-style-type: none"> <li>The CA sufficiency findings for business are currently based on projections prior to a reapportioning through housing targets set out in the Draft FDS</li> <li>Agreed revised population spreadsheet provided to ME for EFM re-run</li> </ul>	<p>WDC do not consider the EFM is the appropriate model, based on the premise that the distribution of employment growth is not dynamic.</p>

				<ul style="list-style-type: none"> <li>If these housing targets remain in the final adopted FDS the impact on business demand in the period 2028-2048 should be accounted for in the final CA and FDS</li> </ul> <p><b>Recommend: include revised employment and business sufficiency in final CA and FDS and adjust shortfall findings but review at next CA and outline in MOU.</b></p>	<p>As above, Beca considers that assumptions to the different models/ methodologies should be clearly documented with alternative scenarios to demonstrate transparency and the implications of changes in one or more assumptions. This should form part of a technical addendum to the capacity assessments.</p>
10	<p><b>Social and affordable housing</b></p> <p>This issue relates to the provision of further social and affordable housing in SDC and WDC.</p>	<p>Changes to existing planning provisions sought in order to address insufficient capacity at low to middle price points</p>	<p>Action Plan allows for all potential options to be considered through appropriate processes</p>	<ul style="list-style-type: none"> <li>Uncertain what planning provision (aside from densities) would address middle price points but housing action plan enables further discussions</li> </ul> <p><b>Recommend: No change to current FDS approach but review at next CA and outline options for DRP consideration in MOU.</b></p>	<p>CCC seeks a greater commitment in SDC and WDC particularly in terms of smaller lot sizes and developments.</p> <p>SDC is investigating provisions in their DPR to allow for smaller sites and different housing typologies to enable affordable housing.</p> <p>A political decision has been made by SDC to not provide social housing but rather, to facilitate its development. Special Housing Areas (SHAs) in SDC (Rolleston) include provision for 10% affordable housing.</p> <p>WDC notes that the DP provisions can have some influence, but other factors are also important. For example, the Comprehensive Residential Development (CRD) provisions in the DP have been used by HNZ. Examples were given of developments, including Silverstream and Ravenswood, which are meeting lower price points with median \$458,000 land and house packages.</p> <p><b>Given the DPR is underway for both SDC and WDC, Beca considers that the recommendation appears appropriate.</b></p> <p><b>Consideration should also be given to an assessment of the effect of not identifying additional greenfield areas in the City on</b></p> <ul style="list-style-type: none"> <li><b>i. demand for higher density housing</b></li> <li><b>ii. demand for larger lots in Selwyn and Waimakariri based on the availability of greenfield land in the City.</b></li> </ul>