

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: David **Last name:** Hawke

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Halswell Residents Association

Your role in the organisation and the number of people your organisation represents:

Secretary

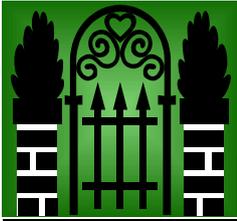
Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
HRA Greater CHC Spatial Plan submission



Halswell
RESIDENTS ASSOCIATION (inc)

The Chairman:



Submission: Draft Greater Christchurch Spatial Plan

Date: 21 July 2023

Standing: Halswell Residents Association (Inc.) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of 9 members, and we hold monthly meetings open to the public. For submissions such as this, a draft is circulated to our committee and consensus obtained before the final version is submitted and minuted at the next monthly meeting.

The Association Chairperson is John Bennett; David Hawke is Secretary; Adele Geradts is Treasurer. The Association can be contacted by email at



Introductory comments

- Our Submission focuses on part of the Draft Plan that directly affects Halswell, particularly transport - related.
- One of 8 key themes listed in the Draft Plan from Huihui Mai Engagement process was: “To use their cars less, people want more frequent, more reliable and more direct public transport” (p 6). We totally agree.
- In our view, the key statement in the Draft Plan is: “Focus growth through targeted intensification in urban and town centres and along public transport corridors”. Then “Opportunities 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities
 - 6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility;
 - 6.2 Significantly improve public transport connections between key centres;
 - 6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga;
 - 6.4 Develop innovative measures to encourage people to change their travel behaviours;
 - 6.5 Maintain and protect connected freight network.”

Our detailed response

1. We totally agree with the Key Theme around frequent, reliable and direct public transport. Unfortunately, in the Halswell area there is a very long way to go before these attributes are realised and the Draft Plan fails to take this into account.

- a. Our surveys tell us:
 - i. The primary destination for Halswell PT users is along Halswell Road, Lincoln Road to Christchurch Hospital and the central city.
 - ii. Both potential and existing bus users do not like changing buses part way through their journey.
 - iii. 32% of people in Halswell do not have a bus stop within easy walking distance.
 - iv. 54% would not feel happy sending an 8 or 80 year old off to the nearest bus stop unaccompanied.
 - v. 26% have “complex” journeys eg dropping off children to child care or to school while on the way to work.
 - b. Due to recent greenfields development, a large part of Halswell running south and west from Sutherlands Road to Country Palms has no bus service. The exception is the #100 bus that runs to Riccarton from Halswell School.
 - i. Despite this enormous gap in coverage, ECAN has decided not to review bus routes in Halswell for the foreseeable future.
2. Proposal for a “Core PT route” along Halswell Road to North Halswell then to Hornby
- a. Unfortunately, we do not see how this “Core PT route” could be realised without severely disrupting PT from Halswell toward the central city.
 - i. Waka Kotahi is about to start construction of a PT priority and separated bike infrastructure along SH 75 north of Dunbars Road. This project will start (this year) with signalling the Aidanfield Drive – SH 75 intersection.
 - ii. Buses travelling toward the central city from Halswell would need to link across SH 75 (via a right turn) into North Halswell to allow passengers to get on the bus to Hornby. These city-bound buses would then need to turn right (again) to re-join SH 75. None of the detailed designs we have seen show buses being taken into North Halswell, yet this is what would need to happen if the map in the Draft Plan is to actually happen.
 - iii. The only way we can see this working is for SH 75 to be re-routed through North Halswell, but this seems unlikely for all sorts of reasons.
 - b. The South West Area Plan (2009) envisaged a PT interchange of some sort at North Halswell.
 - i. This PT interchange takes on new significance given the deficiencies in PT coverage in Halswell, and seems to be part of the Draft Spatial Plan.
 - ii. This PT interchange must not require city-bound bus passengers from Halswell to change buses. A good model is the Christchurch Hospital “super stop”, rather than the central city exchange.
 - iii. However, if it can be built without disrupting PT from Halswell, the PT interchange may provide an opportunity for presently uncatered-for Halswell residents if “park and ride” options are provided at the PT interchange. The difficulty here is that land will need to be set aside for this purpose. It is up to Greater Christchurch Partnership to ensure that this provision is made, and the final version of the Spatial Plan would be a good place to do it.
 - iv. The PT interchange will also provide an opportunity if secure, covered bike and e-scooter facilities are provided; this is the “last mile – first mile” principle.
3. The Draft Greater Christchurch Spatial Plan may be too late for North Halswell.

- a. There are already two consented commercial developments, at 20 Monsaraz Boulevard and 201 Halswell Road respectively.
 - b. Unless the “Urban Growth Partners” get a move on, there will be no land available for a PT interchange, no land for supporting park and ride, and the Core PT route from the central city to Hornby via North Halswell will not work.
4. The “Urban Growth Partners”.
- a. Our experience is that the Greater Christchurch Partnership is an evasion in responsibility by the various partners. Two examples:
 - i. The inaction by Christchurch City Council in purchasing or otherwise allocating land for “park and ride” from the existing part of Halswell.
 - ii. The refusal by ECAN to conduct a PT route review for Halswell; or, alternatively, the willingness of Christchurch City Council to issue subdivision consents for areas that will not be serviced by PT.

Requested changes to the Draft Plan

1. Name the “Urban Growth Partner” responsible for each Direction, Action or Initiative. This applies throughout the Draft Plan.
2. Specify a location for a PT interchange for North Halswell, with supporting park and ride, and covered and secure bike and scooter storage. These details need to include access to and from SH 75.
3. Additions to the “Directions” on p 85:
 - a. Direction 6.1 (p 85): add reference to connecting active forms of transport to PT hubs via the “last mile – first mile” principle.
 - b. Direction 6.1 (p 85): add reference to the needs of the young and the old, via the “8 – 80 city” principle.
 - c. Direction 6.1 (p 85): add reference to gendered perceptions of safety around active transport, bus stops, and PT.
 - d. Direction 6.4 (p 85): add reference to the need to cater for folk with complex journeys, noting that many of these people will be women.
 - e. Direction 6.4 (p 85): add reference to purchase of land for park and ride at PT hubs and interchanges.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: Chris **Last name:** Ford

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Disabled Persons Assembly (NZ) Inc

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
DPACCCDraftSpatialPlanSubmissionfinal



Disabled Persons Assembly NZ

July 2023

To Greater Christchurch Partnership

Please find attached DPA's submission on the Greater Christchurch Draft Spatial Plan

For any further inquiries, please contact:

Chris Ford

Kaituhotuho Kaupapa Here ā Rohe - Regional Policy Advisor (Local Government)



Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and [Te Tiriti o Waitangi](#) as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the [Social Model of Disability](#) as the guiding principle for interpreting disability and impairment;
- the [United Nations Convention on the Rights of Persons with Disabilities](#) as the basis for disabled people's relationship with the State;
- the [New Zealand Disability Strategy](#) as Government agencies' guide on disability issues; and
- the [Enabling Good Lives Principles](#), [Whāia Te Ao Mārama: Māori Disability Action Plan](#), and [Faiva Ora: National Pasifika Disability Disability Plan](#) as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

- **Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.
- **Information and advice:** informing and advising on policies impacting on the lives of disabled people.
- **Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.
- **Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),¹ a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

Article 3 – General principles

Article 9 – Accessibility

Article 19 – Living independently and being included in the community

Article 20 – Personal mobility

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy² to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

Outcome 5 – Accessibility

The Submission

DPA welcomes this opportunity to engage on the Draft Spatial Plan being proposed by the Greater Christchurch Partnership collaboration.

DPA sees this spatial plan as presenting an opportunity to plan for the growth of Ōtautahi/Christchurch which is facing huge challenges due to being the largest city in the South Island and with significant population growth projected to continue.

For disabled people, accessibility is not just seen as an add on but an essential and central component of planning for Christchurch's growth over the next 30 years.

According to the 2013 Statistics New Zealand Disability Survey one in four New Zealanders have a disability or long-term health condition. Māori and Pacific peoples have an even higher-than-average rate of disability.¹

The number of disabled people in Christchurch's population is projected to increase over the next few years due to the high incidence of ageing within the population, amongst other factors.

Given the 2013 Disability Survey's figures and factoring in the draft plan's projections of a 700,000 – 1 million population for Greater Christchurch by 2051, this could mean that there could be anywhere between 140,000 and 200,000 disabled people living within the region by that time.

DPA believes that bearing those statistics in mind, building an inclusive Christchurch where everyone, including disabled people can fully participate in their communities without barriers should be the overriding objective of the CCC in terms of this plan.

Our submission and recommendations will cover the following key opportunities contained within the proposed Spatial Plan:

- Opportunity 2: Reducing hazards and risks so that people and communities are resilient to the impact of natural hazards and climate change.

¹ Statistics New Zealand. (2013). New Zealand Disability Survey. Retrieved from http://archive.stats.govt.nz/browse_for_stats/health/disabilities/DisabilitySurvey_HOTP2013.aspx#gsc.tab=0 5

- Opportunity 3: Protecting, restoring and enhancing the natural environment with focus on te ao Māori, enhancement of biodiversity, the connectivity between natural areas and access for people.
- Opportunity 4: Enabling diverse and affordable housing that support thriving neighbourhoods that provide for people's day-to-day needs.
- Opportunity 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.

DPA members in Christchurch contributed their views to this submission.

Below we provide some background around the main challenges facing disabled people in terms of housing, transport, climate change and infrastructure.

Background

Housing

The housing situation for disabled people is currently still dire in Christchurch as it is around the country.

For this reason, disabled people are one group who are disproportionately impacted by homelessness and poor housing. This is due to disabled people being overrepresented amongst low-income earners while also facing higher living costs due to disability. For this reason, disabled people are more likely to be renters; 2018 data from Statistics New Zealand shows that 47% of disabled people rent compared to 35% of non-disabled people.²

Disabled people are also at greater risk of homelessness due to the lack of security around ongoing tenancy and this is exacerbated by the low number of accessible houses not only in Christchurch but throughout the country.

² Statistics New Zealand. (2018). The disability gap 2018. Retrieved from <https://www.stats.govt.nz/infographics/the-disability-gap-2018/#:~:text=Home%20life-,Of%20disabled%20New%20Zealanders%20aged%2015%E2%80%9364%20years%20in%202018,percent%20of%20non%20disabled%20people.>

However, as this spatial plan looks out thirty years, we have an expectation that during this period, central government will (at some point) be persuaded to legislate for housing design standards to focus on universal design, meaning that disabled people as well as everyone else will be able to live in homes that are both accessible and usable across their natural lifespans.

As we elaborate in the body of our submission, the main challenge to housing accessibility arises from orienting spatial planning away from planning for urban sprawl towards the creation of more compact communities instead.

Transport

Provision needs to be made as part of the spatial plan to accommodate the transport needs of all disabled people and this includes for those who transport themselves via different modes including driving, bussing, walking, cycling, taxis and trains.

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled 'Transport experiences of disabled people in Aotearoa New Zealand'.³

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people's main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the disablist attitudes of some transport planners.⁴

Disabled people also have ongoing issues with accessing buses and mobility taxis in Christchurch (as well as throughout the country) which raises the need for improved transport accessibility and affordability⁵, including for disabled people, as being key to the success of all urban planning efforts going forward.

³ Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from <https://www.nzta.govt.nz/resources/research/reports/690>

⁴ Kelly-Costello, A. (2023, June 30). Putting a blind-friendly transport system on the agenda. Blind Citizens New Zealand. <https://abcnz.org.nz/uncategorized/putting-a-blind-friendly-transport-system-on-the-political-agenda/>

⁵ Hatton, E. (2023, May 2). Mobility fears as taxi industry warns of worker shortage. *Newsroom*. <https://www.newsroom.co.nz/mobility-fears-as-taxi-industry-warns-of-worker-shortage>

Climate change

The disabled community are already being severely hit by the impacts of climate change and are expected to be one of the hardest hit population groups going forward, locally, nationally and internationally.⁶

DPA welcomes the focus on avoiding hazards, especially those which are climate related, as part of this plan. Due to the Canterbury earthquakes a decade ago, much of the city has already been assessed for natural and geological hazards and this has made Greater Christchurch one of the first areas in New Zealand to undergo this process.

The combined impacts of climate change and sea level rise could mean that mitigation measures and/or managed retreat is a possibility in coastal areas of Greater Christchurch including in eastern parts of the city like New Brighton and in areas where there is an increased flooding risk.

The fact that certain areas will be deemed unsuitable for house building and settlement activity or even face managed retreat means that disabled people (especially those living in these areas) need to be fully involved in discussions about this issue.

However, compared with other centres, Christchurch has the advantage of being an almost entirely flat city, which is of considerable value to many disabled people, especially people with mobility impairments who use wheelchairs and other mobility devices.

This means that re-settlement issues may present comparatively less of a challenge in Christchurch than in other centres, but housing affordability is still a central concern for disabled people.

Infrastructure

DPA believes that accessible community infrastructure needs to be put in place across the board.

⁶ Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from <https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report.>

For disabled people, this includes infrastructure such as footpaths, roads, parks, rail, bus and ferry services, all of which will support both existing and new communities across Greater Christchurch.

We talk further in this submission about the need to have all infrastructure designed and built to universal design standards.

The Draft Greater Christchurch Spatial Plan and Disabled People: Challenges and Opportunities

Opportunity 2: Reducing hazards and risks so that people and communities are resilient to the impact of natural hazards and climate change.

DPA acknowledges the need to manage development around the threats posed by climate change and significant natural hazards including (in Christchurch's case) earthquake faults.

DPA supports the proposition that known areas which present a natural hazard risk due to natural and climatic risks should be re-assessed to see whether future development is viable.

DPA is also supportive of the idea that where development has already been approved (or undertaken) in potentially vulnerable, high-risk areas that reviews are undertaken into appropriate actions to mitigate the risks that present from this.

We are concerned that if accessible housing is (or has been) constructed in high-risk areas, especially those prone to flooding or sea level rise, there is the potential for any units to be severely damaged or destroyed, rendering them uninhabitable, perhaps only a short time after first being moved into by disabled people; after having undergone (in many cases) a long wait for them, putting lives and wellbeing of disabled people at risk.

DPA would like to see these stressful scenarios for disabled people avoided through good, effective involvement in all aspects of development planning by local councils in the Greater Christchurch area under this strategy.

DPA believes that it is not wise or appropriate for land which is deemed to be at high risk from natural hazards including flooding and sea level rise, to have new buildings or

development on them without full consideration about how the risks to disabled people living or working in these buildings can be managed or mitigated.

Recommendation 1: that the Greater Christchurch Partnership's council stakeholders review the appropriateness of allowing new house and commercial building activity in areas deemed at high risk of flooding or sea level rise.

There is also the potential (as noted earlier) for some areas - including those highly populated by disabled people - to be impacted by managed retreat, including in parts of Eastern Christchurch. In these circumstances, many disabled and older people will need to be transitioned away from living in otherwise suitable communities to (hopefully) less risky but still accessible ones.

In the medium to long-term, this will require Greater Christchurch Partnership Stakeholders and central government to partner with disabled people and disability organisations as part of community co-design efforts to successfully plan these types of transitions.

Recommendation 2: that Greater Christchurch Partnership stakeholders partner with disabled people, tangata whaikaha/whānau hauā and disability organisations to plan any managed retreat from existing communities.

Opportunity 3: Protecting, restoring and enhancing the natural environment with focus on te ao Māori, enhancement of biodiversity, the connectivity between natural areas and access for people.

DPA believes that access for all people to the natural environment is important.

Disabled people have the right to fully access our natural spaces and places in the same way as non-disabled people do.

DPA supports the concept of establishing an enhanced blue-green network which would see an integrated approach where people could enjoy traversing from green areas through to the coast via walkways and other means.

That is why supporting natural infrastructure including walking tracks, parks and waterways need to have accessibility features incorporated into them.

An example of this would be building pedestrian-only walking tracks which can accommodate a wide range of users, including disabled people who mobilise using wheelchairs or other mobility devices and blind and low vision people by the placement of tactile strips in strategic locations.

DPA believes that infrastructure to support cycling and micro-mobility vehicle use should remain separate but parallel to pedestrian-only walking tracks to ensure the safety of both cyclists and pedestrians.

Access to natural areas should also be supported through the construction and/or upgrading of facilities to Universal Design (UD) standards including picnic grounds, camping grounds, accessible public toilets/changing areas, viewing platforms, bus stops, parks and sports fields to accommodate the widest range of users, including disabled people.

Recommendation 3: that access to Greater Christchurch’s present and future natural areas be supported through the construction and/or upgrading of facilities to Universal Design standards.

Opportunity 4: Enabling diverse and affordable housing that support thriving neighbourhoods that provide for people’s day-to-day needs.

DPA welcomes the goal of enabling diverse and affordable housing that support thriving neighbourhoods that provide for people’s day-to-day needs.

DPA believes that the need for fully accessible housing be added as a goal alongside that of the desire for it to be diverse and affordable.

Recommendation 4: that enabling accessible housing be added to the opportunity four goal to read “Enabling diverse, **accessible** and affordable housing...”

We noted earlier the estimate that there could be between 140,000 and 200,000 disabled people residing in the Greater Christchurch area by 2051.

This means that diverse housing designs which are fully accessible and built to at least Universal Design Lifemark Standard 5 should be consented throughout the Greater

Christchurch area enabling disabled people the ability to have greater choice in terms of the housing options which are available to us as a community.

Post-earthquakes, there was the expectation that more housing and public buildings in a rebuilt Christchurch would be designed and built to UD accessibility standards and that disabled people would be able to access a wider choice of homes and buildings as a result.

Disappointingly, this has not been the case in that while an increasing number of new dwellings have been constructed, not all are fully accessible to disabled people and their families/whānau especially given the high proportion of two-storey housing developments which have been built since 2011.

However, the new Spatial Plan affords the disabled community another opportunity to call for Greater Christchurch to have more accessible housing built to meet both current and future projected demand, especially given our ageing population.

We also note the Spatial Plan's call for more compact communities in some areas and the impact this will have on the housing designs which could be permitted in these areas in the form of multi-storey dwellings.

When it comes to potentially building more multi-storey housing, the Building Code and other associated legislation needs to be changed by Parliament to make the growing number of high-rise apartments and dwellings necessitated by this policy fully accessible.

This is since under the current Building Code, building owners/developers are not legally required to have accessibility features, including lifts, installed in private dwellings (i.e., houses and business premises) if they are less than three floors in height.⁸

In the absence of any changes to the Building Code for even part of the timeframe of this plan, Greater Christchurch councils will need to incentivise private, government and non-government organisations through capital contributions to build more housing and business premises to Lifemark UD standards. The use of capital contributions will also help offset any additional costs involved.

Recommendation 5: that Greater Christchurch councils incentivise the building of more compact, accessible to Lifemark UD standards houses and public buildings through capital contributions.

All communities in Christchurch should be suitable for every disabled person to live in too, and this includes people with mobility impairments, blind and low vision people, neurodiverse people (i.e., Autistic people), people with psychosocial disabilities/mental distress and Deaf/deaf communities.

Some of Greater Christchurch's growing communities, including Selwyn, Rolleston, Papanui, Rangiora and Eastern Christchurch could become real leaders in developing accessible communities where disabled people feel fully included through the ability to participate freely without barriers.

This can be achieved through having NZ Sign Language, Braille, Large Print, Easy Read/Plain English and Māori signage in public spaces/places, mobility crossings with kerb cut outs, quiet spaces where people can retreat to in busy areas (which are suitable for neurodivergent people and people experiencing mental distress), accessible bus stops, mobility parking and vehicle drop off areas, appropriate seating where people can sit and rest as well as good lighting and security features.

Building infrastructure to UD standards should support the building of accessible, inclusive communities but more detail needs to be included in the final plan as to how.

We believe that the best way to do this is to ensure that Universal Design Standards (to at least Level 5) are written into the final spatial plan so that they are understood by developers, planners and architects.

Recommendation 6: that the final Spatial Plan fully incorporate Universal Design Standards (at least to level 5) to ensure accessibility.

DPA believes in the need for councils to conduct extensive barrier free accessibility audits to determine what changes are needed as well.

Recommendation 7: that Greater Christchurch councils undertake barrier free audits to determine what changes are needed in all communities.

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

DPA supports the goal of prioritising sustainable transport choices within Greater Christchurch to support this country's climate change goals.

DPA would like to see fully accessible transport added to the opportunity six goal alongside the need to promote sustainable transport choices.

Recommendation 8: that fully accessible transport is added to the opportunity six goal as follows "Prioritise sustainable and **accessible** transport choices....".

It is important that accessibility is built into all facets of the future public transport system in Christchurch, especially as it becomes more integrated, to ensure that the growing number of disabled people are accommodated and that our disabled community can exercise greater choice in terms of transport options.

Recommendation 9: that all public transport including buses, taxis, trains and ferries be fully accessible for everyone, including disabled people.

DPA fully supports plans for carbon neutral Mass Rapid Transit (MRT) to become the key means of delivering transport to Greater Christchurch residents and visitors in the future. We also welcome plans to ensure that MRT provides links that run between suburban communities where people live and key employment areas.

The introduction of MRT will future proof Greater Christchurch's public transport network and avoid some of the problems that have plagued Auckland in terms of their transport network in recent years.

Recommendation 10: that accessible, carbon neutral Mass Rapid Transit form the basis of Greater Christchurch's future public transport network.

DPA also welcomes proposals to enable safe, attractive and connected opportunities for walking, cycling and other micromobility. This should be undertaken on the proviso that

we laid out earlier in this submission around the need for separate but parallel spaces for pedestrians and cyclists/micromobility users.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: Jane **Last name:** Walders

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Waihoru Spreydon-Cashmere-Heathcote
Community Board

Your role in the organisation and the number of people your organisation represents:

Waihoru Spreydon-Cashmere-Heathcote
Community Board Community Board Advisor

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Waihoru Spreydon-Cashmere-Heathcote Community Board Submission

21 July 2023

Engagement Team
engagement@ccc.govt.nz
Christchurch City Council
53 Hereford Street
Christchurch 8154

Beckenham Service Centre
03 941 6633
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PO Box 73027
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Submission on the Draft Greater Christchurch Spatial Plan

Role of the Board and Board Plan

The Waihoru Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to provide a submission on the Draft Greater Christchurch Spatial Plan, and thanks staff for the work done on this matter.

The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Waihoru Spreydon-Cashmere-Heathcote area.

Our Community Board Plan's vision is that Waihoru is a place where people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other. This aligns well with the aspirations for the draft Spatial Plan, which "seeks to deliver on the community aspirations for Greater Christchurch – as a place that supports the wellbeing of residents both now and for generations still to come."

The Board Plan has particular relevant priorities around growing neighbourhoods by addressing intensification, an holistic "Ki uta ki tai – from the hills to the sea" approach to the environment, a desire to see Community and Parks facilities 'fit for purpose' in a rapidly changing urban environment and a focus on safe transport choices especially active modes and public transport.

The Board agrees with the need to for an overall Greater Christchurch Spatial Plan, and supports the focus on six broad opportunities, as articulated in the draft plan.

The Board does however want to emphasise as a broad principle the need for ongoing investment in existing communities to unlock the potential these communities hold for thriving low-carbon growth.

This submission will raise specific points around brownfields development, MRT and transport in general, and Sydenham, before commenting on the six broad opportunities in general terms.

Brownfields development and need for ongoing investment in communities to unlock potential.

The Waihoru Board Area is a great place to live, and the Board welcomes the prospect of growing communities and affordable housing within easy reach by active modes and public transport of the central city, job opportunities, nature, and recreation opportunities. Investing in existing suburbs is, as the draft Plan notes, far cheaper than building greenfields. The opportunity exists to leverage the existing strengths of the historic communities of the Board area to deliver on the goals of the Plan but ongoing investment in those communities is a prerequisite to unlocking this potential.

Fundamentally there is a tension between the Plan's focus on "going up" and the fact that the infrastructure provision continues to focus on "out" in many ways – e.g., the extension of MRT to Belfast before the provision of MRT to inner areas like Sydenham, Ferry Road, or Addington.

The Board has concerns that there is currently significant 'brown fields' intensification of housing occurring in a number of the suburbs in its area; growth which appears to follow no identified growth pattern, and which does not appear to have a coordinated approach to planning for community infrastructure.

This un-planned and therefore un-structured and un-coordinated 'intensification donut' of suburbs surrounds the central city. It is where the bulk of the *current* intensification is taking place, which is completely overlooked in the spatial plan. This needs to be added as another priority focus if this is to be a truly coherent plan for the whole region.

As this 'brown-fields' intensification increases, the implications for the people residing in these areas (both existing residents and new residents) will mean:

- increased traffic congestion;
- decreased green space and tree canopy cover;
- pressure on community facilities.

This will ultimately impact the wellbeing of the people, which is of great concern to the Board. While the goal of planning around the MRT routes from Riccarton to Hornby and along Papanui Road is admirable, the reality is that for the foreseeable future it is the ring of inner suburban communities that will be both the areas of growth and the areas where meeting mode shift goals are most productive.

It is also important to note that when growth occurs in green fields areas, investment in the existing communities that connect those (generally residential) green field areas to economic centres needs to occur. This is especially true when developments lead to large increases in car traffic along key commuter routes owing to a failure to "bake in" public transport provision from day one. For instance, growth in the Halswell area has caused significant growth in traffic through Spreydon, along Lincoln Road and along Cashmere Road. The Board is also strongly of the view that simply responding to this by e.g. widening roads and encouraging further car traffic is deeply unhelpful, due to knock on effects such as induced demand, which further erodes public transport patronage.

Transport including Mass Rapid Transit

The Board supports the focus on structuring long-term development around the provision of high-quality mass rapid transit. While the Plan does not make an explicit mode commitment, the Board's view is that street running light rail with dedicated right of way is likely to be the best way to deliver high quality MRT.

The Board notes with concern the discussion on page 40 of "compromising on the dedicated priority of mass rapid transit and grade separation of mass rapid transit from other vehicles." It is the Board's view that priority of MRT and grade separation should be the priority along MRT routes as achieving transit that is time competitive with driving will be a vital aspect of the MRT capital investment delivering the desired outcomes.

It will be important that MRT is delivered in a cost-effective manner. The Board would encourage a prioritisation of rapidity of delivery over perfection. International evidence on best practice delivery should be taken into account from the planning stage, so that the eventual delivery of the routes is not overburdened with excessive disparate goals.

The Board notes that the MRT network will require a strong network of bus routes which should also be of turn-up and go frequency. In the Board area these are the Ferry Road to Sumner corridor, the Colombo St corridor, the Lincoln Road corridor, and the Orbiter route. A focus on the delivery of MRT should not take away from the urgent need to upgrade this existing infrastructure.

The Board supports the decision to chunk the delivery of the MRT network. The Board would like to note that Canberra has successfully rolled out a light rail network through the consistent delivery of often modest chunks rather than a “big bang” approach. In the Board’s view, a pipeline approach where chunks of the network are continually rolled out is ideal.

An aspirational goal for the Board would be for long term planning to look at the prospect of upgrading the core public transport routes through the Board area to MRT standard. Clearly these possibilities would need to meet robust business cases and be considered carefully. As the network develops an openness to potential extension could include:

- Connecting the Sydenham area to the CBD, Papanui and Riccarton via MRT with a relatively short extension down Colombo St, which over time could lead to a connection to the Dyers Pass intersection.
- Connecting the North Halswell centre to the CBD, Papanui and Riccarton down Lincoln Road, which could eventually reach to Halswell proper.
- A connection via Ferry Road to the bays.

Spatial Plan – Greater Sydenham

The Board is concerned that “greater Sydenham” – roughly, the area from Selwyn Street to Ensors Road – is primarily analysed as industrial land without consideration of the broader prospects for commercial and residential growth here. The Board has the following observations:

- This is an area that is likely to see a very rapid increase in demand for residential living and as there is currently good supply of industrial land in Christchurch it is likely there will be a long-term shift to residential and other commercial uses.
- Light industrial uses are important economically, but it seems likely there will be an increasing shift to boutique industrial uses and other commercial uses where the smaller floor spaces and higher costs are balanced by the proximity to the CBD and residential.
- This is an area that is incredibly well suited to mode-shift oriented development as it is within walking distance of the CBD and could be well served with public transport and provision for active modes.
- It is also an area that could potentially unlock huge opportunities for affordable housing given the underlying land values and the prospect of typologies ranging from apartments to terraced housing.

It is the Board’s view that this area should be conceived as an urban development opportunity certainly on par with the “Eastern Christchurch” area. Joined up investment in the urban form here could deliver on the Plan’s long-term goals very effectively.

This area will certainly be an economic centre on par with the projected “North Halswell” area and one that will deliver on low-carbon transport goals and affordability far more readily.

General comment on Opportunities

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

In its 2022-25 Community Board Plan, the Waihoru Spreydon-Cashmere-Heathcote Community Board identified the spiritual, ecological and historical significance of the 'green foundation' created by the geography of the Port Hills (Te Poho o Tamatea), the Ōpāwaho Heathcote River and the Ihutai Estuary, upon which the city of Christchurch sits; the great majority of which lie in the Board area. The appreciation, protection, and enhancement of this taonga is paramount to the Board; and to this end the Community Board support this focus.

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

Climate change is already impacting on areas of the Waihoru Spreydon-Cashmere-Heathcote Community Board area, particularly those adjoining the sea, Ihutai, the Ōpāwaho River and the Hills. The Board supports focusing growth away from more fragile areas and strengthening the resilience of community to natural hazards. The Board also believes that incorporating functional elements into the blue-green network can help to reduce some of the risks.

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

Alongside previous references to the Ōpāwaho Heathcote River, the Community Board is very keen to ensure there is good access to greenspace, Tree Canopy – including street trees wherever possible, and good air quality for its communities.

The concept of a blue-green network would appear to facilitate this, however the Community Board has concerns that if the neighbourhoods which are currently experiencing significant intensification are not identified as requiring priority there is no coordinated process by which this will occur.

Opportunity 4: Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs.

The Board supports the need for delivering affordable housing and for a greater mix of housing types; and especially that this capacity is well-planned for. Affordable housing will generally mean the need for an over-supply of capacity for development to ensure that the market is well-balanced. The Board supports the development of a social housing plan across the region and notes the importance long term of providing social housing opportunities in all communities not just ones with existing large stocks of social housing.

Opportunity 5: Provide space for businesses and the economy to prosper in a low carbon future.

The Community Board generally supports this focus, some of the infrastructure for which runs through Waihoru Spreydon-Cashmere-Heathcote.

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

The Community Board supports the focus on prioritising active transport, and Spreydon and Cashmere residents are well represented in the use of active and public transport, and the Community Board has paid particular attention to advocating for improving this infrastructure in its 2022-25 Community Board Plan.

The Board supports the direction of delivering thriving neighbourhoods with quality development and supporting community infrastructure.

The Board area includes parts of two major economic routes – SH76 and the Main South Line of the rail network, both of which connect Lyttelton Port to the broader road and rail networks and anchor the southern industrial arc.

Both these corridors are major economic infrastructure, but both have major effects on the residential and transport infrastructure of the Board area. The Board's view is that as far as possible use of the rail network should be encouraged, and the effects of the SH76 corridor mitigated. It is particularly important that a "Road to Zero" approach where safety is non-negotiable is built into the ongoing management of SH76 as it is not acceptable to trade-off safety.

The Board would like to speak to this submission.

Ngā mihi,



Callum Ward

Chairperson, Waihoru Spreydon-Cashmere-Heathcote Community Board

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: Patricia **Last name:** Harte

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Urban Estates Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Urban Estates Ltd SUBMISSION on DRAFT GREATER CHRISTCHURCH SPATIAL PLAN_

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: **Greater Christchurch Partnership**
huihuimai@greaterchristchurch.org.nz

1. Submitter Details

Submitters name: **Urban Estates Limited**

Address For Service:

Contact person:

Phone:

2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan).

Details of our submission on the Spatial Plan are set out below.

We confirm that we do wish to be heard in support of our submission.

2.1 Do you support the improved public transport system proposed in the draft Spatial Plan?

Partially

Reasons

We support the improvements to the public transport system in principle, but it is not clear that the delivery of the Mass Rapid Transit system (MRT) system as proposed is feasible nor affordable and have concerns that any focus on implementing the proposed MRT will come at the cost of not delivering on an improved wider public transport system for the Greater Christchurch area.

The Spatial Plan has a very strong emphasis on a MRT system. Focusing on the proposed MRT should not come at the cost of improving the existing public transport system, particularly the public transport system which does not meet the current needs of the community.

While we recognise that Opportunity 6 of the Spatial Plan seeks to '*prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities*' it is not clear how or when this will be achieved. Delivery of a satisfactory public transport system that meets the current needs of the community in the Greater Christchurch area has been a perennial issue for those agencies responsible for delivering the public transport system.

The current public transport system does not adequately serve existing urban areas with a service that meets the needs of the community and there do not appear to be any plans to improve, or even provide for public transport into recently developed urban areas, or areas which are currently being considered for rezoning for urban expansion in parts of Greater Christchurch (i.e. Halswell, Lincoln, Rangiora, and Rolleston). Given this it is difficult to see how the transformational shift in transport choice, from private motor vehicle to public transport, as articulated and envisioned by the Spatial Plan is achievable.

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

✓ No

Reasons

Encouraging and providing for future development should not be limited to areas around the “significant urban centres” and “core public transport routes” shown on Map 2. A broader approach for future development throughout Greater Christchurch is required for the reasons addressed below.

Firstly, due to the large number of additional dwellings and associated services that will be required over the next 30 or so years it is important to enable denser development throughout Greater Christchurch, subject to avoiding land which has important values or is subject to limitations such as natural hazards.

Secondly, it is not critical that people live near “significant urban centres”. These centres are places that most people go to occasionally rather than on a regular basis. The most frequent shopping is at a supermarket which is often done as part of trip to work or home and some other destination. Therefore there is no logistical reason to only encourage and provide for higher densities in these areas.

Thirdly there are real concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these areas and making this a focus of the Spatial Plan. The feasibility of achieving this is unlikely to be possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners’ reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, sheds and utilities.
- High cost of redeveloping sites which have existing buildings, structures and utilities on them, which in many cases may still have many years of viable use remaining.
- Limited number of development companies that undertake this form of development.
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn¹ and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan are questionable and will be seriously over confident.

Additional areas of concern with the proposed approach include:

- Detrimental effects on amenity effects for those areas subject to infill and intensification, and associated adverse effects on people’s well-being and lifestyle, especially in cases where intensification is carried out in an ad-hoc and piecemeal way, as seems most likely.
- The Spatial Plan does not show future growth areas beyond the 2050 timeframe (see Map 2) and relies solely on infill and development of greenfield areas currently being considered by Council plan changes and District plan reviews. This implies that all future growth to accommodate an extra 300,000

¹ Recent analysis of consent data reveals a clear and overwhelming preference for stand-alone houses in the Selwyn District, which are unlikely to change materially over the short to medium term.

population beyond the 2050 population of 700,000 will be through intensification into existing urban areas. This is at odds with Policy 1 of the NPS-UD which requires that:

Planning decisions contribute to well-functioning urban environment, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

It is also at odds with Central Government's Urban Growth Agenda which is "to improve housing affordability by removing barriers to the supply of land and infrastructure and making room for cities to grow up as well as out." This agenda clearly anticipates providing for growth both out and up, whereas this Draft Spatial Plan provides only for upward development. **Greenfield development is completely ignored in this draft Spatial Plan despite its proven role in providing for housing within Greater Christchurch.** The high number of new houses achieved in recent years by way of greenfield development has occurred for a number of reasons, the most significant of which is that large blocks of land are only available outside existing urban areas. These blocks can and have enabled a large number of new sections and houses to be efficiently created in a relatively short time frame. This has resulted in a variety of housing options being available.

The draft Natural and Built Environment Bill, and associated draft Spatial Planning Bill¹ reinforces and builds on the requirement to provide for housing choice, as set out in Clause 5 – System outcomes, of the NBE Bill:

To assist in achieving the purpose of this Act, the national planning framework and all plans must provide for the following system outcomes:

(a) ...

(b) ...

(c) well functioning urban and rural areas that are responsive to the diverse and changing needs of people and communities in a way that promotes—

(i) the use and development of land for a variety of activities, including for housing, business use, and primary production; and

(ii) the ample supply of land for development, to avoid inflated urban land prices; and

(ii) housing choice and affordability; and

(ii) an adaptable and resilient urban form with good accessibility for people and communities to social, economic, and cultural opportunities; and

A Spatial Plan that emphasises infill without regard to other housing types, and making provision for an ample supply of land would appear to be at odds with the direction of the urban growth agenda, and risks inflating urban land prices and limiting housing choice for the community.

2.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

✓ Yes

Reasons

A healthy natural environment is intrinsically linked with the wellbeing of people and places. It is important to work with nature when considering development for the future, especially in a time of increased risk from the effects of climate change induced weather events and potential sea level rise.

2.4 Do you support the concept of a Greenbelt around our urban areas?

✓ No

Reasons

The concept of a greenbelt in town planning has typically been used primarily to act as a buffer between towns, and between town and countryside with the aim of preventing urban sprawl by keeping land permanently open. We firstly comment that it is not clear from Map 2 what is the future use of land between the Green belt and Existing urban area. This is a critical area of land that may be the most practical and efficient location for growth. If the green belt includes this “no-mans land” it is of such an extent that it potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan and has the potential to lead to perverse outcomes in terms of future urban growth and development. In addition, large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan.

A policy framework that achieves the same outcomes described by the draft Spatial Plan (an area where there is a dominance of open space for nature, rural production, and recreation. A green belt can be used to provide a large, connected area of natural environment spaces and to limit urban expansion.), but which does not rely on such a blunt instrument as a green belt, will achieve better outcomes and should be sufficient to:

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

2.5 Priority Development Areas: Do you agree with the approach to focus on these areas?

✓ Partially

Reasons

In principle we support the concept of Priority Development Areas and look forward to working in partnership with the relevant Territorial Authorities and Government agencies to unlock opportunities in these areas.

However we firstly note that the authors of the Spatial Plan have chosen not to consider other housing areas and options which should also be given priority, including well-located greenfield areas.

Secondly, it is unclear what is the intended focus of the various priority development areas, over what timeframes it is to operate, and if for more intensive residential development by way of infill, the extent to which this is feasible. As noted above, while intensification of existing urban areas may appear possible, the feasibility of achieving this is often not possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, sheds and utilities.
- High cost of redeveloping sites which have existing buildings, structures and utilities on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

2.6 The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. Do you agree with the draft spatial strategy outlined above?

✓Partially

Reasons

Opportunity	Direction	Support/Oppose
1. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people's physical and spiritual connection to these places	1.1 Avoid urban development over Wāhi Tapu 1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai	Support both Directions
2. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change	2.1 Focus and incentivise growth in areas free from significant risks from natural hazards 2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards	Support both Directions but consider that the estimation of risk from climate change is overly optimistic given the timeframe of this spatial plan. Managed retreat should be discussed in detail and provided for.

<p>3. Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people</p>	<p>3.1 Avoid development in areas with significant natural values</p> <p>3.2 Prioritise the health and wellbeing of water bodies</p> <p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>Support</p> <p>Support</p> <p>Support</p> <p>Support</p> <p>Oppose in part, for the reasons set out in Section 2.4</p>
<p>4. Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs</p>	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services;</p> <p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p> <p>4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>Support</p> <p>Support in part. Amend as follows: 'Ensure <u>at least</u> sufficient ...'</p> <p>Support in part, for the reasons set out in Section 2.2 and section 2.5</p> <p>Support, for the reasons set out in Section 2.2</p> <p>Unrealistic direction as largely depends on economics and attitudes.</p>
<p>5. Provide space for businesses and the economy to prosper in a low carbon future</p>	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.</p> <p>5.2 A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets,</p>	<p>While transport links are important future for commercial and industrial uses, generally they do not need to relate to the existing centres.</p> <p>Direction is not required. The centres network is primarily commercial with some</p>

	<p>and provides people with easy access to employment and services</p>	<p>community services. There is therefore no economic reason for these centres to be “well-connected”. They should be able to establish in areas where they are most likely to be viable.</p>
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2.7 Do you have any feedback on other aspects of the Draft Spatial Plan

- The Plan recognises that it will be necessary to incentivise higher density residential living. The previous and now current Christchurch District Plan have provided for higher densities, but there has, until recently, been limited take-up. But even this recent increase in resident units has now reduced. This indicates strongly that unless there are significant incentives that the desired increase in density will not occur. It is not sufficient to enable this development. This is recognised in Direction 4.3 but no examples of this critical component for densification are provided or discussed.
- We agree that focusing growth away from hazardous locations and investing in infrastructure that reduces exposure and adapting urban areas by incorporating functional elements into the blue-green network can all help to reduce some of the risks. However we consider that it is crucial that this is accompanied by managed retreat of existing development that is vulnerable with the next 30 years.
- There are no future areas identified to enable a variety of homes that meet the needs of people in terms of type, price and location beyond 2050 due to total reliance on infill and land currently zoned through various Council Plan Reviews/processes. The Plan does not provide a sufficient justification for this approach. In particular it fails to recognise that critical role that greenfield development has had in providing affordable housing and new and vibrant communities for a wide range people. This approach should be part of the Shared Vision for the future of Greater Christchurch.

3. Hearing options

We confirm that we do wish to be heard in support of our submission.



.....

21 July 2023

Signature of person authorised to sign on behalf of submitter.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023**First name:** Roger & Jillian Rosemary **Last name:** Howard & Marshall**Your role in the organisation and the number of people your organisation represents:****Would you like to speak to your submission?** Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File

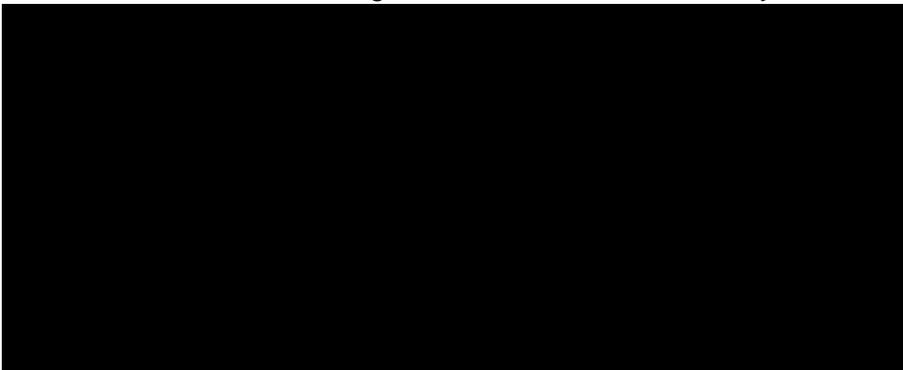
2213SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN KAY MARSHALL



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Roger Howard & Jillian Rosemary Marshall



Contact Person: Fiona Aston

Decision Requested

Include the site shown in Figure 1 within the existing urban area at West Melton on Maps 2 and 14.



Figure 1: Amendments to Maps 2 and 14.

Site shown as 

Introduction and Background

Roger Howard & Jillian Rosemary Marshall own land at 664 West Melton Road, West Melton comprising 10.4 hectares (**Figure 2**). The land is completely surrounded by residential zoned land and is identified as an Urban Growth Overlay (UGO) for Rural Residential development in the Proposed Selwyn District Plan (PSDP). The owners lodged a submission on the PSDP seeking to rezone the land General Residential and the hearings were held on 3 March 2023.

There were no submissions in opposition, and the Reporting Officer recommended accepting the submission further to information being provided on four minor site specific matters, provided at the hearing¹:

I support the rezoning of the submitters land in the PDP as it will increase the long-term plan enabled capacity shortfall by approximately 120 households to give effect to the NPS-UD. The NPS-HPL does

¹ https://www.selwyn.govt.nz/_data/assets/pdf_file/0009/1512819/s42A-Rezone-West-Melton.pdf

not apply to this site as it has been identified for future urban development by virtue of the PDP UGO. I therefore recommend that the rezoning request be accepted.

We expect that this property will be rezoned when the SDC releases its decisions in August.

The subject land has been omitted from the urban area in the Spatial Plan, Maps 2 and 14. We would expect that these Maps will be updated prior to the hearings on the Spatial Plan through the recommendations of the reporting officer.



Figure 2: Submitter site shown in red outline.

The reasons for General Residential rezoning are included in submissions on the PWDP and can be found at the following link.:

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E3%20Rezone%20%2D%20West%20Melton%2FHearing%2030%2E3%20Submitter%20Eviden>

[ce%2FDPR%2D0243%20R%20Howard%20%26%20J%20Marshall&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D](https://www.fdp.com/ce%2FDPR%2D0243%20R%20Howard%20%26%20J%20Marshall&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D)

In summary, principal reasons why the land should be included within the urban area are:

1. The land is already in an Urban Growth Overlay and we expect its re-zoning to General Residential to be confirmed in late August 2023 when decisions on the PSDP submissions are to released.
2. The development of the land promotes urban consolidation as it in effect constitutes infill development.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Equus Trust

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

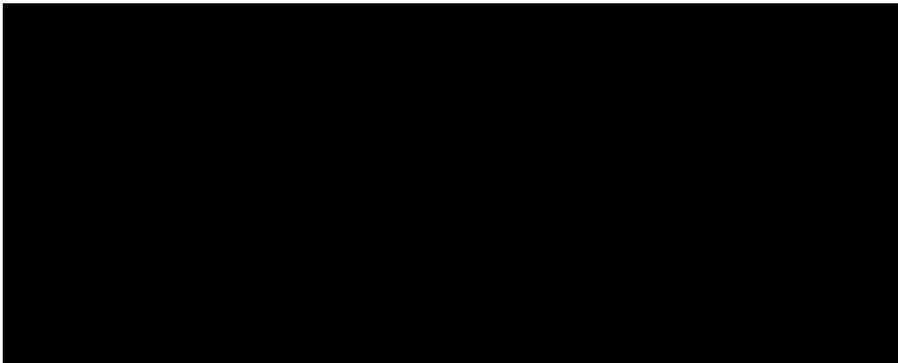
File
2267GCSpatial Plan submission - Equus Trust



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Equus Trust



Contact Person: Fiona Aston

Hearing Options

We do wish to be heard in support of our submission. If others make a similar submission, we may consider presenting a joint case with them at the hearing.

Introduction & Background

Equus Trust is the owner of 76 Hawthorden Road, which lies within but close to the current operative Christchurch International Airport 50 dBA noise contour (see Figure 1 below).

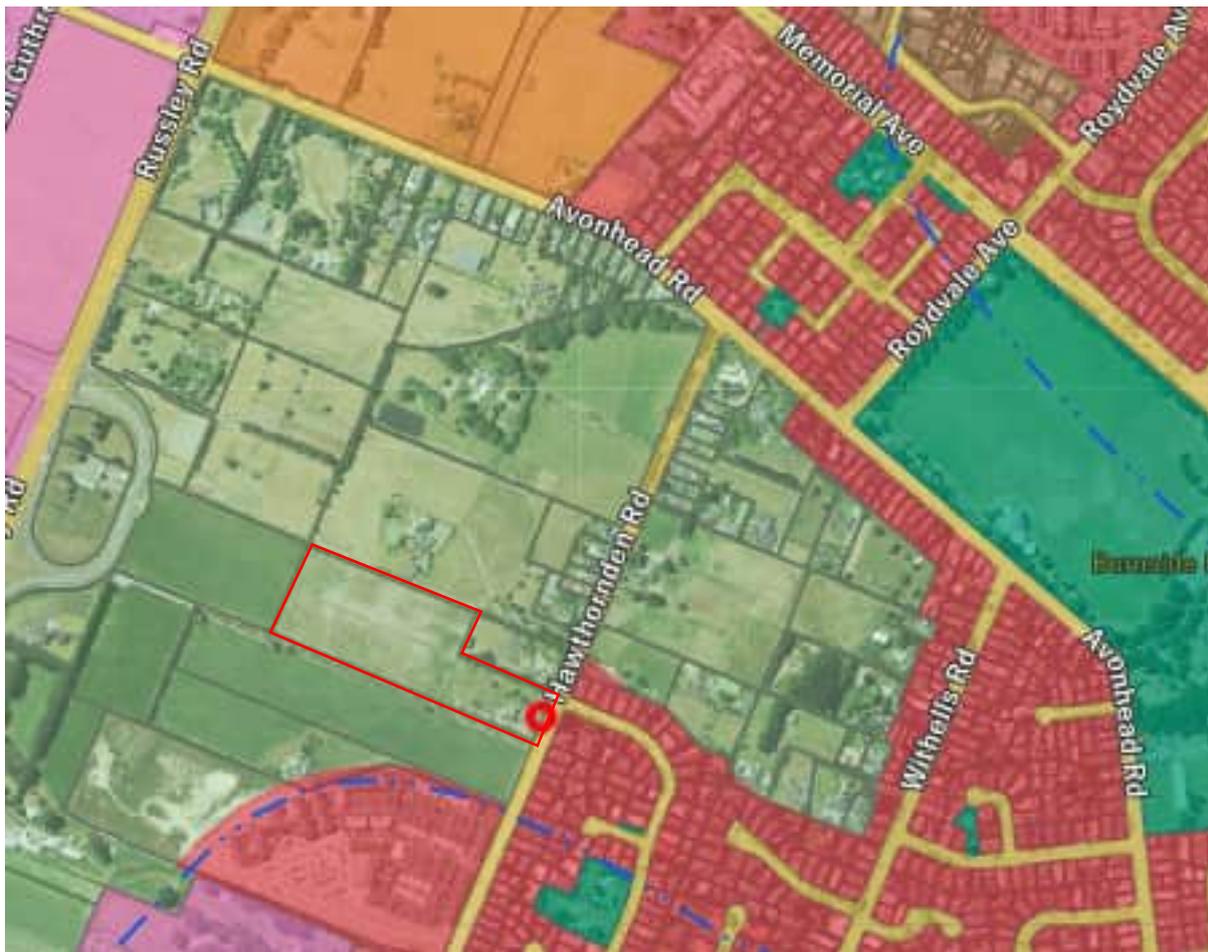


Figure 1: Location of 76 Hawthornden Road – outlined in red.

Legend:

— 50dba Airport Noise Conto

District Planning Zones

- Residential Zone
- Open Space Zone
- Commercial Zone
- Rural Zone
- Industrial Zone
- Transport Zone
- Special Purpose Zone

Relief Sought (see also Response to Online Questions below)

We seek the following amendments to the Draft Greater Christchurch Spatial Plan (the Spatial Plan), and any other additional, consequential or alternative amendments which give effect to the intent of our submission and our interests:

Map 5: Areas to protect and avoid, Map 9 Strategic infrastructure

Amend Maps 5 and 9 such that the Christchurch Airport Noise Control Zone (CANCZ) apply to land within the 57 dBA airport noise contour, such contour to be based on the methodology adopted in the Christchurch Airport Remodelled Contour Independent Expert Panel Report (June 2023) except that it be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths and not ultimate runway capacity; and that the Annual Average not Outer Envelope contour apply. Maps 5 and 9 should also show the 65 dBA airport noise contour, based on the same assumptions and methodology as stated above for the 57 dBA contour, and the Spatial Plan should clarify that sensitive activities (as defined in the Christchurch District Plan, or similar) are permitted between the 57-65 dBA contour, subject to appropriate acoustic insulation, and that no noise mitigation measures are required outside the 57 dBA airport noise contour.

Reason:

The Map 5 and 9 Christchurch Airport Noise Control Zones show the operative CIAL airport 50 dBA and 55 dBA airport noise contours. These are now out of date. The amended contours as recommended by the Independent Expert Review Panel are based on the most up to date information and best practice, but do not make recommendations regarding the appropriate contour to use for noise control purposes, and only model future airport growth projections based on ultimate runway capacity (as per their terms of reference).

The amended CACNZ sought in this submission is consistent with international best practice and NZS 6805:1992, Airport Land Use Management and Land Use Planning (NZS 6805) and is the most appropriate way to achieve the purpose of this Act having regard to the costs, benefits and risks associated with alternatives.

Protecting strategic infrastructure

Appropriate measures should be applied ~~Urban development should be avoided~~ around strategic infrastructure, to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network (see Map 9).

Reason:

Consistent with Christchurch District Plan Change 5E decision which requires acoustic insulation for sensitive activities where noise levels exceed 55 dBA (noise) and 57 dBA (road noise). The same approach i.e. managing noise effects on sensitive with acoustic insulation requirements should apply to airport noise. This is also the current operative District plan requirement for development subject to airport noise.

Maps 2 and 14

Amend Maps 2 and 14 to identify land between the 50-57 dBA revised airport noise contours (as requested to be defined under 'Maps 5 and 9' above) as new/expanded residential areas, with no restrictions in relation to airport noise, including 76 Hawthornden Road. In the alternative, some of this land (but not 76 Hawthornden Road) could also be identified for business purposes. 76 adjoins existing residential development and suitable for residential development.

Table 2: Sufficiency of housing development capacity to meet projected demand (2022 – 2052)

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Decisions on recent Selwyn private plan change requests consistently agree with evidence that the Council's housing and business capacity assessments underestimated housing and business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlies the figures in Tables 2 and 3. They should be revised to reflect best practice and ensure that they comply with the NPS-UD.

Response to Online Form questions (where relevant to Equus Trust and our interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May

2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere, including urban development within the 57 dBA airport noise contour, as sought in our submission.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies for many first time home buyers. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

There needs to be a balance between and ample provision for greenfield development and intensification, including our land (the Site) in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an ageing population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses future development and investment around the MRT corridor and core PT corridor. 76 Hawthornden Road is located close to two core PT corridors (and potential future MRT route) – along Russley Road and Memorial Avenue - and is an ideal location for urban development, including potential medium/high density residential development. Its development for residential purposes will contribute to a well functioning urban environments.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

#4Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions. Further residential and business development opportunities, including for 76 Hawthornden Road need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Manmeet **Last name:** Singh

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

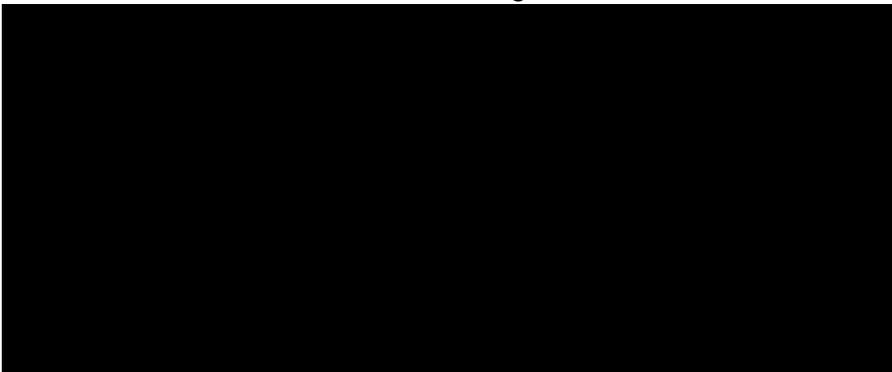
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2116SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN MANMEET SINGHdocx



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Manmeet Singh



Contact Person: Fiona Aston

Decision sought

For the Greater Christchurch Spatial Strategy to identify the land shown in **Figure 1** below as part of the existing urban area or as a new/expanding residential area i.e amend Maps 2 and 14 as shown in **Figure 3** below.

Background

Manmeet Singh lodged submissions on the Proposed Selwyn District Plan (PSDP) and Variation 1 to the PSDP seeking to rezone land in Allendale Lane, South Lincoln either General Residential / Medium Density or as an alternative, Residential Large Lot. Hearings have been held on both the PSDP and Variation submissions. The expected yield from these options ranges from between 40 lots for a Large Lot Residential Zone to approximately 140 housing units for either a General Residential or Medium Density Zone. The final form and quantum of residential development is largely dependent on whether there is a dwelling set back to avoid any potential reverse sensitivity effects from the nearby Lincoln Wastewater Treatment Plant (LWTP) and if so, what that set back requirement is.

Current Situation

In the PSDP the Site is zoned General Rural Zone Special Control Area RD1 Inner Plains (GRUZ SCA-RD1). The minimum lot size for subdivision and a dwelling is still 4 ha. The Site as a whole is identified with an Urban Growth Overlay in the PSDP, but as a future rural residential area (presumably to give effect to Policy 6.3.9 in the CRPS, given the Site's location outside of Projected Infrastructure Boundary on Map A). However, there is no Rural Residential Zone in the PSDP, with the closest zone being the Large Lot Residential Zone (LLRZ) with a minimum average subdivision requirement of 5000m². However, there were numerous submissions that requested smaller lot sizes for the LLRZ which would be more consistent with an urban residential zoning (in terms of Map A in the CRPS).

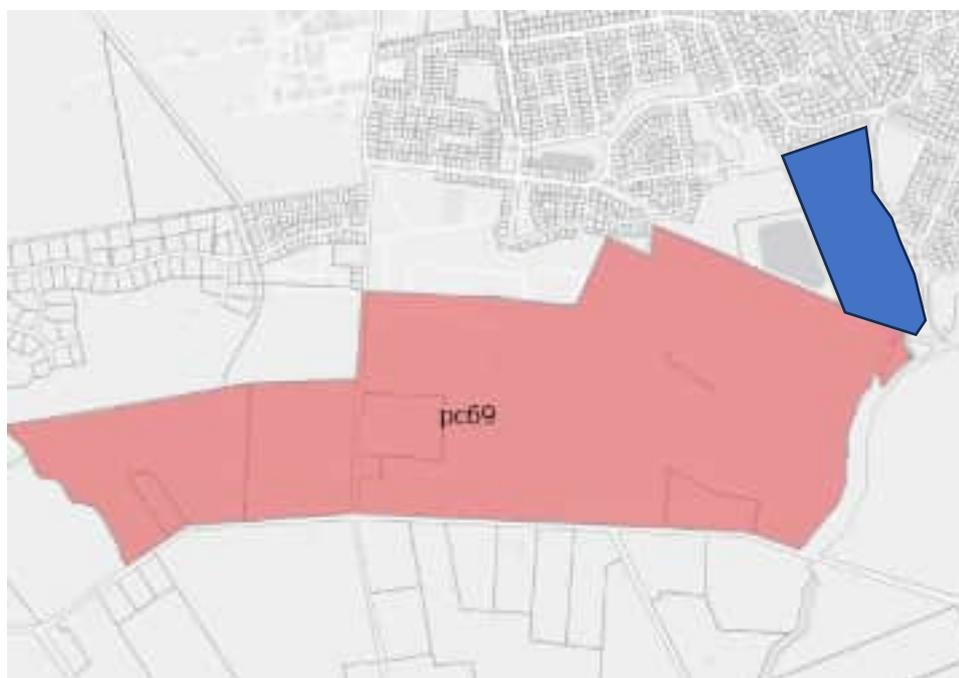


Figure 1. Location of Site shown in blue. PC69 (shown in pink) for residential zoning has been approved but is subject to appeal.

There was consensus among the planning and urban design experts at the rezoning hearings that the Site was well located for intensification and a rural residential development would not be appropriate given its connectivity to existing and future neighbourhoods. The only substantive issues that were in contention were what set back from the Lincoln Wastewater Treatment Plant would be appropriate to avoid reverse sensitivity effects, and the adequacy of the entrance into the Allendale Lane extension. The Panel was presented a considerable amount of expert evidence on both matters and it will be up to the Panel to determine what level of development would be appropriate.

There appears to be no dispute that the land should be used more intensively, and the issue is simply how many houses can be accommodated within the constraints imposed by an odour set back and the vehicle capacity of the entrance to the Allendale Lane extension. Several development scenarios under different odour set backs were sought by the Panel, including the one in Figure 2 showing the 100m setback.

Whatever the number the final yield is, it will be at a greater density than rural residential, and therefore should be included in the urban area. Not to do so would create an anomaly on the planning map by retaining the rural area between the approved PC 69 land to the south, and the existing residential area to the north.



Figure 2. Possible development scenario assuming a 100m odour set back



Figure 3: Subject site shown, by the blue dot, to be shown as existing urban area or new/expanding residential area on Maps 2 and 14.

Figure 3 illustrates the connection between the Approved Plan Change 69 area, and the existing residential area via the subject site. It also shows the Site's proximity to the town centre

Key reasons why the land should be included within the urban area are:

1. The land is already in an Urban Growth Overlay and we expect its zoning to residential will be confirmed in August when decisions on the PSDP are issued.
2. The development of the land promotes urban consolidation as it in effect constitutes infill development.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Rob **Last name:** Nicol

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

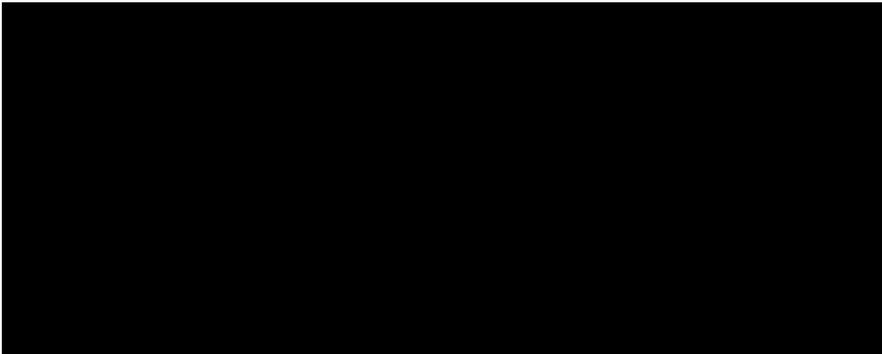
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2268GCSpatial Plan submission - Rob Nichol



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Rob Nicol



Contact Person Fiona Aston

Hearing Options

I do wish to be heard in support of my submission. If others make a similar submission, I may consider presenting a joint case with them at the hearing.

Relief Sought (see also Response to Online Questions below)

I seek that 91 Townsend Road as identified on **Figure 2** (the Site) and other land within the area identified as a gap in the South Rangiora urban form on **Figure 2** (outlined in blue) be identified on Maps 2 and 14 of the Greater Christchurch Spatial Plan (the Spatial Plan) for future urban growth as shown on **Figure 3**; remove or amend the proposed Green Belt around southern Rangiora to enable urban growth here; and any other additional, consequential or alternative amendments which give effect to the intent of our submission and my interests.

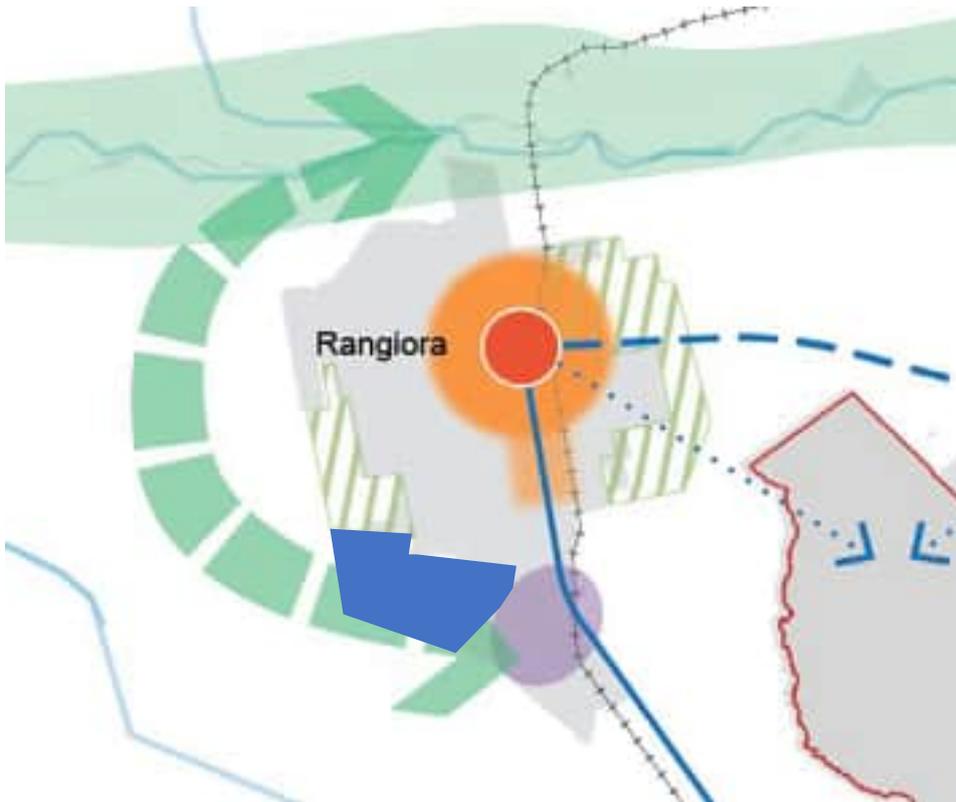


Figure 1: Area sought for inclusion on Figures 2 and 14 for urban growth purposes shown in blue.

Introduction & Background

I own 91 Townsend Road south Rangiora (the Site) as identified on the aerial photograph (**Figure 5**) and Proposed Waimakariri District Plan (PWDP) Variation 1 planning map (**Figure 2**) below. The Site adjoins the West Rangiora Future Development Area (to the north) and the Southbrook General Industrial area is located to the east, with several intervening rural lifestyle blocks in between.

My land is ideally suited for urban residential development for the reasons outlined below. I have not submitted on the PWDP seeking rezoning as I have only very recently become aware of the planning processes involved. My intention now is to pursue rezoning utilising the various planning processes available to me.

The Site and Merits of Proposed Rezoning

The Site is identified as a medium flood hazard area (see **Figure 3** below) where minimum finished floor levels are required to manage any potential flood risk.

The Site is ideally located and suited for residential development (subject to flood mitigation measures as outlined above). It offers the potential for very high amenity residential sites with an attractive north facing outlook to the Southbrook Stream. There is excellent off road

pedestrian/cycleway connectivity via the Southbrook Stream to the wider Southbrook and Rangiora area.

Urban development here, including potentially other land in the current 'gap' in the South Rangiora urban form, as identified on **Figure 2** below will consolidate and complete the logical 'urban form' of this part of South Rangiora. It is also consistent with the residential growth directions for Rangiora identified in the Waimakariri District Development Strategy 2048¹ (see **Figure 3** below).



Figure 5: Aerial photograph of Site (outlined in red)

¹ https://www.waimakariri.govt.nz/__data/assets/pdf_file/0022/33727/180525057771-District-Development-Strategy-DDS-2018-FINAL-Web.pdf

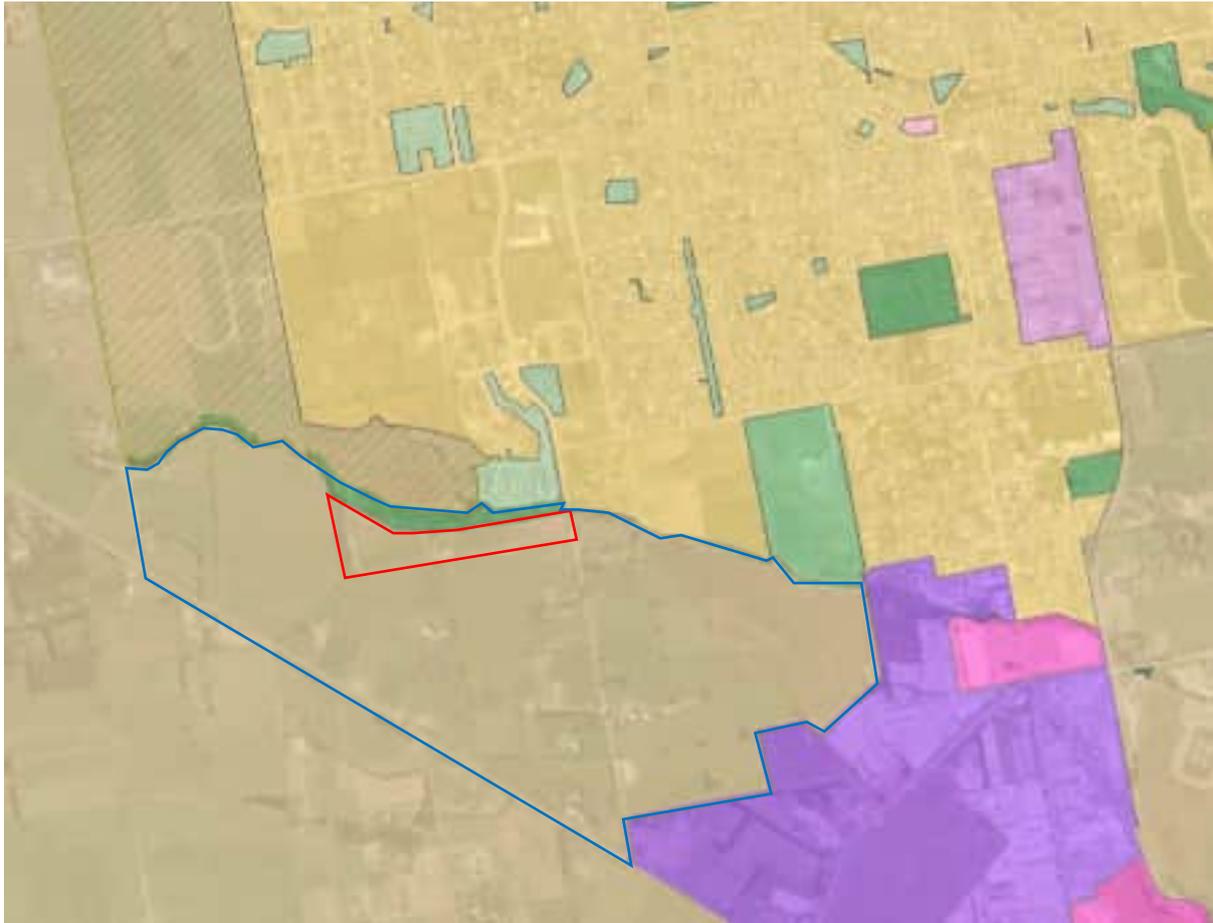


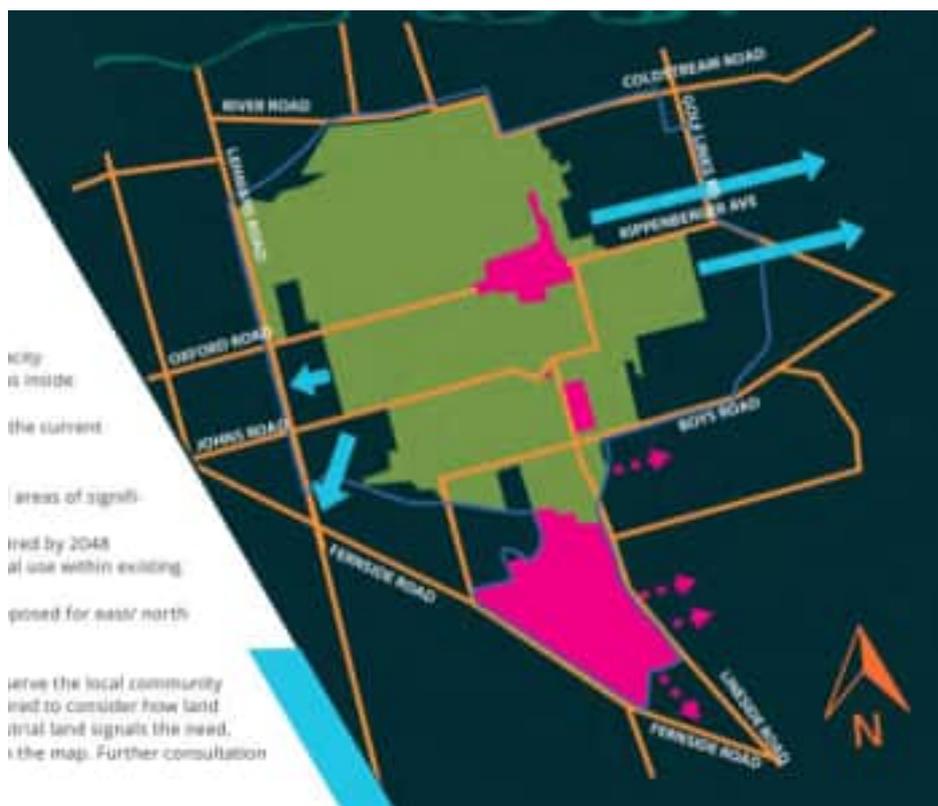
Figure 2: PWDP Variation 1 planning map – south Rangiora. The Site is outlined in red. Current gap in Rangiora urban form outlined in blue.

Legend:

-  Medium Density Residential Zone (MRZ)
-  Settlement Zone (SETZ)
-  Medium Density Residential Zone - Variation 1
-  General Industrial Zone (GIZ)
-  Heavy Industrial Zone (HIZ)
-  Light Industrial Zone (LIZ)
-  General Rural Zone (GRUZ)
-  Rural Lifestyle Zone (RLZ)



Figure 3: Waimakariri Flood Hazard Map² – Site outlined in red. Medium flood hazard areas coloured blue.



² See

<https://waimakariri.maps.arcgis.com/apps/MapSeries/index.html?appid=16d97d92a45f4b3081ffa3930b534553>

Figure 4: Rangiora growth directions (District Development Strategy 2048). Proposed residential growth directions identified with blue arrow. Site location identified with red star.

Table 2: Sufficiency of housing development capacity to meet projected demand (2022 – 2052)

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Decisions on recent Selwyn private plan change requests consistently agree with evidence that the Council's housing and business capacity assessments underestimated housing and business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlies the figures in Tables 2 and 3. They should be revised to reflect best practice and ensure that they comply with the NPS-UD.

Response to Online Form questions (where relevant to my submission and interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

I am concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere, including urban development within the 57 dBA airport noise contour, as sought in my submission.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies for many first time home buyers. The background work on Proposed Change 14 to the Christchurch District Plan demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

It is worth noting that an important key reason why Rolleston and Rangiora have grown so rapidly post earthquakes is because they have met the very high market demand for quality affordable housing, the consenting process has been generally far easier than for multi-unit development and the local councils more enabling of development, including a flexible approach towards provision of required infrastructure. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

There needs to be ample provision for both in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

There needs to be a balance between and ample provision for greenfield development and intensification, including my land (the Site) in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan appears to almost exclude further greenfield development through:

- Considering adopting a greenbelt policy which is in effect fundamental to an urban containment policy, and
- Not identifying any additional greenfield development in addition to what has already been approved in the Selwyn and Waimakariri District Plans.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an ageing population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses future development and investment around the MRT corridor and core PT corridor - rather than other urban centres and other important transport corridors, and other locations which will contribute to well functioning urban environments.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'.

The Spatial Plan needs to support urban consolidation, rather than a total focus on a containment urban form i.e. compact scenario, with flexibility in the planning process to extend the urban area in particular circumstances. There are gaps in the existing urban form in a number of the townships (including as identified in this submission at south Rangiora) where urban development should be enabled, to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with existing good accessibility between housing, jobs, community services, natural spaces, and

open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c).

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

Do you support the concept of a Greenbelt around our urban areas?

No. The concept of a 'green belt ' does not appear to be well understood. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the Canterbury Regional Policy Statement (CRPS). Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to the inflexibility a green belt approach creates. This situation is contrary to the responsive planning expectations contained in the NPS-UD.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

#4Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions. Further residential and business development opportunities, including for 91 Townsend Road need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
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- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

National Policy Statement – Highly Productive Land (NPS-HPL)

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the land adjoining the existing urban areas in Greater Christchurch is already highly fragmented into appx. 4 ha blocks which are too small to be highly productive. This includes my block which is 6.31 ha, prone to wetness and only capable of generating a minimum annual income of appx \$5000 per annum.

The Site and other rural land surrounding Rangiora (and other townships within the Greater Christchurch area) are zoned Rural Lifestyle in the PWDP and are exempted from the NPS-HPL (Clause 5.7.bii).

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for Greater Christchurch.

The Spatial Plan discussion/direction re HPL needs to be amended accordingly.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Four Stars Development Ltd & Gould
Developments Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

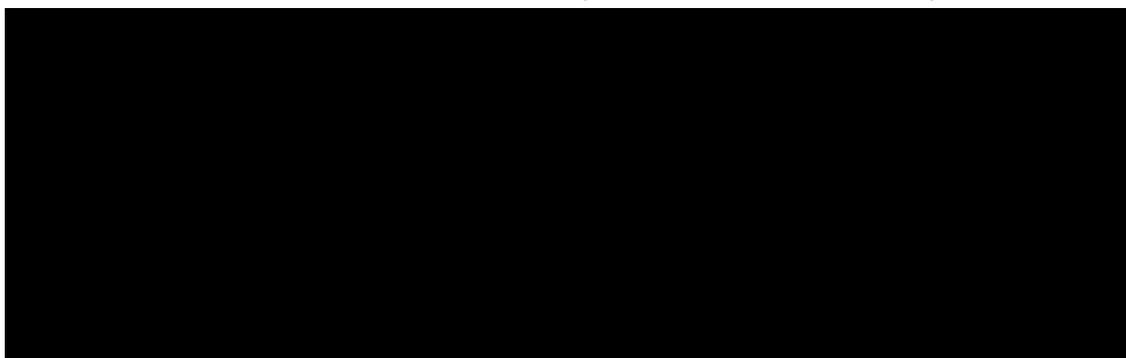
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2067 final SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN Four Stars and Gould Developments



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Four Stars Development Ltd & Gould Developments Limited



Contact Person: Fiona Aston

We wish to be heard in support of this submission.

Decision requested.

Include the area shown on **Figure 1** below within the Existing Urban Area or show as 'New/expanding residential area' on Maps 2 and 14 of the Greater Christchurch Spatial Plan (GCSP) as shown in **Figure 3** below.

Adopt 55dBA is the appropriate contour within which residential development and other sensitive land uses, should be discouraged or avoided.

In the alternative or as part of airport protection, if the Greater Christchurch Spatial Plan (GCSP) Hearing Panel considers the 50dBA to be the appropriate contour, then it should not have an associated avoidance policy, rather it should be to "manage" development to ensure protection of residential amenity by building design.

That the airport noise contour(s) in the GCSP are the Average Annual Noise Contour (AANC), not the Outer Envelope Contour (OEC).

Any other alternative, additional or consequential amendments to the GCSP to give effect to the intent of this submission.

Introduction

Four Stars Development Ltd and Gould Developments Limited (Four Stars and Gould) lodged a submission on the Proposed Selwyn District Plan (PSDP) requesting the 53ha (approx.) land in **Figure 1** be rezoned General Residential, except that those parts currently under the CIAL 50 dBA Ldn airport noise contour as shown on the Proposed Selwyn District Plan (PSDP) planning map to be zoned General Residential Deferred or Future General Residential Zone or Future Urban Zone.

Four Stars Development Limited and Gould Developments Ltd also lodged a private plan change request to the Operative Plan with the Council (PC 71) seeking a similar outcome. The Commissioner approved PC 71 apart from the land under the 50Ldn airport noise contour and the Council has made that approved PC71 operative.

The decision however excluded that part of the Site within the 50 dBA airport noise contour denoted in both the Regional Policy Statement and the Operative District Plan. However, in his recommendation, the Commissioner found that in all other respects this land was entirely suitable for residential development and directly achieved the purpose of the National Policy Statement – Urban Development (NPS-UD).

A similar submission was lodged on Variation 1 to the PSDP seeking Medium Residential Zone (MRZ) with a decision on that submission expected in August. However, the Council has also notified a Variation to the various rezoning private plan changes and for PC 71 the land subject to the 50 dBA contour was identified as Inner Plains, Future Residential (**Figure 2**). In summary a significant portion of the Four Stars and Gould land has been rezoned for urban residential purposes. All that remains is for the remaining portion to be clear of the restrictions imposed by the current 50 dBA airport noise contour and rezoned for urban residential purposes.



Figure 2 Appendix 3: Variation to Private Plan Change 71 – Rolleston

Remodelling of Airport Noise Contours

The 50 dBA and the other noise contours have been remodelled and peer reviewed by an Independent Expert Panel. The remodelled contours are based on the best practice and the most up to date information.

The contours shown in Figure 1A below illustrate the Outer Envelope boundary (OEB) and that shown in Figure 1B illustrates the Annual Average boundary. Only the OEB 50 dBA contour affects the subject land. However the 50 dBA contour is not the appropriate control for protecting the Airport from reverse sensitivity effects. That level of protection is unique both in New Zealand and globally and based on a very conservative approach adopted by previous planning agencies in the distant past. The Panel may be aware of the findings in the Environment Court in *Robinsons Bay v CCC (C60/2004)* that if the contour were set at 55

Ldn it is unlikely there would be any prospect of a curfew, so 50 Ldn is not required to protect this "critical infrastructure". Also, the Airport's advisors (Marshall Day) have consistently advised in respect of other New Zealand Airports (including Auckland, Wellington and Queenstown) that level of 55 dBA is considered as providing a reasonable level of residential amenity. The adoption of a 55 dBA contour based on Annual Average Noise exposure for airport protection purposes is therefore sought through the Spatial Plan process. The operative airport noise contours are outdated and the GCSP should adopt the reviewed ones but use the 55 dBA contour for the purpose of avoiding reverse sensitivity effects. Waiting for the review if the CRPS will delay the confirmation of the contours for several years without any commensurate benefits.



Figure 1A The 2023 remodelled 50 Ldn (solid green line)- the Annual Average Contour
Four Stars Gould Site marked with blue star (appx)

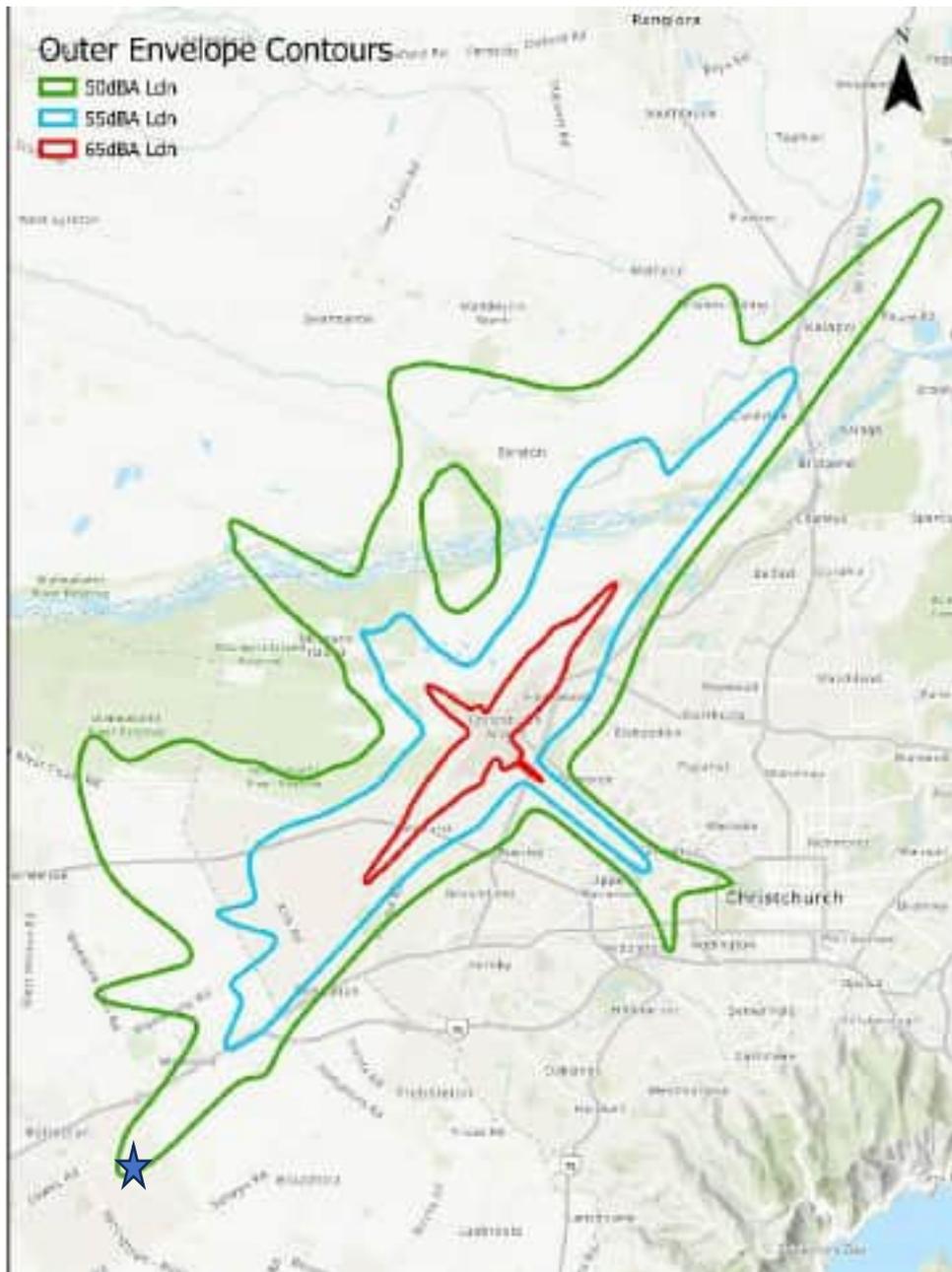


Figure 1B The 2023 remodelled 50 Ldn (solid green line) Outer Envelope boundary. Four Stars Gould Site marked with blue star (appx)



Figure 3 Amendment sought to Maps 2 and 14 – include the area shown in blue as ‘existing urban area’ or ‘new/expanding residential area’

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023**First name:** Richard and Geoff **Last name:** Spark**Your role in the organisation and the number of people your organisation represents:****Would you like to speak to your submission?**

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File

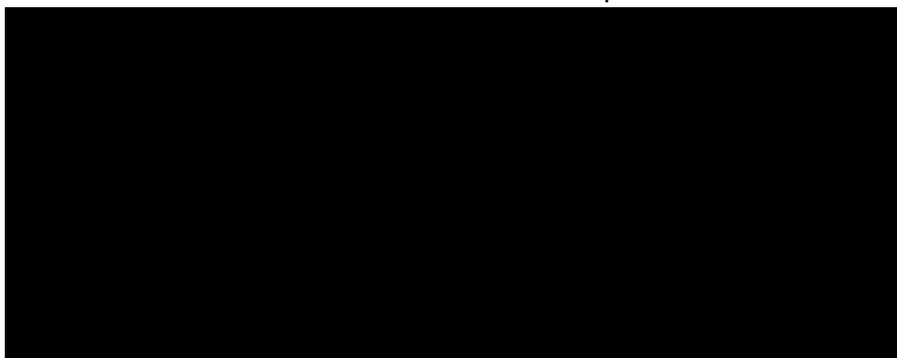
2230final Spark SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Richard and Geoff Spark



Contact Person: Fiona Aston

Hearing Options

The Submitters do wish to be heard in support of our submission. If others make a similar submission, the Submitters may consider presenting a joint case with them at the hearing.

Introduction & Background

Richard and Geoff Spark own land in south east Rangiora part of which is being proposed for urban development (mostly residential) (**Figure 1**). The northern part of their land (on the north side of Boys Road - 'Block A') is identified for future development in both the Canterbury Regional Policy Statement (CRPS) and Proposed Waimakariri District Plan (PWDP) (SE Rangiora Development Area (**DEV-SER**)). The southern block (on the south side of Boys Road - 'Block B') is outside the Projected Infrastructure Boundary on Map A of the CRSP. Submissions have been made on the PWDP to have both areas (approximately 55ha) rezoned for urban purposes.¹

¹ https://www.waimakariri.govt.nz/_data/assets/pdf_file/0019/112159/183-SUBMISSION-RICHARD-AND-GEOFF-SPARK-ASTON-CONSULTANTS.pdf

[RICHARD-AND-GEOFF-SPARK-ASTON-CONSULTANTS.pdf](#)



Figure 2: Approximate area sought for inclusion on Maps 2 and 14 as Existing Urban Area or New/Expanded Residential Area shown with blue oval

In summary:

1. The Block A and Block B are a logical and planned location for further urban growth of Rangiora. Rezoning this land will contribute to achieving a compact, and efficient, urban form with excellent connectivity by multiple transport modes.
2. The land forms part of a bigger and logical extension to the growth of SE Rangiora and linking with proposed growth areas to the east including Tuahiwi, Ravenswood, Woodend and Pegasus, as shown on Maps 2 and 14.
3. The proposed Rangiora eastern by-pass road will bisect the current Spark farm, and leave the southern block sought to be rezoned as an isolated block of rural land sandwiched between existing urban development and the proposed Rangiora eastern bypass (as shown on the Figure 1 planning map)
4. The alternatives of retaining Rural Lifestyle zoning or developing as Large Lot Residential are not an efficient use of this block of land located as it is immediately adjoining the intended urban area of Rangiora, and in a location accessible to the town centre by active transport modes as well as car.

Urban development here will contribute to a well functioning urban environment, as defined in the NPS-UD and will help meet the imminent housing capacity shortfall at Rangiora.

Response to Online Form questions (where relevant to Spark submission and interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

The Submitters are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. While the urban form scenarios evaluated provide a broad outline of settlement growth options, they should, in our view, be explored in more detail. For example, in relation to access to social and economic opportunities - local activities, Scenario C (Dispersion) performs worst. It depends on how the dispersion is managed. If Rolleston and Rangiora were allocated more growth (and subject to local structure plans), these settlements could become more self contained in terms of access to social and economic activities. This would contribute to a reduction in transport related greenhouse gas emissions and possibly delay the need for MRT to Rangiora. What other settlement patterns were modelled?

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree in part.

Apartments and terraced housing are not necessarily more affordable than other housing typologies for many first time home buyers. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

One potential 'fishhook' is how the intensification process is to be integrated with the timing of the MRT. For example between Papanui and Belfast (around 5.5 km) it is proposed to be distributed along the entire length. How long will it take to generate the necessary quantum of households to provide meaningful support to MRT, particularly with the existing roading connections available?

Further greenfield development is still going to be needed. It is worth noting that an important key reason why Rolleston and Rangiora have grown so rapidly post earthquakes is because they have met the very high market demand for quality affordable housing. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

Therefore there still needs to be a balance between housing intensification and greenfield development. The Spatial Plan appears to almost exclude further greenfield development through:

- Considering adopting a greenbelt policy which is in effect fundamental to an urban containment policy, and
- Not identifying any additional greenfield development in addition to what has already been approved in the Selwyn and Waimakariri District Plans.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an aging population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing, including medium density 'infill' and greenfield development, including some provision for lower density/large lot residential development and retirement villages.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses too much future development and investment around the MRT corridor – rather than other urban centres and other important transport corridors, and other locations which will contribute to well functioning urban environments.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'.

The Spatial Plan needs to support urban consolidation, rather than a total focus on a containment urban form i.e. compact scenario, with flexibility in the planning process to extend the urban area in particular circumstances. There are gaps in the existing urban form in a number of the townships, including at SE Rangiora where the submitter seeks rezoning. In these locations urban development can be enabled, to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with existing good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c).

In summary we consider that more comprehensive time based modelling of land use – transportation option is needed so that intensification options can be better evaluated and staged across the sub region as a whole. Recognition should be made of gaps in the existing urban form in a number of the townships, including at south east Rangiora, where urban development and urban consolidation can be enabled.

Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes in principle but see comments below re the Blue – Green network. Also, the Submitters consider that the Plan needs to more explicitly adopt a catchment approach to the various blue / green networks. An important asset that Greater Christchurch has is its water and the integration between urban development and water quality and quantity is fundamental to the future of the sub region.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

Do you support the concept of a Greenbelt around our urban areas?

The concept of a 'green belt' does not appear to be well understood in the terminology. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the CRPS. Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to the inflexibility a green belt approach creates.

We submit that if there is to a Greenbelt then there should be scope to develop within it as was the case with Change 1 to the CRPS. Its objectives also need to be clear. Is it to prevent the coalescence of settlements?

A Greenbelt separates and so by definition is located in close proximity to urban areas. It should accommodate low density LLR living opportunities sites in the 1000m² + size range in appropriate locations which can contribute to an open spacious character, in contrast to the more dense urban areas.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

-Offer opportunities for accelerated and/or significant development;

-Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and

-Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Partially

Why (please specify the Priority Area):

The Submitters agree with the Rangiora Priority Area and the identification of Rangiora as the major town in Waimakariri. As housing stock in Rangiora (and older suburbs in Christchurch City and Selwyn) ages and communities evolve, community renewal with a multi agency approach will be needed to deliver redevelopment packages. However this will not substitute the need for more consolidated greenfield development in Rangiora and elsewhere.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there needs to be amendments to as set out below (shown in bold and underlined or strike out)

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

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

Reason – consistent with wording and policy intent of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD and better gives effect to the NPS-UD policy framework.

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

The Submitters support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, a focus on attempting

to influence the current urban form of Greater Christchurch to to create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. MRT needs to be supported by a government commitment to help fund the work. Without this, MRT is not realistic. Also of concern is that the compact urban form proposal underpinning the Spatial Plan has been chosen even though it has Otherwise negligible benefits in terms of reduced greenhouse gas emissions compared to other urban form scenarios i.e a combination of consolidation and dispersed growth around existing townships.

Do you have any feedback on other aspects of the Draft Spatial Plan?

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It does not provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

In its current form the Submitters question whether it will give effect the NPS-UD.

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the land adjoining the existing urban areas in GC is already highly fragmented into 4 ha blocks which are too small to be highly productive. This has been acknowledged numerous times in evidence presented on the Waimakariri and Selwyn District Plans. The Selwyn Proposed District Plan Background Report 'Rural Zone Density

and Minimum Lot Size Farm Advisory Review of Options' by Macfarlane Rural Business (2017) advised:

The Inner Plain minimum lot size is 4ha. It is very difficult to operate these lots economically with mainstream farming systems and generally they are utilised as residential lifestyle properties. The lack of scale, infrastructure and farming knowledge on most of these properties precludes the ability to make a sustainable return. Furthermore, most of these properties would have an effective farmable area considerably less than 4 hectares.

The Spatial Plan and consequential statutory documents need to have a 'cut off point' where it is assumed that the NPS-HPL does not apply. For example policy guidance is needed to establish circumstances under which the NPS-HPL will not apply e.g. minimum subdivision size and/or other factors (e.g. availability of water for irrigation), versatility of soils. . This could be an output from the work Ecan is doing around HPL mapping under the NPS-HPL. But in terms of the National Planning Standards, most if not all of the rural areas within the Greater Christchurch area are likely to come under the definition of the Rural Lifestyle Zone:

Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.

The Rural Lifestyle Zone is exempted from the NPS-HPL (Clause 3.5.7.ii).

The land the Submitters seek to be rezoned comprises Temuka soils. It is LUC3 and not versatile. The land is zoned Rural Lifestyle in the PWDP and thus exempted from the NPS-HPL. The northern block (Block A) is identified for future urban development and exempted from the NPS-HPL (Clause 3.5.7bi).

Loss of HPL is not a significant issue in the context of urban growth scenarios for Greater Christchurch.

Maps 2 and 14

The Spatial Plan appears not to meet the requirement for a FDS to spatially identify the '*broad locations*' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only appear to show existing urban areas and approved rezonings, and cadastrally based rather than showing broad locations. It appears to continue the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents. A more schematic map would be more appropriate.

Implementation

The submitters agree that there has been traditionally heavy reliance on statutory instruments to implement past urban development strategies and a greater use of non RMA instrument is to be welcomed. However the Draft Spatial Plan appears to fall short of the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years. This is to ensure there is integration with the Long Term Plans process under the Local Government Act.

Ongoing monitoring and review is essential, along with frequent reporting. A written commitment should be included in the respective Long Term Plans with appropriate resources and budgets allocated to this function to meet the FDS mandatory review and updating requirements.

The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change).. The focus of the urban form and future is on one which will support costly and uncertain transport initiatives including MRT. This is not the most appropriate approach. It is one that may have costs that outweigh the benefits. It does not give effect to the NPS-UD nor ultimately the purpose of the Act. Consideration needs to be given to whether the RMA Schedule 1 process can deliver the outcomes sought, , and how e Plan will be impacted by the Act's new structure and purpose.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Robbie **Last name:** McIlraith

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
2018final Spatial Plan submission - Robbie McIlraith



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Robbie McIlraith



Contact Person: Fiona Aston

Hearing Option

I do wish to be heard in support of this submission. If others are making a similar submission, I may consider presenting a joint case with them at the hearing.

Relief Sought (see also 'Response to online submission form questions' below)

Amend Maps 2 and 14 to correctly show the existing urban area at Prebbleton as shown on **Figure 1** below (mid grey) to include all PSDP Large Lot Residential Zones (LLRZ), as shown on **Figure 2** below.

Reason:

Maps 2 and 14 omit some zoned LLR zones. LLRZ is a form of low density residential living and part of the urban form of Prebbleton (and some other Greater Christchurch townships, including Rolleston, West Melton, Lincoln, Tai Tapu, Rangiora, and Woodend).

Further amend Maps 2 and 14 to identify land west of Shands Road as an Existing Urban Area or New/Expanding Residential Area as shown on **Figure 1** below (blue circle), including all of the land the subject to the McIlraith and Dally Trust submission on the PSDP identified in **Figure 2** below.

Reason: this land is ideally suited for full urban residential or LLR development for all the reasons set out in the expert evidence presented in support of the rezoning at the PSDP

hearing (and as further discussed below). It is a 'left over' area of small rural lifestyle blocks (predominately 4 ha or smaller) 'wedged' between the Southern Motorway and the existing Prebbleton urban area which extends to the opposite (east) side of Shands Road. Key reasons for rezoning include:

- These small rural lifestyle lots are too small for any economic productive use;
- The rezoning will contribute to well functioning urban environment with good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- It will meet the unmet demand LLR lots, and go so way towards replacing the 15 preferred rural residential areas in the Selwyn Rural Residential Strategy 2014 (with a total yield of appx 600 LLR lots) which are now fully developed for LLR purposes, rezoned or proposed for full urban residential rezoning;
- It will help meet the mandatory requirement of the National Policy Statement -Urban Development (UDS-NPS) to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households;
- Rezoning meets the NPS-Highly Productive Land (NPS-HPL) Clause 3.6 criteria for rezoning HPL for urban purposes.

Any alternative, additional, consequential or other relief which gives effect to the intent of my submission and my interests.

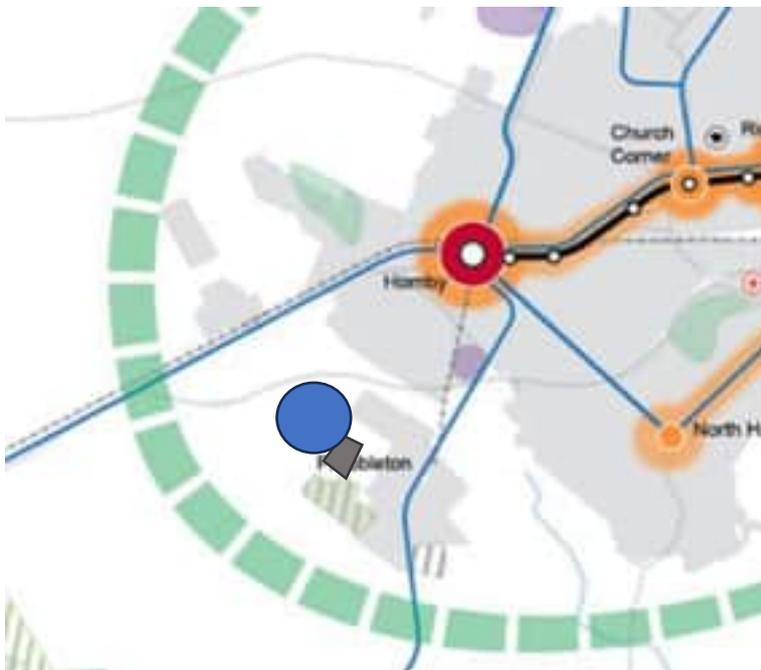


Figure 2: Amendments sought to Maps 2 and 14. Dark grey – Existing Urban Area. Blue Oval – Existing Urban Area or New/Expanding Residential Area

Introduction and Background

I own a rural lifestyle block at 6/602 Shands Road, which is one of a group of seven rural lifestyle blocks with a shared access off the west side of Shands Road. I lodged a submission on the Proposed Selwyn District Plan (PSDP) with the Dally Family Trust who own a neighbouring rural lifestyle block (2.2 ha) at 203 Blakes Road. The submission was lodged on behalf of most of the landowners (further to consultation with them) and sought rezoning of the land identified in **Figure 2** below for Large Lot Residential purposes. We sought average lot sizes of 2000m² or in the less preferred alternative, 5000m².

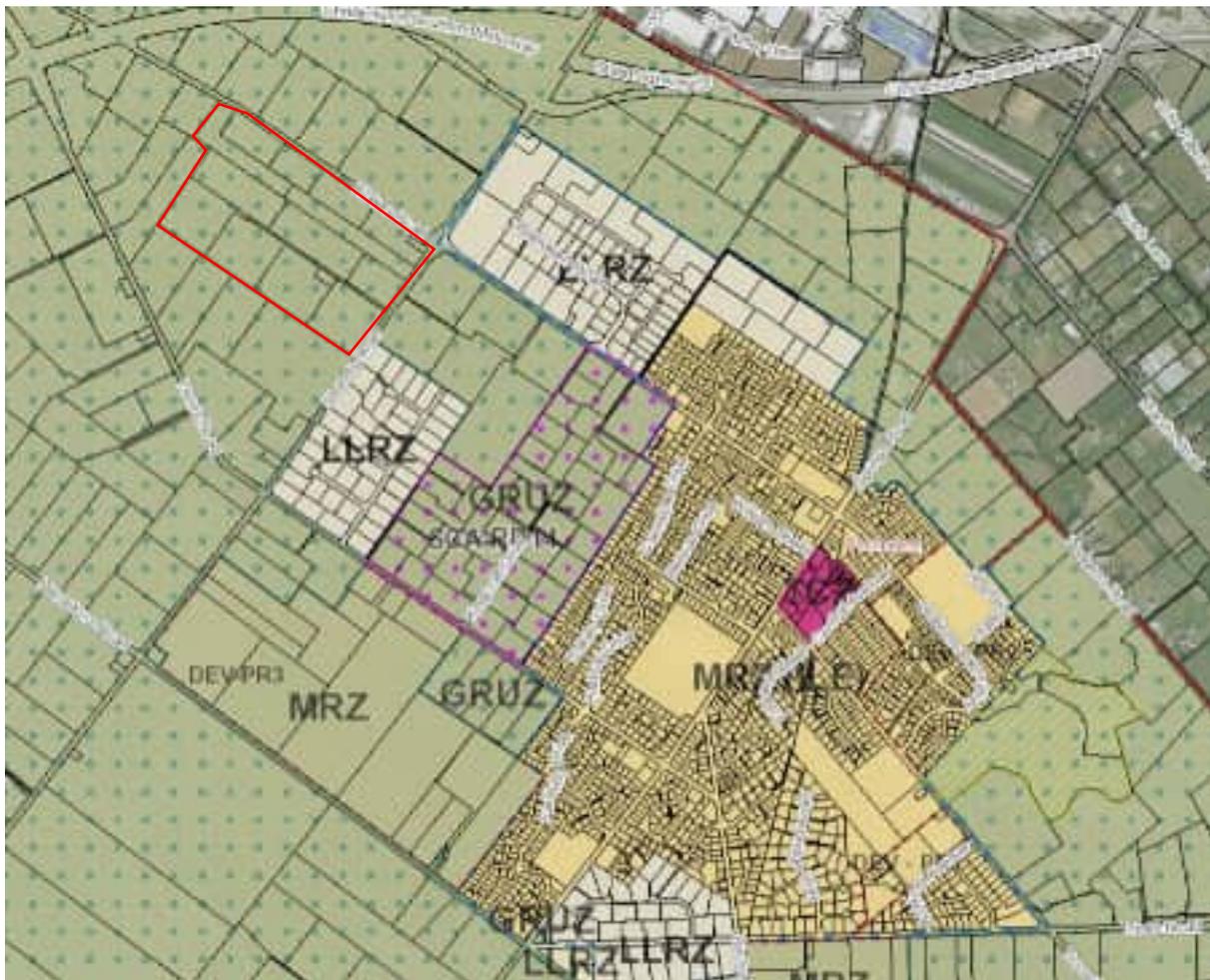


Figure 2: PSDP Variation 1 Prebbleton planning map - land sought to be zoned LLR in McIlraith and Dally Family Trust submission on PSDP outlined in red.

A full suite of expert evidence was presented in support of our PSDP submission and can be found at <https://www.selwyn.govt.nz/property-And-building/planning/strategies-and-plans/selwyn-district-plan/selwyn-district-plan-review/hearings/hearing-rezoning-requests-under-proposed-district-plan/prebbleton>

Decisions on PSDP submissions are to be released on or around 20 August 2023 ahead, of the Greater Christchurch Spatial Plan (Spatial Plan) submissions.

Strategic Urban Form Context – Why a distributed ‘village community’ rather than the proposed compact city approach to future urban growth is needed

Greater Christchurch has a concentric urban form constrained by the coast to the east, hills to the south and Waimakariri River to the north. It is internally connected by a radial hub and spoke network linking all parts of Greater Christchurch. This evident on Maps 2 and 14.

Prebbleton is part of the hub and spoke configuration proving a way point to Lincoln. Historically a small rural village, it has always had a core servicing/ community services component.

One of the overarching directions of the Spatial Plan is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

This direction has merit at a strategic level but its proposed implementation in the Spatial Plan is unnecessarily restricted to just the central spine which actually only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main centres linking up nodes that have little functional relationships or inter-dependencies. Movement along the spine or between nodes/centres on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the “village communities’ that are present and well established in Christchurch. These urban villages need to be supported and enabled to thrive and grow to support the social, community and business services that are there. The focus should be on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities.

The fundamental form of Greater Christchurch is almost fixed. The Spatial Plan should be supporting a 50 year outcome that supports and reinforces the distributed community form. It should not try to create a new form on a set of considerations driven and dominated by public or mass transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

Prebbleton has an important role to play in a “village community” future or a distributed intensification/ development scenario. It can contribute to community well-being in the draft central spine model too, but less effectively.

To be future focussed, and to build on the existing community and private assets of Prebbleton, the Spatial Plan should provide an enabling policy framework that supports a sustainable urban form for Prebbleton. That framework should specifically provide for growth options as set out in this submission.

Further explanation and reasoning for the preferred distributed 'village community' urban form is provided in **Appendix A**.

Responses to Online Submission Form Questions

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the GCSP and future urban form is predicated on a future PT system including Mass Rapid Transit (MRT) proposal which may never 'see the light of day' i.e. there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and does not justify the very large investment required for MRT (\$3-\$4 billion to build).

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree. Apartments and terraced housing are not necessarily more affordable than other housing typologies. The key reason why Rolleston has grown so rapidly post earthquakes is because it has met the very high market demand for quality affordable housing, and the local council generally enabling of development, including a flexible approach towards provision of required infrastructure. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

There needs to be ample provision for both in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

This requires a balance between housing intensification and greenfield development. The Draft Greater Christchurch Spatial Plan (GCSP) does not achieve this. The Spatial Plan is proposed as the Future Development Strategy as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the Spatial Plan does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There will be a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an aging population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing, including medium density 'infill' and greenfield development, including some provision for lower density/large lot residential development.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times, including at Prebbleton. This is totally contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

Limitations of compact urban form

The 'compact urban form' proposed focuses far too much future development and investment around the MRT corridor – rather than other urban centres and transport corridors, and other locations which will contribute to well functioning urban environments.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'.

Urban consolidation

The Spatial Plan needs to support urban consolidation, rather than a total focus on a compact urban form, with intensification centred along a possible future MRT corridor and a few major centres. There are gaps in the existing urban form in a number of the townships where urban development needs to be enabled, to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with

existing good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c).

Prebbleton

This the case at Prebbleton, where there is gap in the urban form of West Prebbleton as illustrated on the maps below.



Figure 3: extract from GCSP Map 2 – gap in urban form outlined in mustard yellow. Future growth direction for Prebbleton sought to be included on Maps 2 and 14 identified with red arrow (see also Figure 1).

Our land is located on the west side of Shands Road, Prebbleton and is part of a ‘left over’ area of small rural lifestyle blocks (predominately 4 ha) which are too small for any economic productive use, and which are ideally suited for Large Lot residential purposes. All of the preferred rural residential areas (with a total yield of appx 600 lots) in the Selwyn Rural Residential Strategy 2014 (bar one, which is a single site at south Lincoln with a potential yield of one lot) have now been fully developed for LLR purposes, or rezoned for full urban residential development or are subject to Proposed District Plan submissions seeking full urban residential zoning (see Figure 3 below).

Our land is an ideal location for replacement rural residential/LLR development or full urban residential development and should be identified as a future growth area in the Spatial Plan. LLR, consistent with the National Planning Standards definition, should enable lots in the 1000m²–3000m² size range (with no minimum average lot size), not average 5000m² lots as is the case under the current Canterbury Regional Policy Statement definition of ‘rural residential’. Average 5000m² lots are larger than the market demand, and are a less efficient use of the land. Our submission on the Proposed Selwyn District Plan is attached. See also evidence in support of our submission -

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E5%20Rezone%20%2D%20Prebbleton%2FHearing%2030%2E5%20Submitter%20Evidence%2FDPR%2D0488%20Dally%20Family%20Trust%20%26%20Julia%20McIlraith&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D>

And

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E5%20Rezone%20%2D%20Prebbleton%2FSubmitters%20rebuttal%20evidence%2FDPR%2D0488%20Dally%20Family%20Trust%20%26%20R%20%26%20J%20McIlraith&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7>



Figure 5: Preferred rural residential locations, Selwyn Rural Residential Strategy 2014

The officers report on our PDP submission was that it was unable to support our LLR rezoning request because the site is not a preferred rural residential area in the RRS 2014 and Policy 6.3.9 of the Canterbury Regional Policy Statement (CRPS) which only provides for rural residential development where in an approved rural residential strategy. But the RRS is absolutely out of date and does not form an appropriate planning framework or basis for guiding the location or form of future LLR areas.

The Spatial Plan will become a guiding document for urban growth of Greater Christchurch for the next 50 years and beyond. It needs to properly consider the housing (and business) needs of townships and their surrounds. In the absence of this work being undertaken by the Council, urban design evidence (Nicole Lauenstein) in support of our submission proposed an urban growth strategy for Prebbleton as shown on Figure 6 below.

Our site is identified as part of a green buffer around Prebbleton township, in a 'left over' area between the current urban boundary and the Southern Motorway. It is described as offering a generous and spacious layout allowing for the inclusion of larger clusters of trees creating a residential environment akin to rural living but to a scale that ensures efficient use of land.

The Lauenstein recommended urban paths (westward to Shands Road and south eastwards along Trices Road) continues to contribute to a compact urban form encapsulated within a landscaped buffer which retains a clear start and finish to Prebbleton village and a separation from Christchurch City. This strategy takes account of the Prebbleton Structure 20 which seeks retention of a village character and separation from Christchurch City.

NB. The separation from Christchurch City is now so narrow that it is no longer realistic or appropriate. This is recognised on Map 2 which identifies a possible greenbelt between Lincoln and Prebbleton rather than between Prebbleton and Christchurch City.

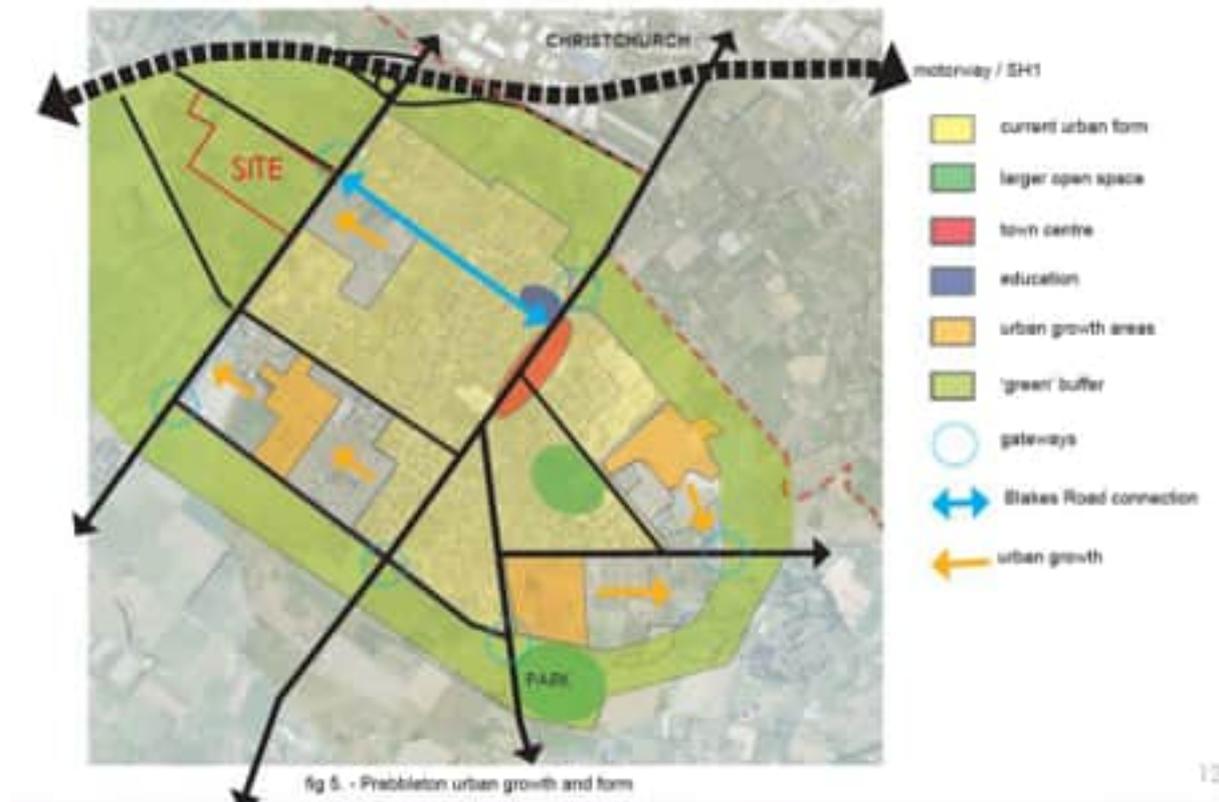


Figure 6: PDP urban design evidence for McIraith and others

Prebbleton is also ideally suited for significant urban growth, given its proximity to transport routes (road and active transport) and major employment areas at Hornby, Rolleston and Lincoln and central Christchurch. In this case, the land west of Shands Road to the Southern Motorway would also be suitable for full urban residential development.

Large Lot Residential Development

The Spatial Plan which will be implemented as part of the CRPS review in 2024 and needs to recognise and address the full range of housing needs, including provision for LLR development.

While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of District towns and Christchurch City and within walking and cycling distance of local schools. They do not want the only other available option – a 4 ha lifestyle block.

LLR sites are large enough to accommodate multi-generational living opportunities – and contribute to housing affordability whereby younger or retired family members can be accommodated in minor residential units and provide mutual support (child care, care of elderly family members etc). Apartments, terraced houses and townhouses can't.

LLR development is not a 'luxury item' or a form of urban development which cannot support a low carbon future with reduced greenhouse gas emissions. At Prebbleton, our land is just 1.5km from the town centre, primary school and cycleway link into the city via SH76, and ½ km from the Southern Motorway on ramp. It meets all the criteria for a well functioning urban environment as set out in Policy 1 of the NPS-UD.

LLR development is not a frivolous discretionary item in land development and housing choice - a well-planned, well located and properly serviced low density residential environment has much to offer urban environments. They can be tactically used to provide shape and edge to urban areas, they can provide a mass of amenity different from (and potentially complementary to), but no less legitimate in urban outcome terms, to full urban residential development.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes in principle but see comments below re the Blue – Green network.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

Do you support the concept of a Greenbelt around our urban areas?

No. The concept of a 'green belt ' does not appear to be well understood. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the Canterbury Regional Policy Statement (CRPS). Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to

the inflexibility a green belt approach creates. This situation is contrary to the responsive planning expectations contained in the NPS-UD

We agree that if there is to a Greenbelt in the vicinity of Prebbleton, it should be between Prebbleton and Lincoln, not between Prebbleton and Christchurch City. As noted above, the separation from Christchurch City and Prebbleton is now so narrow that it is no longer realistic or appropriate to retain a 'rural' separation here.

A Greenbelt separates and so by definition is located in close proximity to urban areas. It should accommodate low density LLR living opportunities sites in the 1000m² + size range which can contribute to an open spacious character, in contrast to the more dense urban areas.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

Do you agree with the draft spatial strategy outlined above?

No – there need to be amendments to as set out below (shown in bold and underlined or ~~strike out~~)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions compared to other more realistic urban form scenarios i.e a combination of consolidation and dispersed growth around existing townships – the 'urban villages' approach discussed above.

Do you have any feedback on other aspects of the Draft Spatial Plan?

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households
 (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will be not give effect to higher planning documents, specifically the NPS-UD.

Highly Productive land and the NPS-HPL

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the land adjoining the existing urban areas in GC is already highly

fragmented into 4 ha blocks which are too small to be highly productive. This is acknowledged

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for GC.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment; and in the context of some very significant and immediate environmental challenges (in particular climate change); and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Appendix A: Strategic Urban Form Context – Comparison between ‘distributed village community’ and compact city approach to future urban growth of Greater Christchurch

Christchurch has a base urban form reflected in the spatial plan diagram. This underlying urban form has evolved since its settlement:

1. Central core based on Hagley Park, four belts and central business/ services/ retail core.
2. Urban villages (old boroughs).
3. Concentric form constrained by the coast to the east, hills to the south and Waimakariri River to the north.
4. A hub and spoke connection network connecting all parts of Chch. This radial network form is evident in the spatial plan diagram.
5. The hub and spoke foundation has survived decisions over the years (pre-earthquake) to provide new hubs of social/ business enablement/ connection
 - a) A hierarchy of shopping centres dominated by the big hubs of Northlands, Shirley, Linwood, Riccarton
 - b) Decentralisation of employment that was originally based around the rail and Sydenham, Addington, Woolston, central city and dispersed to Blenheim Rd, Moorhouse Ave, airport, Hornby and Belfast
 - c) Concentration of hospital services at Hagley, Princess Margaret and St Georges in Merivale.
 - d) Proliferation of commercial and social services out in to residential areas.
 - e) Movement of the University out to Ilam.

Prebbleton has been part of the hub and spoke configuration proving a way point to Lincoln. As a small rural village it has always had a core servicing/ community services component.

One of the overarching directions of the GCSP is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

That direction has merit at a strategic level but its proposed implementation in the GCSP is unnecessarily restricted to just the central spine which actually only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main centres linking up nodes that have little functional relationships or inter-dependencies and movement along the spine or between nodes on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine. It caters for only a part of the bigger Chch community (if the extent of orange to grey on the spatial plan is a guide).

Conventionally strategic plans adopt a framework based on:

1. Work
2. Play
3. Live

The interaction between these and the interplay between them is what creates and sustains a community. It has a focus on localism as community well-being is better derived from near at hand relationships not costly (time and resources) travel.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the “village communities’ that are present and well established in Chch. These urban villages need to be supported and enabled to thrive and grow to support the social/ community and business services that are there. These areas need support and planning investment to secure a sustainable future contributing to the growth targets and housing/ business/ community facility needs of the whole city. There needs to be a focus on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities.

These village communities will:

- a) Provide local opportunities at scales that may be more better contribute to the concentric urban form of Chch (clearly evident in the spatial plan diagram), supporting a well-functioning urban area (which is more than just a spine and large urban nodes on that spine; it is all that area encircled by the hatched green line on the spatial plan); and
- b) support a more responsive and flexible growth option as opportunities are spread across a spectrum of socio-economic areas, of different age and condition housing stock; and
- c) create growth and intensification options in places where core services and facilities are already present and do not need to be created; and
- d) provide a distributed system supporting growth and intensification reducing the risks associated with concentration of assets and community investment in to fewer options; and
- e) ensure resilience by many points of growth and development drawing on existing patterns of development and so not exposing the overall goal to implementation risks from fewer locational options and a limited form of intensification and growth.

The fundamental form of Chch is almost fixed. The Spatial Plan should be supporting a 50 year outcome that supports and reinforces the distributed community form and not try to create a new form on a set of considerations driven and dominated by public or mass

transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

Prebbleton has an important role to play in a “village community” future or a distributed intensification/ development scenario. It can contribute to community well-being in the draft central spine model too, but less effectively.

Prebbleton has a role that should be recognised and enabled in the GCSP in support of:

1. *Opportunity #4: Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs*
2. *Opportunity #6: prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.*
3. *Key move #2: A strengthened network of urban and town centres*

But to be future focussed, and to build on the existing community and private assets of Prebbleton, the Spatial Plan should provide an enabling policy framework that supports a sustainable urban form for Prebbleton

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Trices Road Rezoning Group

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

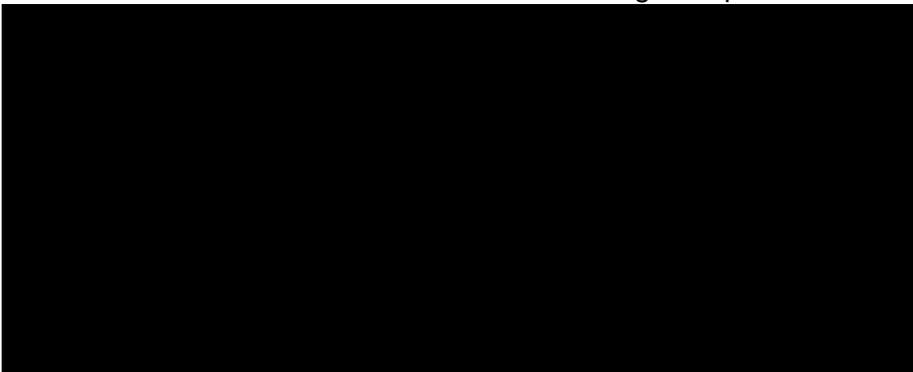
File
2090final SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN Trices Rd Rezoning Group



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Trices Road Rezoning Group



Contact Person: Fiona Aston

Decision sought

Maps 2 and 14

The submitter supports the Draft Greater Christchurch Spatial Plan (Spatial Plan) as notified, including but not limited to inclusion of the Plan Change 72 (PC72) land at Trices Road, Prebbleton ('the Site', as shown on **Figure 1** below) as an 'approved plan change not yet operative' area on Maps 2 and 14. The 'approved plan change not yet operative' classification is presently accurate, however following release of the Environment Court's decision on PC72 and/ or the Selwyn District Council's Variation decision(s) this will change and more accurately be classified as 'Future urban development areas and private plan changes made operative and available for development' or 'existing urban area'. The submitter seeks to ensure that the Site is afforded the appropriate classification on Maps 2 and 14 (or any maps in substitution thereof) in the final form Spatial Plan.

Implementation

The submitter seeks to amend the Spatial Plan monitoring and review provisions to comply with the mandatory National Policy Statement – Urban Development (NPS-UD)

requirements i.e. the Implementation Plan must be updated annually and the Spatial Plan (which is a NPS-UD Future Development Strategy (FDS)) must be reviewed every three years, and any other alternative, additional or consequential amendments which give effect to the intent of this submission.

Background

The submitter has participated in the following planning processes:

1. A submission seeking the rezoning of the Site from Rural: Inner Plains to General Residential under the proposed Selwyn District Plan (PSDP);
2. A private Plan Change application (PC72) seeking Living Z zoning under the operative Selwyn District Plan (ODP);
3. A submission supporting Medium Density Residential zoning for the Site in accordance with the Resource Management Enabling Housing (and other matters) Amendment Act 2021 (Housing Enabling legislation) under Variation 1 to the PSDP; and
4. A submission in support of a Variation to PC72 which seeks to incorporate the Medium Density Residential Standards (MDRS) into PC72 under the ODP.

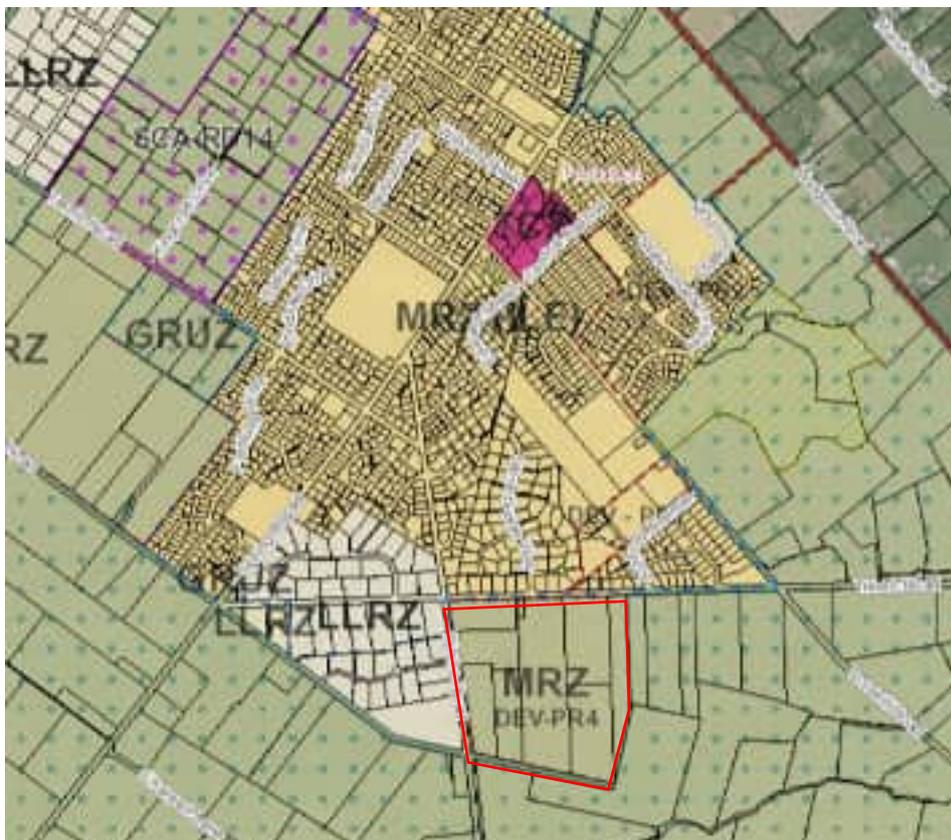


Figure 1: Variation 1 to the PSDP planning map – Trices Road Rezoning Group land outlined in red.

Current Situation

PC72 has been approved (April 2022) but is subject to an Environment Court appeal by the Drinnans, submitters on PC72. The only outstanding matter relates to the inclusion of the Drinnan land (2.2ha) within PC72. The appropriateness of the Living Z zoning of PC72 is beyond challenge. The appeal was heard in June 2023 and a decision is expected by September 2023. The appeal is the reason that PC72 is not yet operative.

Decisions on the PSPD and Variation 1 submissions will be issued on or before 20 August 2023, in accordance with the Housing Enabling legislation. The Environment Court decision, together with the Selwyn District Council decisions on the PSDP and Variation(s) will precede hearings on the Spatial Plan.

Spatial Plan Monitoring and Review

The Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment within the Spatial Plan is necessary to ensure it meets the minimum requirements for a FDS as directed in the NPS-UD. The Spatial Plan needs to be a 'living' and flexible document to keeping apace and to be responsive to urban growth needs in a fast-changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change). The Spatial Plan is intended to inform, direct focus and support costly and uncertain public transport initiatives including Mass Rapid Transit.

Areas identified for future urban growth and development on Maps 2 and 14 must reflect development on-the-ground and be responsive to the multiple planning processes underway in the Greater Christchurch area. It is important that the maps included in the final form Spatial Plan are up to date and align with decisions issued on ongoing district planning processes, in this case the PSDP and related Variation(s).

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Miles Premises Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

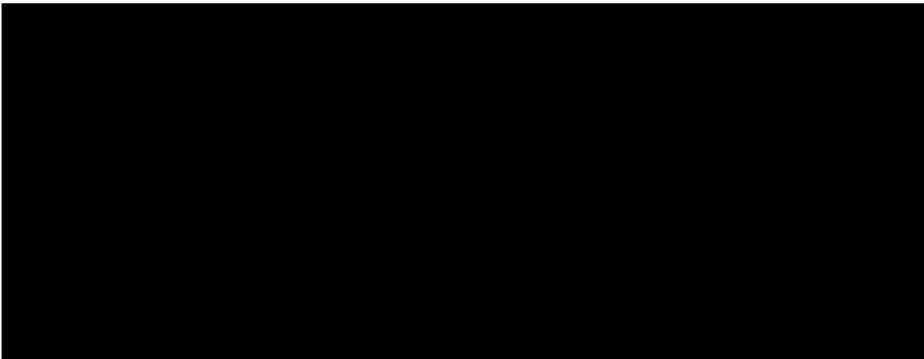
File
1194final GCSpatial Plan submission - Miles Premises Ltd



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Miles Premises Ltd



Contact Person: Fiona Aston

Hearing Options

We do wish to be heard in support of our submission. If others make a similar submission, we may consider presenting a joint case with them at the hearing.

Introduction & Background

Miles Premises Ltd own land at 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road ('the Site') which is zoned Industrial Park (Memorial Avenue) Zone and is affected by the operative Christchurch International Airport (CIAL) airport noise contours (see Figures 1 and 2 below).

We have lodged a submission and further submissions on Proposed Change 14 to the Christchurch District Plan seeking an amendment to the Airport Noise Qualifying Matter (ANQM) such that it only apply to areas within the 57 dBA Ldn airport noise contour; is based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths; and that the Annual Average rather than Outer Envelope contour apply. The submission also seeks removal of the Low Public Transport Accessibility Qualifying Matter (LPTAQM), in particular as it applies to north west Christchurch; and rezoning the current urban zoning of 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road to allow the full range of business and

related activities (industrial, office, accommodation, health, community, entertainment, recreation etc) and/or rezoning it in full or part Future Urban Zone or Medium Density Residential; in all cases with no restrictions in activity type or standards due to airport noise effects.

Memorial Premises Ltd development intentions for their land is to focus business activity along the Memorial Avenue portion of the Site, and residential activity towards Avonhead Road. There is scope for medium/higher density residential development and potentially mixed use development.

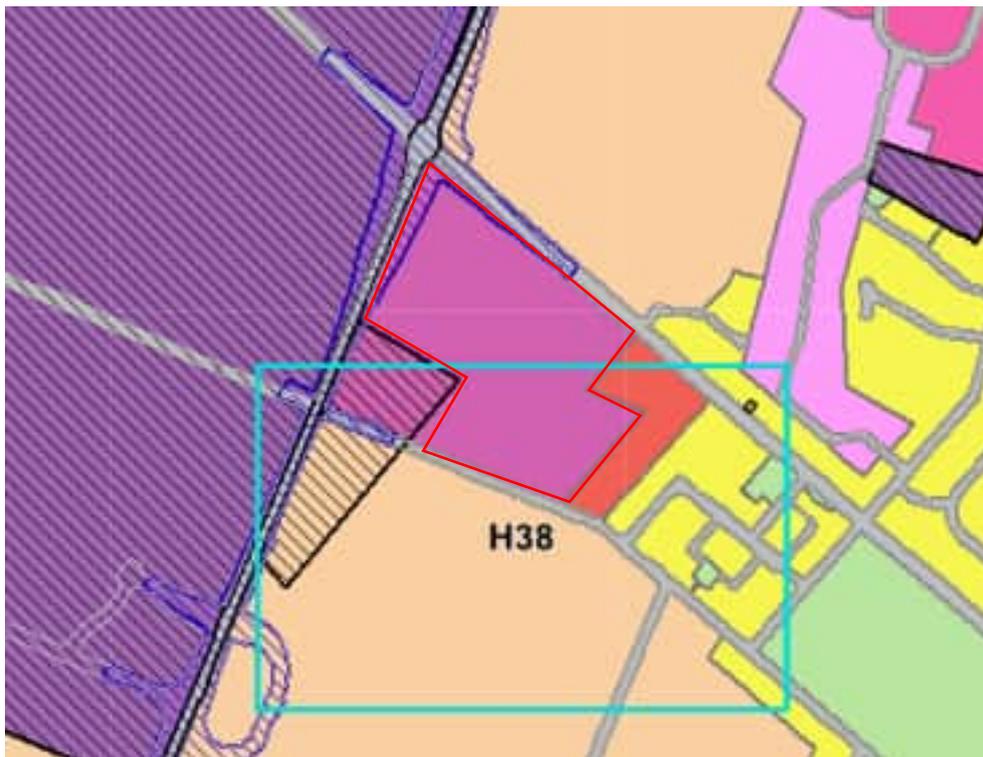


Figure 1: Operative Christchurch District Plan planning map – Site outlined in red
Legend:

Zone	
CL	Commercial Local Zone
CO	Commercial Office Zone
IC	Industrial General Zone
IP	Industrial Park Zone
OCP	Open Space Community Parks Zone
DWM	Open Space Water and Margins Zone
RGA	Residential Guest Accommodation Zone
RS	Residential Suburban Zone
RuUF	Rural Urban Fringe Zone
RuW	Rural Waimakariri Zone
SPA	Specific Purpose (Airport) Zone
SPC	Specific Purpose (Cemetery) Zone
SPS	Specific Purpose (School) Zone
	Transport Zone



Figure 2: Operative Christchurch District Plan planning maps showing airport noise contours. Appx location of Site outlined in red

Legend:



Relief Sought (see also Response to Online Questions below)

We seek the following amendments to the Draft Greater Christchurch Spatial Plan (the Spatial Plan), and any other additional, consequential or alternative amendments which reflect and give effect to the intent of our submission and our interests:

Map 5: Areas to protect and avoid, Map 9 Strategic infrastructure

Amend Maps 5 and 9 such that the Christchurch Airport Noise Control Zone (CANCZ) apply to land within the 57 dBA airport noise contour, such contour to be based on the methodology adopted in the Christchurch Airport Remodelled Contour Independent Expert Panel Report (June 2023) except that it be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths and not ultimate runway capacity; and that the Annual Average not Outer Envelope contour apply. Maps 5 and 9 should also show the 65 dBA airport noise contour, based on the same assumptions and methodology as stated above for the 57 dBA contour, and the Spatial Plan should clarify that sensitive activities (as defined in the Christchurch District Plan, or similar) are permitted between the 57-65 dBA contour, subject to appropriate acoustic insulation, and that no noise mitigation measures are required outside the 57 dBA airport noise contour.

Reason:

The Map 5 and 9 Christchurch Airport Noise Control Zones show the operative CIAL airport 50 dBA and 55 dBA airport noise contours. These are now out of date. The amended contours as recommended by the Independent Expert Review Panel are based on the most up to date information and best practice, but do not make recommendations regarding the

appropriate contour to use for noise control purposes, and only model future airport growth projections based on ultimate runway capacity (as per their terms of reference).

The amended CACNZ sought in this submission is consistent with international best practice and NZS 6805:1992, Airport Land Use Management and Land Use Planning (NZS 6805) and is the most appropriate way to achieve the purpose of this Act having regard to the costs, benefits and risks associated with alternatives.

Protecting strategic infrastructure

Appropriate measures should be applied ~~Urban development should be avoided~~ around strategic infrastructure to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network (see Map 9).

Reason:

Consistent with Christchurch District Plan Change 5E decision which requires acoustic insulation for sensitive activities where noise levels exceed 55 dBA (railway noise) and 57 dBA (road noise). The same approach i.e. managing noise effects on sensitive with acoustic insulation requirements should apply to airport noise. This is also the current operative District plan requirement for development subject to airport noise.

Maps 2 and 14

We support a core public transport (PT) route between the Central City and the Airport via Canterbury University (or a more direct route via Fendalton Road and Memorial Avenue), as shown on Maps 2 and 14 below.



Figure 3: Maps 2 and 14 showing core PT routes in blue.

A strengthened network of urban and town centres

We seek amendments to the Spatial Plan which identify the potential for further business and residential growth in the vicinity of the Airport, and for medium and high density residential development in close proximity to core PT routes as follows (or similar) – additions **underlined and in bold** and deletions ~~strike out~~:

Riccarton corridor **and Airport corridor** Hagley Park to Upper Riccarton **and Airport**

The opportunity is to develop the currently retail orientated areas of the Riccarton corridor for commercial development and business investment. There is the opportunity to extend knowledge-intensive services, high value jobs and innovative activity from the Central City, linking with the University of Canterbury, along the corridors to the Airport; supported by high frequency public transport, and over time, mass rapid transit.

There is also the opportunity to incentivise and provide for multi-storey townhouses and apartments, achieving average density yields ranging between 70 and 150 households per hectare. (p 35)

Table 2: Sufficiency of housing development capacity to meet projected demand (2022 – 2052)

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Decisions on recent Selwyn private plan change requests consistently agreed with evidence that the Council's housing and business capacity assessments underestimated housing and

business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlines Tables 2 and 3. They should be revised to reflect best practice and ensure that they comply with the NPS-UD.

Response to Online Form questions (where relevant to Miles Premises Ltd and our interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere, including residential development within the 57 dBA airport noise contour, as sought in our submission.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies for many first time home buyers. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near

stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

There needs to be a balance between and ample provision for greenfield development and intensification, including our land (the Site) in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an ageing population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses future development and investment around the MRT corridor and core PT corridor. Our land ('the Site') is located on a core PT corridor (and potential future MRT route) and is an ideal location for residential development, including potential medium/high density residential development and mixed development. Its development for residential purposes will contribute to a well functioning urban environments.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions. Further residential development opportunities, including our Site need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation

Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Red Spur Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
1138final GCPS Submission inc Appx - Red Spur Ltd



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Red Spur Ltd



Contact Person: Fiona Aston

Hearing Option

I do wish to be heard in support of this submission. If others are making a similar submission, I may consider presenting a joint case with them at the hearing.

Relief Sought (see also 'Response to online submission form questions' below)

Amend Maps 2 and 14 to correctly show the existing urban area at Redmund Spur and Upper Kennedys Bush (see Figure 1 below or area to be amended); and to show an extension to the existing urban area to include land linking Upper Kennedys Bush and Redmund Spur as shown on Figures 2 and 3 below; and other extensions to the Redmund Spur residential development where urban development is proposed, including as shown on Figure 4 below.

Any alternative, additional, consequential or other relief which gives effect to the intent of my submission and my interests.

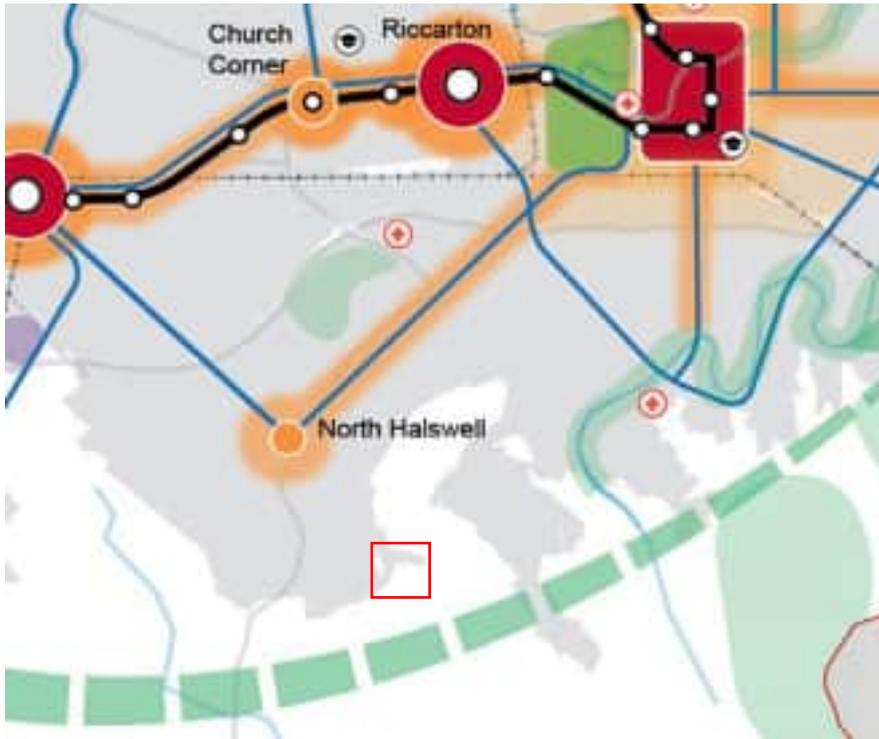


Figure 1: Amendments Sought to Maps 2 and 14 – area outlined in red to be amended to correctly show the Upper Kennedys Bush and Redmund Spur existing urban areas and to show an extension to the existing urban area to include land linking Upper Kennedys Bush and Redmund Spur as shown on Figures 2 and 3 below.



Figure 2: location of proposed urban residential rezoning linking Redmund Spur and Kennedys Bush Road shown as blue oval. Existing residential zoned areas shown in red.

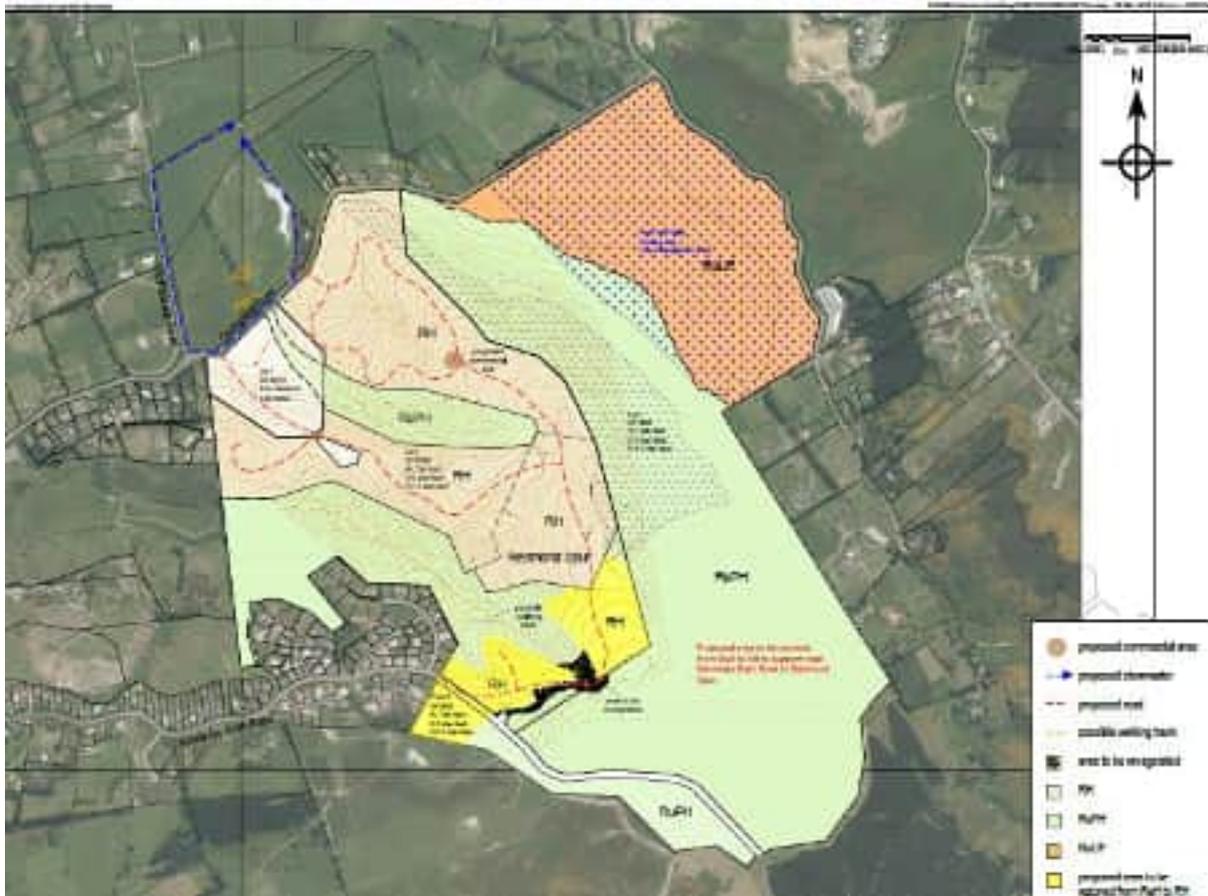


Figure 3: Proposed urban residential extension linking Redmund Spur and Upper Kennedys Bush existing urban areas



Figure 4: Amend Maps 2 and 14 to enable urban development of land beyond the eastern boundary of the Redmund Spur existing residentially zoned land – include areas outlined in black which are
Astons Consultants Resource Management and Planning

currently outside the urban zoned area, as within the urban zoned area, and show as 'existing urban area' on Maps 2 and 14.

Reason:

Creating a roading link between the Redmund Spur and Upper Kennedys Bush subdivisions is essential to ensure appropriate emergency access is available, including for extreme events such as future earthquakes, and to achieve best practice urban design principles of connectivity and integration.

The challenges and dangers associated with lack of alternative road access were highlighted by the recent Canterbury earthquakes, in particular the major February 2011 event where the epicentre was at Heathcote on the lower Port Hills. The neighbouring suburb of Clifton was completely 'cut off', apart from limited 4WD access across the adjoining rural Richmond Hill farmland. Evans Pass Road between Sumner and Lyttelton was closed for more than 8 years after the earthquake.

The proposed zoning extension comprises approximately 12 ha of land, sufficient to accommodate enough residential sections to fund the roading link, with zoning boundaries relating to the topography and avoiding prominent visual areas.

The roading link is essential to facilitate a basic urban design, which includes the principles of integration and connectivity, and to provide alternative emergency access. It will also increase the effective catchment for future hill public transport services, including bus services by linking two neighbouring hill suburbs. The intention is to avoid a 'repeat' of other hillside residential subdivisions, such as Westmorland, which is a substantial residential subdivision with a sole vehicle entry and exit point, along Cashmere Road.

The proposed minor additions to the Redmund Spur urban area (eastern edge) better relate to the topography of the land and enable development of suitable residential building sites.

Introduction and Background

Red Spur Ltd (Red Spur), owns land at Redmund Spur, Halswell. An associated company has also developed Quarry Hill which is a neighbouring upper Kennedys Bush subdivision, comprising 100 sections, with lot sizes in the 850m² to 2400m² size range, approved under the previous City Plan LHA zone provisions (minimum net site area 850m², minimum average 1500m²).

The two subdivisions are separated by a band of Rural H zoned land also owned by associated interests and part of a larger balance Rural H zoned area (totalling appx 250 ha). The Halswell Quarry Park is on the west boundary of the properties.

Red Spur is now developing Redmund Spur - see <https://www.redmundspur.co.nz/>. Stages 1-5 (85 lots) are now complete or consented with lot sizes in the 471m² to 4830m² range.

Operative Christchurch District Plan

Both Upper Kennedys Bush and Redmund Spur are zoned Residential Hills in the Operative Christchurch District Plan.

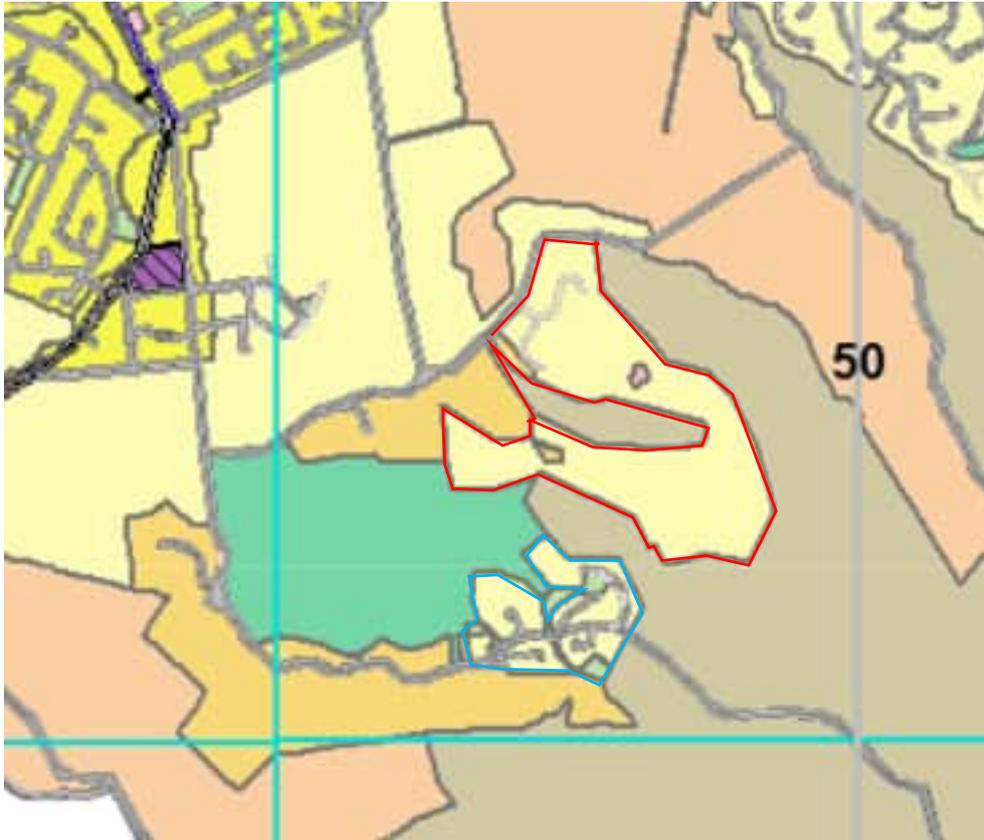


Figure 2: Zoning Map – Operative Christchurch District Plan

Redmund Spur outlined in red; Upper Kennedys Bush outlined in blue.

Light yellow – Residential Hills; Mustard yellow – Residential Large Lot

Redmund Spur is subject to a 'Mixed Density Overlay' (MDO) which specifies

- The maximum number of allotments shall be 400.
- A minimum of 30% of sites shall have a minimum net site area of 1500m²

There is no minimum lot size.

The MDO takes its 'cue' from the existing Cashmere Hills suburb which is a very attractive high amenity suburb. It provides for a wide range of section sizes and housing types, ranging from townhouses and apartments to substantial homes on larger sites, with a sufficient proportion of larger sites to create a 'leafy' feel. A local neighbourhood centre is zoned at Redmund Spur positioned in a similar position at a local roads intersection with north facing

views to plains and Alps to the café cluster, gift shop, florist and pilates studio at the Dyers Pass/Hackthorne Road intersection on Cashmere Hill.

Redmund Spur is particularly suited to some medium density development because includes substantial areas of flatter north facing land suitable for high density development.

Christchurch District Plan Change 14

PPC14 proposes 'upzoning' all of the existing residential zones in the Christchurch District Plan to Medium Residential, except for the Large Lot Residential and Small Settlement Zones and where Qualifying Matters apply.

PPC14 proposes to 'downzone' Redmund Spur to Large Lot Residential, but retain the existing MDO development standards. However, neighbouring Upper Kennedys Bush is 'upzoned' to MR.

We have lodged a submission on PC14 which:

- Opposes the 'downzoning' of Redmund Spur to LLR;
- Seeks RH zoning if the Low Public Transport Accessibility Qualifying Matter (LPTA-QM) is retained, subject to the Redmund Spur Precinct Overlay (RSPO) which enables 15% of vacant lots to be in the 400-650m² size range; or otherwise MR, subject to the same RSPO.

Strategic Urban Form Context – Why a distributed 'village community' rather than the proposed compact city approach to future urban growth is needed

Red Spur Ltd opposes the Draft Greater Christchurch Spatial Plan 'compact city' approach which concentrates future urban growth along the proposed MRT and core Public Transport corridors and at and around major centres. It is unrealistic and inappropriate given the existing urban form of Greater Christchurch.

A distributed 'village community' approach which builds growth around existing distributed urban village communities, including Redmund Spur and Kennedys Bush is needed.

Greater Christchurch has a concentric urban form constrained by the coast to the east, hills to the south and Waimakariri River to the north. It is internally connected by a radial hub and spoke network linking all parts of Greater Christchurch. This evident on Maps 2 and 14.

The hills suburbs including Redmund Spur and Kennedys Bush are part of the hub and spoke configuration, with the proposed neighbourhood centre at Redmund Spur providing a

future community focal point and neighbourhood services in support of a walkable community.

One of the overarching directions of the Spatial Plan is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

This direction has merit at a strategic level but its proposed implementation in the Spatial Plan is unnecessarily restricted to just the central spine which actually only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main centres linking up nodes that have little functional relationships or inter-dependencies. Movement along the spine or between nodes/centres on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the ‘village communities’ that are present and well established in Christchurch. These urban villages need to be supported and enabled to thrive and grow to support the social, community and business services that are there. The focus should be on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities.

The fundamental form of Greater Christchurch is almost fixed. The Spatial Plan should be supporting a 50 year outcome that supports and reinforces the distributed community form. It should not try to create a new form on a set of considerations driven and dominated by public or mass transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

To be future focussed, and to build on the existing community and private assets of Redmund Spur and Kennedys Bush, the Spatial Plan should provide an enabling policy framework that supports a sustainable urban form for these hill suburbs. That framework should specifically provide for growth option as set out in this submission.

Further explanation and reasoning for the preferred distributed ‘village community’ urban form is provided in **Appendix A**.

Responses to Online Submission Form Questions

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future public transport (PT) system including Mass Rapid Transit (MRT) proposal which may never ‘see the light of day’ i.e. there is no funding in place and no approved business case in

support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and does not justify the very large investment required for MRT (\$3-\$4 billion to build).

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Agree in part.

Apartments and terraced housing are suitable in a wide range of urban settings, including the Redmund Spur hill suburb. Redmund Spur is particularly suited to medium density housing because it includes substantial areas of flatter north facing land suitable for high density development. The Spatial Plan should not focus these typologies just around urban centres and along PT corridors. They should be enabled in a wider range of urban settings, including at Redmund Spur. This will provide greater housing choice, support mixed age communities, enable people to age in place as well as offering a smaller more affordable housing choice than many of the larger homes which typify most Christchurch hill suburbs.

It should also be recognised that apartments and terraced housing are not necessarily more affordable than other housing typologies on flat land or along core PT corridors including MRT. As mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification.

A key reason why Rolleston has grown so rapidly post earthquakes is because it has met the very high market demand for quality affordable housing, and the local council has generally been enabling of development, including a flexible approach towards provision of required infrastructure. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

There needs to be ample provision for intensification and greenfield development in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

This requires a balance between housing intensification and greenfield development. The Spatial Plan does not achieve this. The Spatial Plan is proposed as the Future Development Strategy as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the Spatial Plan does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There will be a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an aging population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing, including medium density 'infill' and greenfield development, including some provision for lower density/large lot residential development, retirement villages and medium density living at Redmund Spur.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times, including at Prebbleton. This is totally contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

Limitations of compact urban form

The 'compact urban form' proposed focuses far too much future development and investment around the MRT corridor – rather than other urban centres and transport corridors, and other locations which will contribute to well functioning urban environments.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'.

See also **Appendix A** – comparison between 'distributed village community' and compact city form approaches to urban growth and discussion above.

Urban consolidation

The Spatial Plan needs to support urban consolidation, rather than a total focus on a compact urban form, with intensification centred along a possible future MRT corridor and a few major centres. There are gaps in the existing urban form in a number of existing urban

areas, where urban development needs to be enabled, to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with existing good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c). This includes land between Redmund Spur and Upper Kennedys Bush existing areas, which should be rezoned for urban purposes to facilitate a road (and active transport) connection between these two hill suburbs.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

In part subject to comments and requested amendments as set out below and under the Blue – Green network.

Amend Spatial Plan as below (or similar) – additions shown in **bold and underlined** and deletions as ~~strike out~~.

3.1 Avoid **Consider effects of** development of **on** areas with significant natural values

.. Greater Christchurch has many ~~outstanding~~ **valued** environmental areas, **natural** features and **natural** landscapes (see Map 10). **Impacts on such areas must be considered where urban development is proposed and measures, including mitigation or environmental compensation or offsetting may be applied in appropriate circumstances.** ~~Urban development must be focused away from areas with significant natural values..~~

The Port Hills, including rural land around the existing Redmund Spur and Upper Kennedys Bush residential zoned areas are not outstanding. Similarly, other environmental areas in Greater Christchurch whilst valued, are not outstanding.

Map 10 – delete the proposed urban residential extension linking Redmund Spur and Upper Kennedys Bush existing urban areas (as identified on Figures 2 and 3) and other rural zoned areas adjoining the boundary of the current Redmund Spur residentially zoned which are suitable for urban development from the area shown on Map 10 as ‘protected places, landscapes and features’.

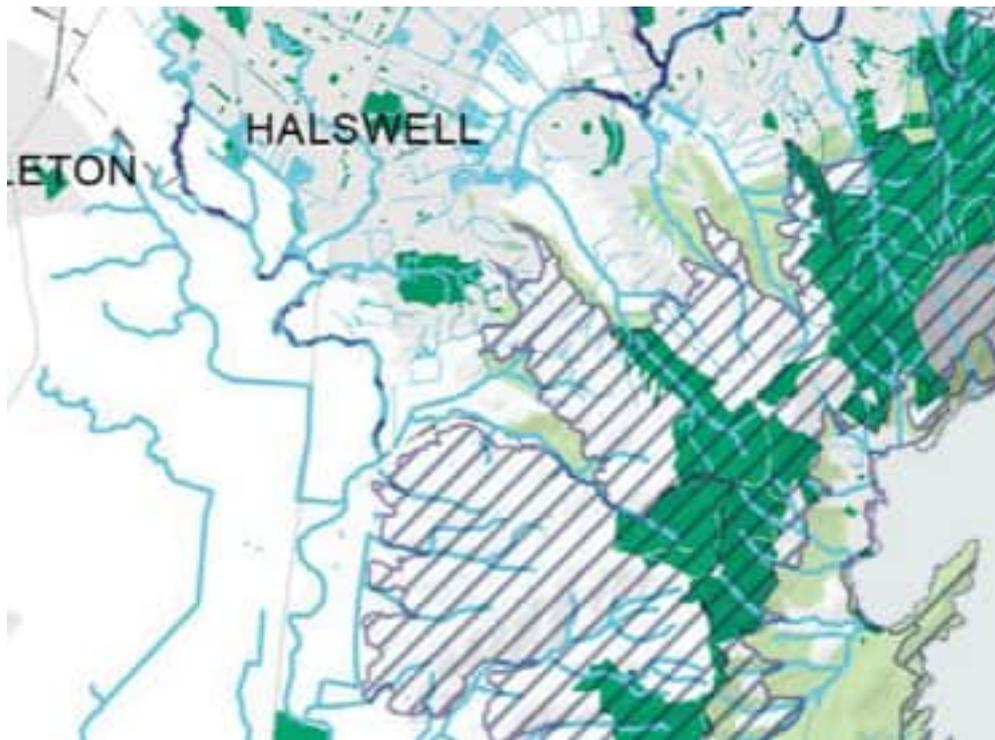


Figure 3: Map 10 Environmental Areas and Features – amend to remove the land

Amend Map 10 below to read ~~Protected~~ **Valued** Places, Landscapes and Features (or similar)



One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

Do you support the concept of a Greenbelt around our urban areas?

No. The concept of a 'green belt' does not appear to be well understood. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the Canterbury Regional Policy Statement (CRPS). Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to

the inflexibility a green belt approach creates. This situation is contrary to the responsive planning expectations contained in the NPS-UD

A Greenbelt separates and so by definition is located in close proximity to urban areas. If it is retained in the Spatial Plan, it should accommodate low density residential (LLR) living opportunities sites in the 1000m² + size range which can contribute to an open spacious character, in contrast to the more dense urban areas.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

Do you agree with the draft spatial strategy outlined above?

No – there need to be amendments to as set out below (shown in bold and underlined or ~~strike out~~)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets . However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions

compared to other more realistic urban form scenarios i.e a combination of consolidation and dispersed growth around existing townships – the ‘urban villages’ approach discussed above and in **Appendix A**.

Do you have any feedback on other aspects of the Draft Spatial Plan?

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will be not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the ‘broad locations’ in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immoveable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment; and in the context of some very significant and immediate environmental challenges (in particular climate change); and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Appendix A: Strategic Urban Form Context – Comparison between ‘distributed village community’ and compact city approach to future urban growth of Greater Christchurch

Christchurch has a base urban form reflected in the spatial plan diagram. This underlying urban form has evolved since its settlement:

1. Central core based on Hagley Park, four belts and central business/ services/ retail core.
2. Urban villages (old boroughs).
3. Concentric form constrained by the coast to the east, hills to the south and Waimakariri River to the north.
4. A hub and spoke connection network connecting all parts of Chch. This radial network form is evident in the spatial plan diagram.
5. The hub and spoke foundation has survived decisions over the years (pre-earthquake) to provide new hubs of social/ business enablement/ connection
 - a) A hierarchy of shopping centres dominated by the big hubs of Northlands, Shirley, Linwood, Riccarton
 - b) Decentralisation of employment that was originally based around the rail and Sydenham, Addington, Woolston, central city and dispersed to Blenheim Rd, Moorhouse Ave, airport, Hornby and Belfast
 - c) Concentration of hospital services at Hagley, Princess Margaret and St Georges in Merivale.
 - d) Proliferation of commercial and social services out in to residential areas.
 - e) Movement of the University out to Ilam.

Prebbleton has been part of the hub and spoke configuration proving a way point to Lincoln. As a small rural village it has always had a core servicing/ community services component.

One of the overarching directions of the GCSP is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

That direction has merit at a strategic level but its proposed implementation in the GCSP is unnecessarily restricted to just the central spine which actually only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main centres linking up nodes that have little functional relationships or inter-dependencies and movement along the spine or between nodes on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine. It caters for only a part of the bigger Chch community (if the extent of orange to grey on the spatial plan is a guide).

Conventionally strategic plans adopt a framework based on:

1. Work
2. Play
3. Live

The interaction between these and the interplay between them is what creates and sustains a community. It has a focus on localism as community well-being is better derived from near at hand relationships not costly (time and resources) travel.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the “village communities’ that are present and well established in Chch. These urban villages need to be supported and enabled to thrive and grow to support the social/ community and business services that are there. These areas need support and planning investment to secure a sustainable future contributing to the growth targets and housing/ business/ community facility needs of the whole city. There needs to be a focus on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities.

These village communities will:

- a) Provide local opportunities at scales that may be more better contribute to the concentric urban form of Chch (clearly evident in the spatial plan diagram), supporting a well-functioning urban area (which is more than just a spine and large urban nodes on that spine; it is all that area encircled by the hatched green line on the spatial plan); and
- b) support a more responsive and flexible growth option as opportunities are spread across a spectrum of socio-economic areas, of different age and condition housing stock; and
- c) create growth and intensification options in places where core services and facilities are already present and do not need to be created; and
- d) provide a distributed system supporting growth and intensification reducing the risks associated with concentration of assets and community investment in to fewer options; and
- e) ensure resilience by many points of growth and development drawing on existing patterns of development and so not exposing the overall goal to implementation risks from fewer locational options and a limited form of intensification and growth.

The fundamental form of Chch is almost fixed. The Spatial Plan should be supporting a 50 year outcome that supports and reinforces the distributed community form and not try to create a new form on a set of considerations driven and dominated by public or mass

transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

Prebbleton has an important role to play in a “village community” future or a distributed intensification/ development scenario. It can contribute to community well-being in the draft central spine model too, but less effectively.

Prebbleton has a role that should be recognised and enabled in the GCSP in support of:

1. *Opportunity #4: Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs*
2. *Opportunity #6: prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.*
3. *Key move #2: A strengthened network of urban and town centres*

But to be future focussed, and to build on the existing community and private assets of Prebbleton, the Spatial Plan should provide an enabling policy framework that supports a sustainable urban form for Prebbleton

Appendix A: Strategic Urban Form Context – Comparison between ‘distributed village community’ and compact city approach to future urban growth of Greater Christchurch

Christchurch has a base urban form reflected in the spatial plan diagram. This underlying urban form has evolved since its settlement:

1. Central core based on Hagley Park, four belts and central business/ services/ retail core.
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3. Concentric form constrained by the coast to the east, hills to the south and Waimakariri River to the north.
4. A hub and spoke connection network connecting all parts of Christchurch. This radial network form is evident in the spatial plan diagram.
5. The hub and spoke foundation has survived decisions over the years (pre-earthquake) to provide new hubs of social/ business enablement/ connection
 - a) A hierarchy of shopping centres dominated by the big hubs of Northlands, Shirley, Linwood, Riccarton
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 - d) Proliferation of commercial and social services out in to residential areas.
 - e) Movement of the University out to Ilam.

One of the overarching directions of the GCSP is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

That direction has merit at a strategic level but its proposed implementation in the Spatial Plan is unnecessarily restricted to just the central spine which actually only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main centres linking up nodes that have little functional relationships or inter-dependencies and movement along the spine or between nodes on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine. It caters for only a part of the bigger Chch community (if the extent of orange to grey on the spatial plan is a guide).

Conventionally strategic plans adopt a framework based on:

1. Work
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The interaction between these and the interplay between them is what creates and sustains a community. It has a focus on localism as community well-being is better derived from near at hand relationships not costly (time and resources) travel.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the “village communities’ that are present and well established in Chch. These urban villages need to be supported and enabled to thrive and grow to support the social/ community and business services that are there. These areas need support and planning investment to secure a sustainable future contributing to the growth targets and housing/ business/ community facility needs of the whole city. There needs to be a focus on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities.

These village communities will:

- a) Provide local opportunities at scales that may be more better contribute to the concentric urban form of Chch (clearly evident in the spatial plan diagram), supporting a well-functioning urban area (which is more than just a spine and large urban nodes on that spine; it is all that area encircled by the hatched green line on the spatial plan); and
- b) support a more responsive and flexible growth option as opportunities are spread across a spectrum of socio-economic areas, of different age and condition housing stock; and
- c) create growth and intensification options in places where core services and facilities are already present and do not need to be created; and
- d) provide a distributed system supporting growth and intensification reducing the risks associated with concentration of assets and community investment in to fewer options; and
- e) ensure resilience by many points of growth and development drawing on existing patterns of development and so not exposing the overall goal to implementation risks from fewer locational options and a limited form of intensification and growth.

The fundamental form of Chch is almost fixed. The Spatial Plan should be supporting a 50 year outcome that supports and reinforces the distributed community form and not try to create a new form on a set of considerations driven and dominated by public or mass

transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

The hill suburbs, including Upper Kennedys Bush and Redmund Spur have an important role to play in a “village community” future or a distributed intensification/ development scenario.

Their role should be recognised and enabled in the Spatial Plan in support of:

1. *Opportunity #4: Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people’s day-to-day needs*
2. *Opportunity #6: prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.*
3. *Key move #2: A strengthened network of urban and town centres*

To be future focussed, and to build on the existing community and private assets of Redmund Spur and Upper Kennedys Bush, the Spatial Plan should provide an enabling policy framework that supports a sustainable urban form for these areas, including an urban extension which will enable a roading connection between them in accordance with best practice urban design.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

West Melton Holdings Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

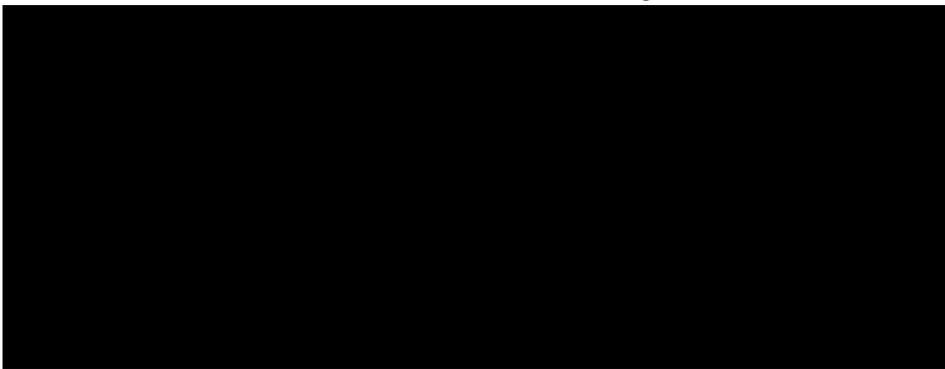
File
2110 final inc Appx SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN West Melton holdings



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: West Melton Holdings Ltd



Contact Person Fiona Aston

We wish to be heard in support of this submission.

Site Specific Matters (see also responses to online questionnaire below)

Decision requested.

Include the area shown on **Figure 1** below within the Existing Urban Area or as a new/expanded residential area on Maps 2 and 14 of the Draft Greater Christchurch Spatial Plan (GCSP).

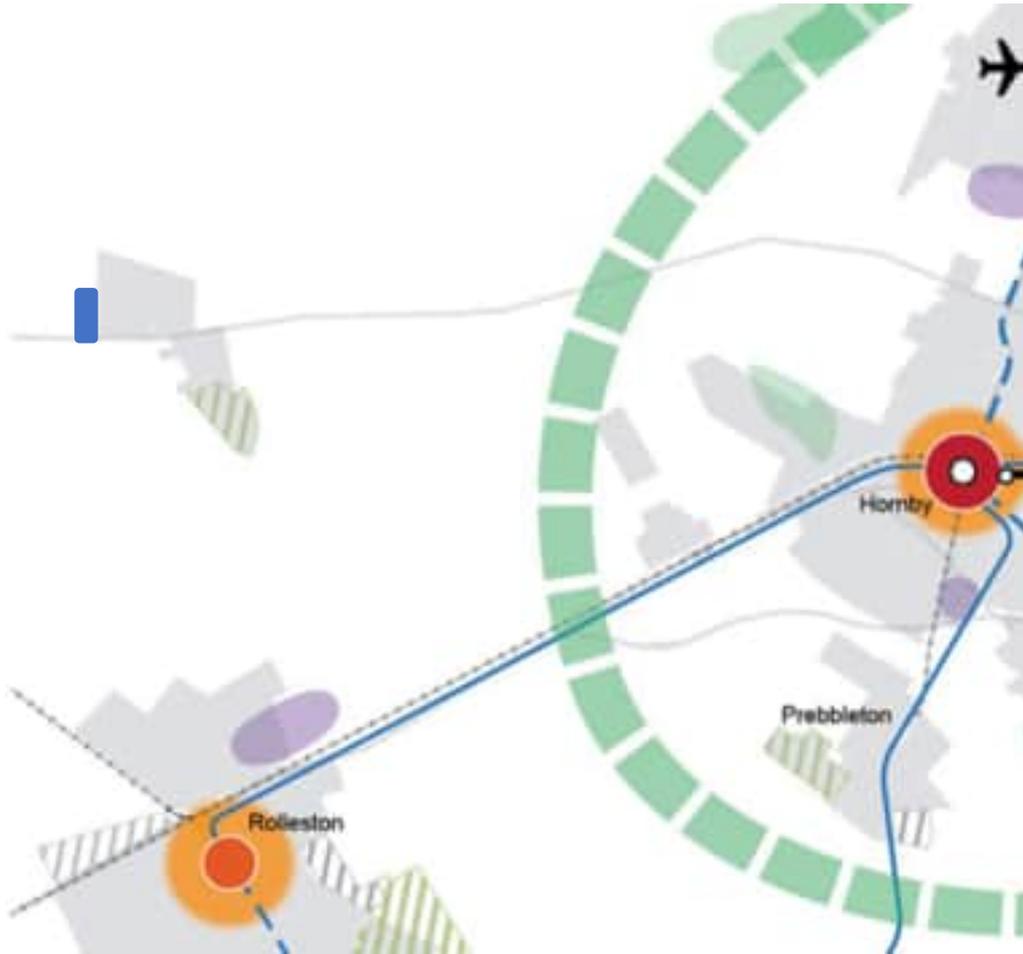


Figure 1: Amendment to Maps 2 and 14 – identify land marked blue at West Melton as an Existing Urban Area or New/Expanding Residential Area.

Or in the alternative, identify the slightly larger area marked blue in Figure 2 as within the Existing Urban Area or as a new/expanded residential area on Maps 2 and 14 of the Draft Greater Christchurch Spatial Plan (GCSP).

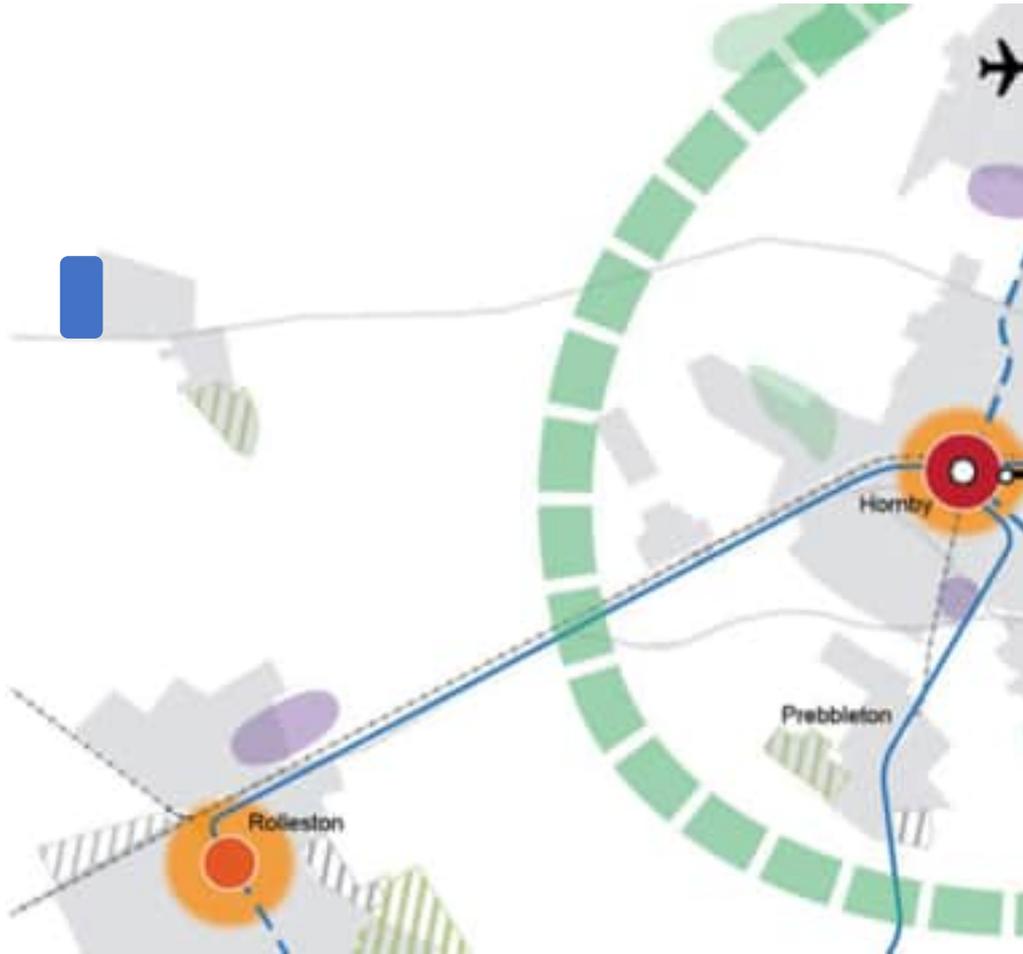


Figure 2: Alternative relief - Amendment to Maps 2 and 14 – identify land marked blue at West Melton as an Existing Urban Area or New/Expanding Residential Area.

Any alternative, additional or other amendments to the Spatial Plan which give effect to the intent of this submission and our interests.

Background - Plan Change 77 and Proposed Selwyn District Plan Submission

West Melton Holdings Limited (WMHL) wishes to develop a retirement village in West Melton on the Site identified in Figure 3 below (12.55ha) in order to respond to the significant projected demand for development of this nature in the Greater Christchurch area.

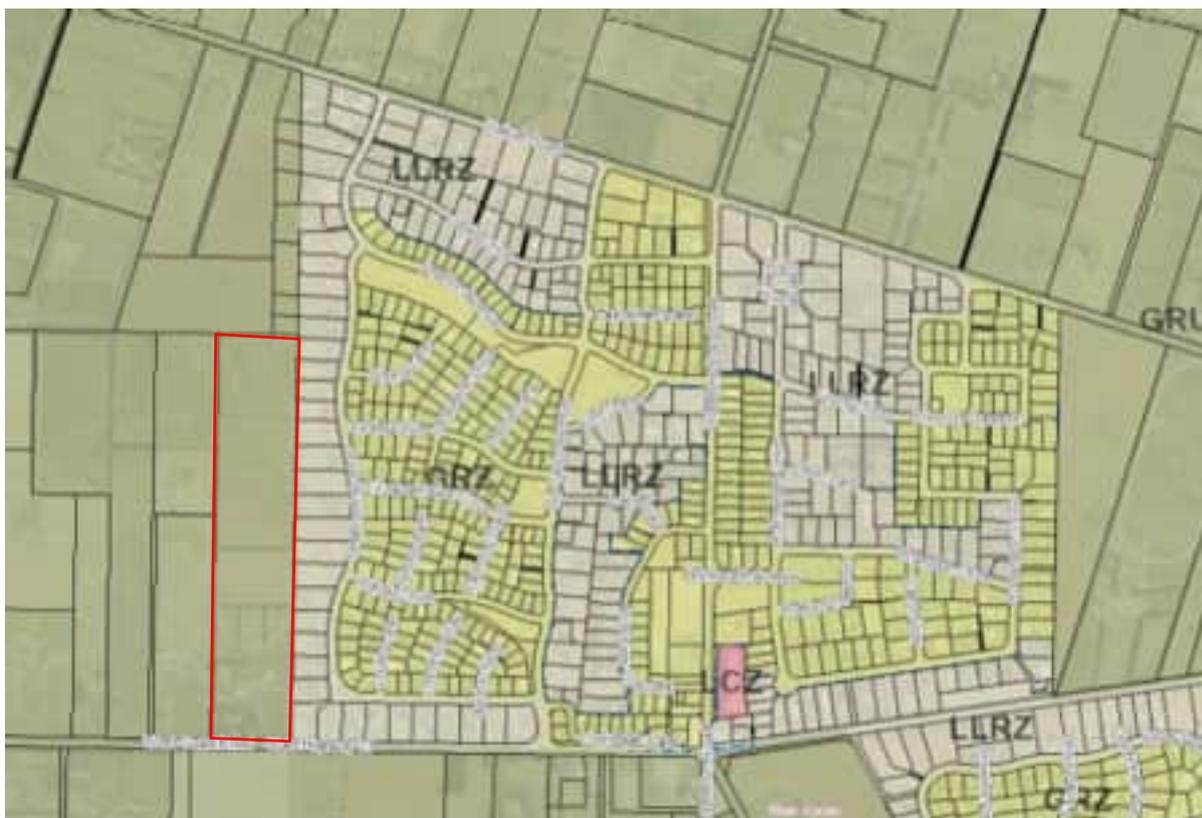


Figure 3: PSDP West Melton planning map – site for proposed retirement village outlined in red.

WMHL has chosen West Melton on the basis of careful market analysis of this growth and as a consequence of the fact that there is extremely limited provision for this type of development either on greenfield land or elsewhere in Greater Christchurch.

WMHL has pursued this form of development through the Proposed Selwyn District Plan (PSDP) and a private plan change, the latter having to be placed on hold due to significant delays in processing the application.

Site & merits of rezoning

The proposed retirement village site is outside the Projected Infrastructure Boundary on Map A in Chapter 6 of the Canterbury Regional Policy Statement (CRPS). The PSDP has consequential provisions which give effect to the CRPS.

The proposed rezoning in the PSDP to facilitate development of the retirement village is General Residential subject to an Outline Development Plan (ODP) attached as **Appendix A** to this submission. The ODP includes specific requirements with respect to the retirement village proposal, including sustainable development design, connectivity within the Site and to the existing urban area and to adjoining rural land as a form of 'future proofing' for possible development of adjoining rural land in the future. As noted in the ODP narrative, the

required sustainable design measures “*serve to reduce greenhouse gas emissions and enhance the overall sustainability of the development. Design measures are to include solar power, Electric Vehicle charging stations, parks, trails and water minimisation and re-use strategies such as rain harvesting.*”

The proposed rezoning meets the National Policy Statement-Urban Development (NPS-UD) Policy 8 criteria for unanticipated (in RMA documents) proposals, including adding significant development capacity and contributing to a well functioning urban environment; and the National Policy Statement – Highly Productive Land (NPS-HPL) criteria for rezoning HPL for urban purposes.

Economic experts agreed that the rezoning is required to support plan enabled housing capacity shortfalls in West Melton, in particular the shortfall of provision for dedicated retirement village development to cater for an aging population.

The proposed rezoning is:

- I. is in accordance with and supports the emerging growth direction for West Melton;
- II. promotes the social economic and cultural well-being of current and future residents of West Melton by adding to land supply and providing a much needed alternate housing option, enabling residents to ‘age in place’, contributing to a more balanced mixed age community;
- III. gives effect to the National Policy Statement on Urban Development 2020 (NPS-UD) through providing a housing choice (retirement village) that currently is unavailable in West Melton. Evidence on this matter can be found at the following links:

[https://extranet.selwyn.govt.nz/sites/consultation/DPR/Shared%20Documents/Hearing%2030.3%20Rezone%20-%20West%20Melton/Hearing%2030.3%20Submitter%20Evidence/DPR-0460%20Marama%20Te%20Wai%20Ltd/DPR-0460%20Marama%20Te%20Wai%20Ltd%20-%20Statement%20of%20Fraser%20Colegrave%20\(Economics\).pdf](https://extranet.selwyn.govt.nz/sites/consultation/DPR/Shared%20Documents/Hearing%2030.3%20Rezone%20-%20West%20Melton/Hearing%2030.3%20Submitter%20Evidence/DPR-0460%20Marama%20Te%20Wai%20Ltd/DPR-0460%20Marama%20Te%20Wai%20Ltd%20-%20Statement%20of%20Fraser%20Colegrave%20(Economics).pdf) (Fraser Colegrave - Economics)

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/Shared%20Documents/Hearing%2030.3%20Rezone%20-%20West%20Melton/Hearing%2030.3%20Submitter%20Evidence/DPR-0460%20Marama%20Te%20Wai%20Ltd/DPR-0460%20Marama%20Te%20Wai%20Ltd%20-%20Harlow%20West%20Melton%20Market%20Assessment%20Report%20-%20February%202022.pdf> (Harlow West Melton Ltd Market Assessment Report)

Alternative Relief

The alternative amendment to Maps 2 and 14 extends the proposed urban growth area to include adjoining land to the north, enabling a future road connection with Halketts Road (in addition to the proposed connection via the existing urban area to the east) and possible growth to the east.

Response to Online Form questions (where relevant to WMHL and our interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere (other than within existing urban areas and already approved plan changes), including residential development of the WMH submission land at West Melton.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after,

thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

A key reason why Rolleston, for example, has grown so rapidly post earthquakes is because it has met the very high market demand for quality affordable housing, the consenting process has generally been far easier than elsewhere and the local council more enabling of development, including a flexible approach towards provision of required infrastructure. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

There needs to be a balance between and ample provision for greenfield development and intensification, including our the WMH submission land, in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Retirement villages are built at scale and require large vacant sites. Clearly they cannot be accommodated in high density buildings along core PT and MRT routes, to be constructed within existing already fully developed urban environments. Retirement housing will continue to grow in demand as the population ages, and provide an affordable, safe and supportive housing option for the elderly.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses far too much future development and investment around the MRT corridor – rather than other urban centres and transport corridors, and other locations which will contribute to well functioning urban environments, including the WMH land at West Melton.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'. Retirement villages by their nature are less focussed on vehicle ownership and use.

Urban consolidation

The GCSP needs to support urban consolidation, rather than a total focus on a compact urban form, with intensification centred along a possible future MRT corridor. Urban consolidation of existing townships, including by rezoning the WMH land at West Melton, needs to be enabled to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with existing good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c).

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

#4Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions. Further residential development opportunities, including the WMH submission land, need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
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- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Highly Productive land and the NPS-HPL

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the land adjoining the existing urban areas in GC is already highly fragmented into rural lifestyle blocks which are too small to be highly productive. In addition the WMH land is typically subject to a range of constraints such as a lack of available irrigation in over allocated catchments, which means that there is no realistic prospect of it being utilised for productive purposes in the short, medium and long term.

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for GC.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

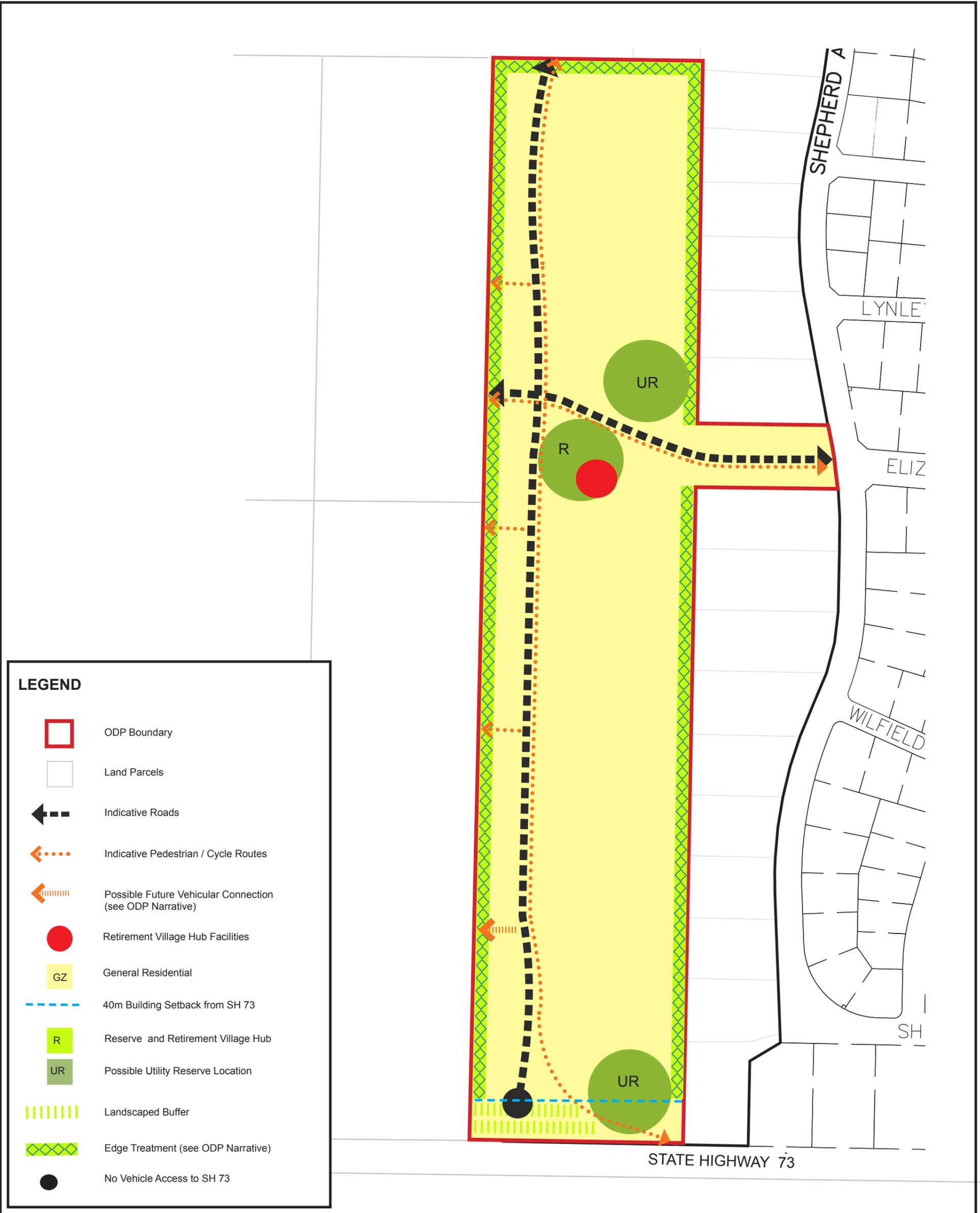
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The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to

urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Appendix A: Proposed Outline Development Plan for WMH Site



LEGEND

-  ODP Boundary
-  Land Parcels
-  Indicative Roads
-  Indicative Pedestrian / Cycle Routes
-  Possible Future Vehicular Connection (see ODP Narrative)
-  Retirement Village Hub Facilities
-  General Residential
-  40m Building Setback from SH 73
-  Reserve and Retirement Village Hub
-  Possible Utility Reserve Location
-  Landscaped Buffer
-  Edge Treatment (see ODP Narrative)
-  No Vehicle Access to SH 73

Note:

DEV - WM1
West Melton Development Area



APPENDIX 3B Proposed Amendments arising from JWS highlighted in Red Underlined or ~~Strikeout~~.

(Definitions shown in Blue)

DEV-WM1 – West Melton Development Area 1

OUTLINE DEVELOPMENT PLAN –WEST MELTON

WEST MELTON WEST

Introduction

This Outline Development Plan (ODP) area comprises 12.55 ha and is bounded State Highway 73 to the south, rural land to the north and west, and existing low density residential land to the East. The ODP embodies a comprehensive development framework for a retirement village (or medium density housing) and applies urban design concepts that are embodied in the Council's Residential Medium Density Guide and Subdivision Design Guide, as appropriate.

Land Use and Density

The ODP area will provide for sites generally in a range between 150m² and 500m². It includes a Retirement Village Hub in a central location which will include community facilities for use by residents in the retirement village. Consideration will be given to these, along with associated programs, being offered to local residents and families of those residing in the village on a membership basis up to a maximum number of places in the first instance to observe traffic effects.

Higher density housing (around 150m²-300m²) will be restricted to the middle portion of the ODP area, away from the existing boundaries with rural land or existing low density residential development.

The nett density is anticipated to be at least 20 hh/ha.

The retirement village development is to be secured by a legal instrument, such as a consent notice or covenant registered on the current titles described as RS 6619 located at 1234 West Coast Road, and Lot 283DP 458646 located at 44 Shepherd Avenue. The legal instrument will be imposed for ten years.

Or

Should the Retirement Village not proceed and an alternative development is proposed, that development alternative shall be a Comprehensive Development and/or Small Site Development developed at a minimum net density of 15 hh/hectare and in accordance with GRZ REQ 12 and/or GRZ REQ11 respectively.

Sustainability

Sustainability Development of the Site is to incorporate design measures that serve to reduce greenhouse gas emissions and enhance the overall sustainability of the development. Design measures are to include solar power, Electric Vehicle charging stations, parks, trails and water minimisation and re-use strategies such as rain harvesting.

Movement Network-Access and Transport

For the purposes of this ODP, it is anticipated that the built standard for a “Primary Route” will be the equivalent to the District Plan standards for a Local-Major Road, and a “Secondary Route” will be the equivalent to the District Plan standards for a Local-Major or Local-Intermediate Road.

The ODP provides for an integrated but simple transport network incorporating two principal roads:

- I. a primary connection that connects with Shepherd Avenue via a section that has been acquired (44 Shepherd Avenue). This access forms a key link to the east and potentially to the west. The road achieves connectivity between the proposed development and the existing township. It is strategically located in a central position, connecting the key open space within the Site with the eastern neighbourhood.
- II. another primary route runs north-south and is terminated at each end, although there is potential to extend it northwards towards Halkett Road if needed. The current function of this road connection however, is to act as an internal distributor road enabling access to the housing areas within the development.

The ODP allows for potential connectivity into adjoining areas to the north and west that can be activated at any time if or when that land is urbanised. The proposed road network **will** provide a good **future** vehicle, pedestrian and cycle connection to the north. ~~and Future connectivity to the west can be achieved via a mix of vehicular and walking/cycling links.~~ **All shared walking/cycling paths are will comply with the required standards however cycle-ways leading through the development will remain for residents only until development to the north or west requires more public permeability of the site. Currently there is no intention to open the cycleways to the general public until as there are no logical cycle links in this area. **Both the north-south and east-west roads will be designed to the required standard that will enable them to provide for through traffic if needed to integrate with any future urban zoning of the adjoining land immediately to the north and /or west.****

The current access from SH 73 will be ‘closed’, i.e. there shall be no permanent, direct access. However, an application for access during construction and/or for emergency purposes may be lodged with Waka Kotahi | NZ Transport Agency at a later stage **option**.

The ODP shows a pedestrian/cycle link to SH73 from the southern cul de sac through the SW part of the site. This can be linked to ~~any~~ a shared path along SH73 as part any upgrades to a **village township** main street in the future if speed limits are reduced. The State Highway frontage is anticipated to be upgraded to an urban standard in accordance with the Engineering Code of Practice. This work is to be undertaken in a manner that discourages future residential properties to front directly onto the State Highway.

Green Network-Open Space and Recreation

The ‘green network’ in this ODP has ~~five~~ **four** functions:

- providing a variety of open space including internal walking links;
- visually breaking up the linearity of the design layout and disrupting the continuous roofscape
- future proofing for possible (but as yet unanticipated) future urban growth to north and west (ie. green links);
- softening the interface with the existing low density residential area adjoining the Site to the east through landscaping; and providing a visual and physical buffer to SH 73 via a 40m wide landscape (and noise buffer) between the development and SH73, with walkway connections to the wider area.

The landscape strategy (xxx) has been developed to specifically to address the increased density on the elongated site by sStrategically positioning 'green areas' to break up the linearity of the design and continuous roofscape. These include east west oriented pedestrian links, small pockets of 'break-out green spaces' between dead end lanes and adequate space for street trees within the road reserve. All these strategic green areas are designed to allow for tree planting to provide a green canopy to soften and screen the built form, in particular roof lines.

Wherever possible walkways will be taken through green spaces to create a pedestrian network with a high amenity and to activate open spaces. The walking paths will have low level lighting to avoid light spill onto adjoining properties.

Specific Edge Treatment - Retirement Village – refer also to Landscape Strategy

General

Most interfaces treatment will include trees as they are intended to achieve a substantial screen without creating adverse shading conditions for the retirement village or adjoining residents. Trees on the boundary with the Rural or Residential Zone are therefore planted in a single row with centres no further apart than 3m and maintained at a height of not less than 2m. Suitable species are to be selected to reach a mature height of 10 m to ensure tree canopies provide a reasonable level of screening - include fast growing species such as Cupressus leylandii 'ferndown' or similar. Indigenous species will be planted to ensure the recommendations of the Mana Whenua Statement are given effect to.

Eastern edge

The edge treatment will provide a high amenity outlook of a semi-rural character for the existing houses onto a min 5 metre wide buffer under corporate management with generous landscaping.

This buffer strip needs to remain in corporate (not unit) ownership and ensure cohesive management and maintenance.

The landscape treatment of this buffer creates a cohesive vegetated edge of sufficient density and height that it provides privacy and visually breaks the roofscape of the proposed development so it will need to include evergreen hedge planting and trees. At the same time the planting has to be of a residential scale to avoid unnecessary shading of existing and new dwellings.

Northern edge and Western edge

The western edge will be in corporate ownership and managed and maintained by body-corporate. Here a 8m buffer reserve should be sufficient with a walk way, generous landscaping and several laterals leading into the village. This will create a high amenity for residents and break up the built form / roofscape. The northern edge is treated in a similar way but does not require lateral access points

Note: If developed for Comprehensive or Small Site Development, the Retirement Village Specific Edge Treatment shall not apply. However, in the case of Comprehensive Development, effects on character and amenity values of nearby residential areas, fencing and boundary treatments and landscaping will be considered under the relevant matters of discretion under GRZ REQ 12.

Servicing

Blue Network

There are two local/lateral former water races in the ODP area that were part of the Paparua Water Race Scheme. These are to be integrated into landscape and planting treatments around the edge of the development.

Regarding surface water management, the underlying soils are relatively free-draining and support the discharge of stormwater to ground. Stormwater will be discharged to ground directly via a system of soak pits and swales.

A natural ridge runs northwest/southeast connecting with Shepherd Avenue at its intersection with Wilfield Drive. This naturally splits the Site into two catchments, being the northern and southern catchment. A stormwater management area (SMA) for each catchment area will consist of

- a A first flush/infiltration basin - A detention basin to provide water quality attenuation in large rainfall events greater than the first flush event, but up to 2% AEP in all durations.
- b A large rapid soakage chamber under the detention basins to discharge stormwater to ground and provide additional storage within the voids of the chamber.

Detailed stormwater solutions will be determined by the developer in collaboration with Council at the subdivision stage and in accordance with Environment Canterbury requirements.

Water – An additional water source and treatment plant will be required. The requirement for the additional water source and treatment plant will be determined at the subdivision stage. Water connections are required to enable development. A utility lot will need to be provided for the water supply. This should be accommodated in the south-eastern quadrant. The water reticulation connects to the existing reticulation within the area. Upgrades of existing pipes may be required to ensure adequate water supply. The requirement for upgrades will be determined at the subdivision stage.

Wastewater

The main constraint for West Melton with respect to wastewater is the reticulation from West Melton to the Pines Wastewater Treatment Plant at Rolleston. Servicing options for addressing capacity constraints are available which can be determined at the subdivision stage. All feasible options require a new pressure main along the West Coast Road to connect to the existing pressure main at the West Melton Road/West Coast Road intersection.

Vesting of Infrastructure

All internal reserves (apart from local purpose reserves used for stormwater management) roading, pedestrian and cycle links will be maintained by the Body Corporate. Land set aside for stormwater management will be vested in the Council. If the residential activity changes from being a retirement village all roads, reserves and pedestrian/cycle facilities will be vested in the Council

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023**First name:** Lynn, Malcolm and Lynn **Last name:** Townsend and Stewart**Your role in the organisation and the number of people your organisation represents:****Would you like to speak to your submission?**

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File

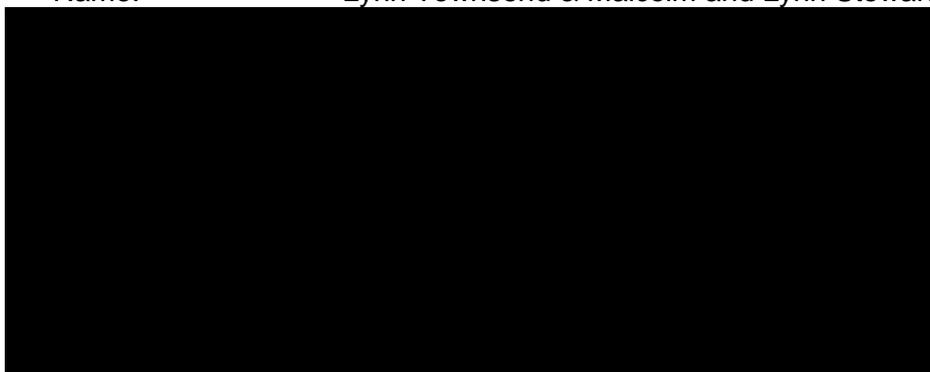
2106 SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN Townsend Stewart



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Lynn Townsend & Malcolm and Lynn Stewart



Contact Person: Fiona Aston

We wish to be heard in support of this submission.

Site Specific Matters

Decision requested. (see also responses to online questionnaire below which requests additional relief)

Include the area shown on **Figure 1** below within the Existing Urban Area or as a new/expanded business (including industrial) and/or residential area on Maps 2 and 14 of the Draft Greater Christchurch Spatial Plan (Spatial Plan), such that it reflects the proposed rezoning sought in evidence in support of our submission on the Proposed Selwyn District Plan (PSDP) as detailed below under 'Background' i.e. as shown on **Figures 3 and 4**.

Or in the alternative, identify the slightly larger area marked blue in **Figure 2** as within the Existing Urban Area or as a new/expanded industrial or industrial/residential area on Maps 2 and 14 of the Spatial Plan.

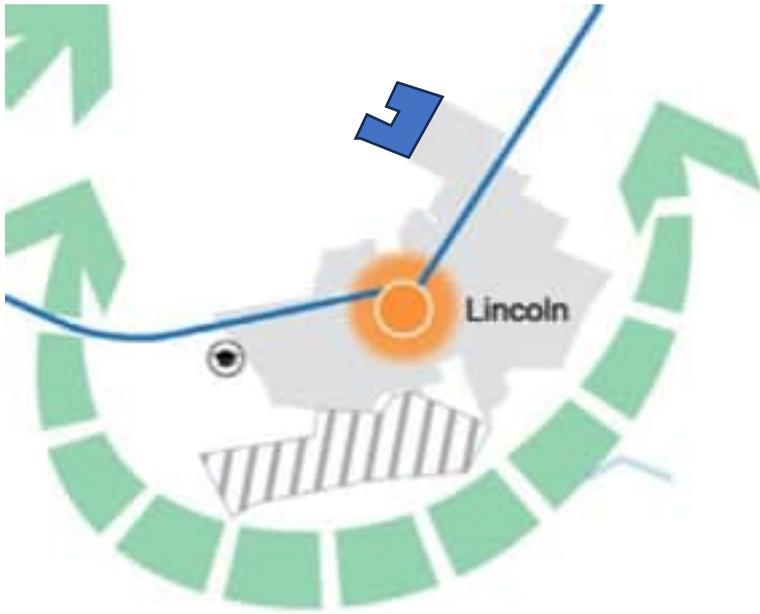


Figure 1: Amendment to Maps 2 and 14 – identify land marked blue at Lincoln as an Existing Urban Area or New Business (including Industrial) Area or New or Expanding Residential Area or New/Expanding Industrial/Business and Residential Area

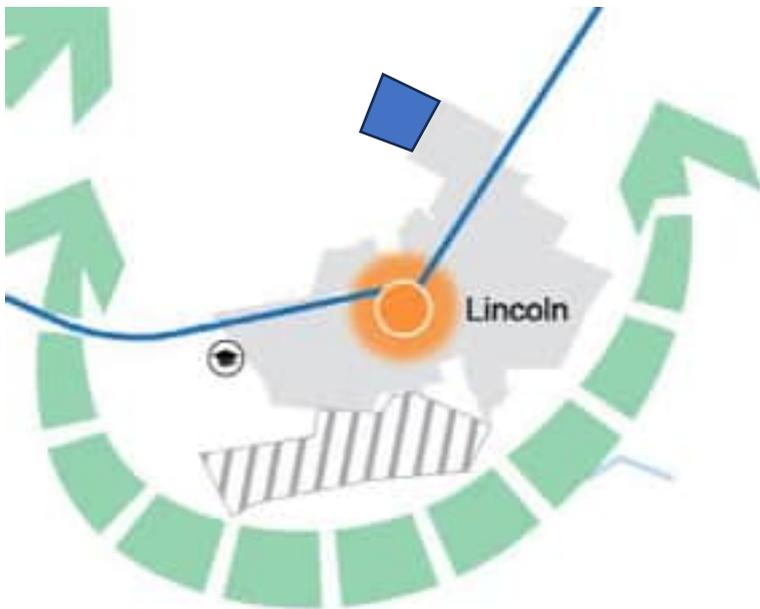


Figure 2: Alternative relief - Amendment to Maps 2 and 14 – identify land marked blue at Lincoln as an Existing Urban Area or New Industrial Area or New or Expanding Residential Area or New/Expanding Industrial and Residential Area

Any alternative, additional or consequential amendments to the Spatial Plan which give effect to the intent of this submission and our interests.

Background - Proposed Selwyn District Plan Submission

Townsend and Stewart are respective owners of two of the rural lifestyle blocks (4.95 ha and 5.45 ha respectively) proposed to be rezoned for urban development in our submission on the PSDP. The submission as lodged sought zoning of appx 39 ha. Our lodged submission on the PSDP was refined through the hearing process to include two alternative rezoning options as shown in Figures 3 and 4. The land area for Option 1 is appx 26.88ha.

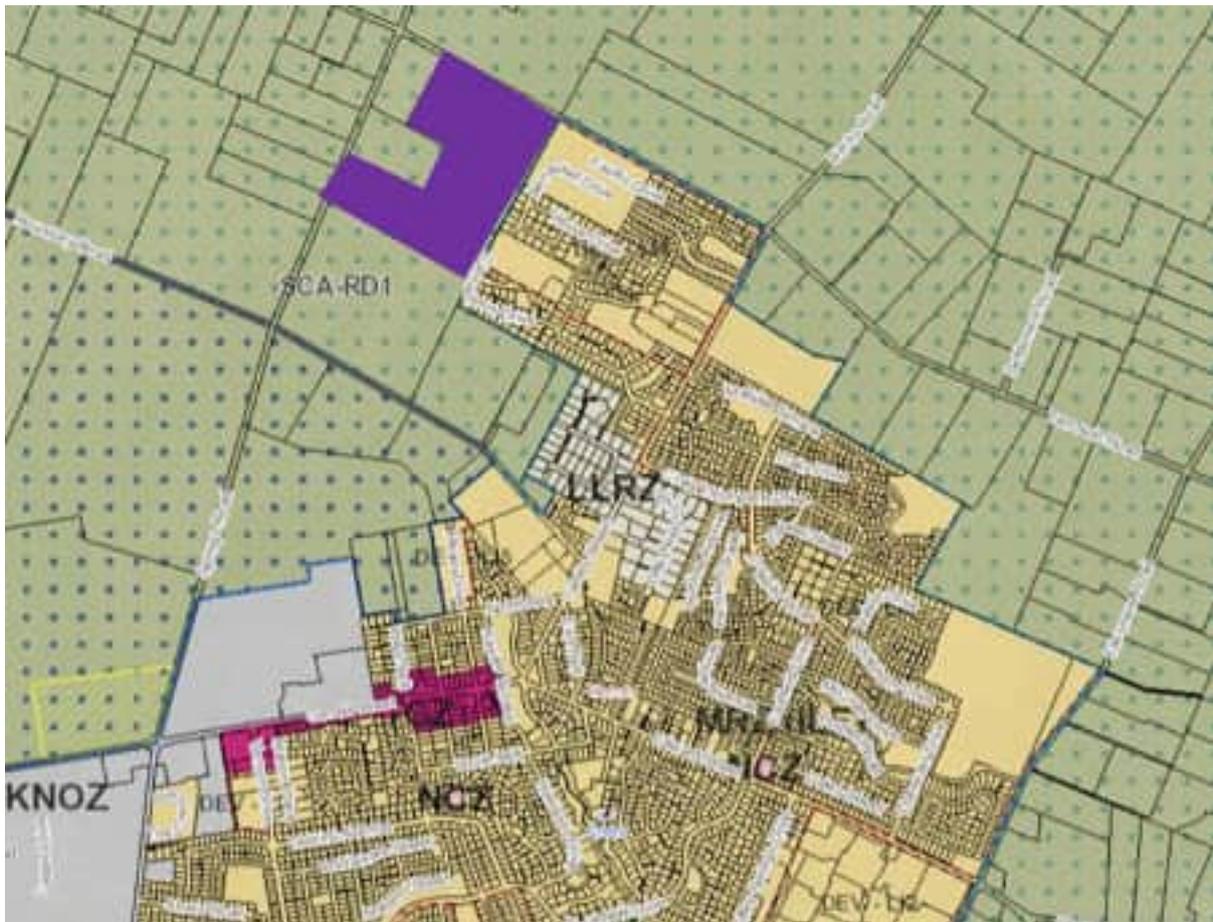


Figure 3: Townsend & ors PSDP submission– Option 1: proposed General Industrial zone North west Lincoln (26.88ha). GIZ – deep purple

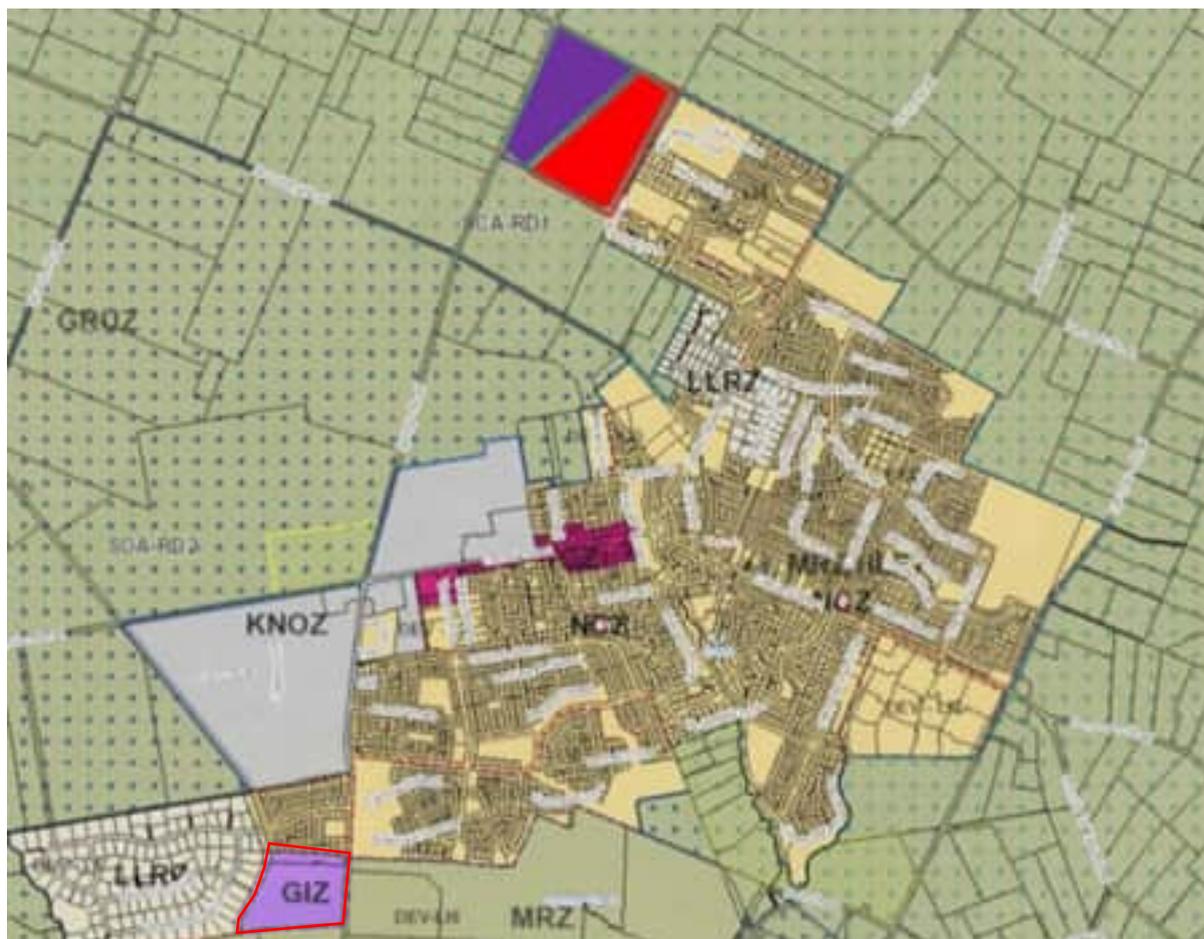


Figure 4: Townsend & ors PSDP submission – Option 2: proposed General Industrial (GIZ) and General Residential (GR) North West Lincoln (39 ha). GIZ – deep purple; GR – red. Land at south west Lincoln subject to a PSDP submission for GR rezoning and subject to a current Covid fast track application for an Arvida retirement village outlined in red (and shown as GIZ light purple).

We also submitted on Variation 1 to the PSDP seeking Medium Residential (MRZ) for that portion of the land shown as proposed GR on Figure 4.

Under Option 1, sites where the landowners were not supportive or engaging with the submitters on the proposed amended rezoning at the time of the PSDP rezoning hearings were excluded. The expert evidence in support of the rezoning noted that they could be considered for rezoning at a future date e.g. future Spatial Plan process i.e. the current process which is for a much longer timeframe than the PSDP review (appx 50 years compared with 10-15 years).

The focus in Option 1 on industrial rezoning was also in response to ‘reverse sensitivity’ matters raised by Plant and Food and AgResearch, neighbouring landowners. Whilst the evidence was that such concerns were unsubstantiated, the industrial option was put forward in an effort to progress matters with these parties who did not oppose this option.

Extensive expert evidence was presented in support of the rezoning at the PSDP hearings – see

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E6%20Rezone%20%2D%20Lincoln%2FHearing%2030%2E6%20Submitter%20Evidence%2FDPR%2D0136%20Lynn%20%26%20Malcolm%20Stewart%2C%20Lynn%20%26%20Carol%20Townsend%2C%20Rick%20Fraser&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> (evidence in chief)

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E6%20Rezone%20%2D%20Lincoln%2FSubmitters%20rebuttal%20evidence%2FDPR%2D0136%20Stewart%2C%20Townsend%20%26%20Fraser&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> (rebuttal evidence)

Site & merits of rezoning

The Option 1 and 2 land (the Site) is outside the Projected Infrastructure Boundary on Map A in Chapter 6 of the Canterbury Regional Policy Statement (CRPS).

The merits of the proposed rezoning is outlined in detail in the PSDP hearing evidence. In summary:

- 1) The Site characteristics and location are ideally suited to GIZ development, unlike the existing 12 ha GI zone at South Lincoln (as shown on Figure 4) – which is poorly located, does not provide any potential for future growth and remains undeveloped, with a submission seeking its rezoning for residential purposes. This land has been purchased by a retirement village operator (Arvida) and is also the subject of a current (recently lodged) Covid fast track application for a retirement village.
- 2) The Site provides an ideal replacement for the existing south Lincoln GIZ, which is now fully committed for residential development.
- 3) Lincoln is the Sub-District Centre and cannot properly serve this function if an adequate area of GI land is not zoned to meet the industrial needs of this fast growing township.
- 4) The proposed GI zone is needed to enable Lincoln to meet its industrial needs in the short and medium term and that the proposed location is an efficient one, at the entry/exit road into Lincoln.
- 5) The proposed rezoning meets the National Policy Statement-Urban Development (NPS-UD) Policy 8 criteria for unanticipated (in RMA documents) proposals, including adding

significant development capacity and contributing to a well functioning urban environment; and the National Policy Statement – Highly Productive Land (NPS-HPL) criteria for rezoning HPL for urban purposes.

- 6) With respect to the NPS-HPL, expert soils evidence identified that a portion of the Site had soils more accurately characterised as LUC 4 not LUC 3.
- 7) The proposal is consistent with the relevant planning framework, including the NPS-UD and NPS-HPL, Canterbury Regional Policy Statement (CRPS) and PSDP, except those CRPS and PSDP provisions which constrain urban zoning to an outdated 'hard immovable line'. These provisions are contrary to the clear direction of the NPS-UD and associated guidance, to avoid such an inflexible approach to urban growth.
- 8) The rezoning will contribute to a consolidated urban form in the northwest 'quadrant' of the township. It is contained by Springs Road to the west and Tancreds Road to the north. These roads already define the western and northern edge of the township, except for a 'segment' of remaining rural land which contain primary production research farms attached to these organisation's Lincoln based laboratory, office and associated research facilities (urban facilities zoned Knowledge Zone) – and land in the north east quadrant which may also be appropriate for urban development for the same reason.
- 9) There is also a pending shortage of commercial land at Lincoln, with the small existing town centre constrained by existing residential development arounds its edge. Identifying the Townsend & ors submission land for industrial purposes should enable development for the full range of business activities including industrial activity and business activity not suitable and/or easily accommodated in the town centre e.g. trade suppliers, large format retail. This is consistent with the approach adopted for the industrial land at Rolleston as shown in the Spatial Plan (**Figure 5**). The Spatial Rolleston Industrial Area includes the Large Format Retail Zone on the north side of SH1, located within the wider Rolleston industrial area (**Figure 6**).
- 10) The Spatial Plan has a 50 year + timeframe. It needs to forward focussed. Lincoln is the District Sub-Centre and a fast growing major township, with more substantial growth already planned both greenfield (including PC69 at South Lincoln) and enabled Medium Residential intensification. Additional industrial, commercial and community services will be required over time to support this population growth. A low carbon emissions future requires services to be provided locally, to minimise travel distances.

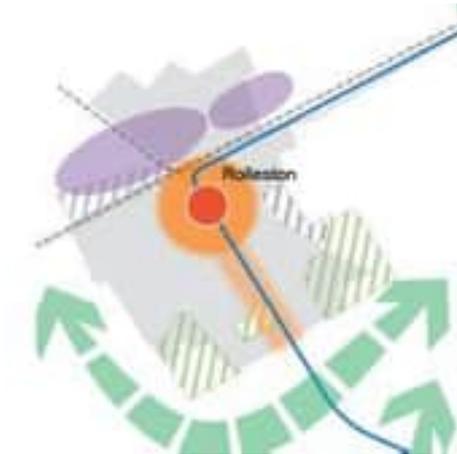


Figure 5: Spatial Plan Industrial Areas at Rolleston – purple

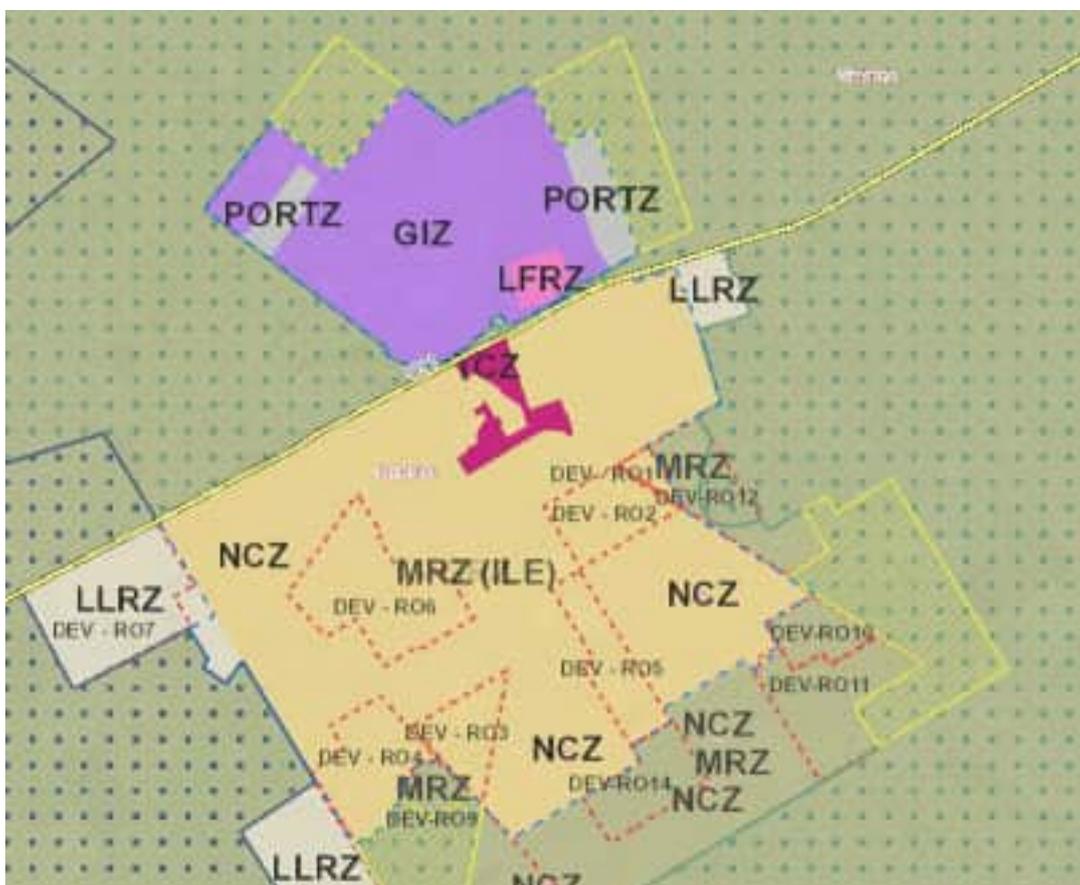


Figure 6: PSDP Rolleston Planning Map – showing GIZ and Large Format Retail Zone and Port Zone on north side of SH1 within areas identified as 'New/Expanded Industrial Areas' in Spatial Plan

11) Alternative Relief

The alternative amendment to Maps 2 and 14 includes land owned by two parties (appx 9.5 ha) who at the time of the PSDP hearing were not supportive or not engaging with submitters regarding the rezoning. Given the longer term timeframe of the Spatial Plan, there

may be merit in including this land with the urban growth area, as it is consistent with creation of a consolidated urban form defined by Springs Road (west) and Tancreds Road (north).

Response to Online Form questions (where relevant to our interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere (other than within existing urban areas and already approved plan changes), including residential development of the Townsend & ors land at north west Lincoln.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

A key reason why Rolleston, for example, has grown so rapidly post earthquakes is because it has met the very high market demand for quality affordable housing, the consenting process has generally been easier than for multi unit development and the local council generally enabling of development, including a flexible approach towards provision of required infrastructure. More recently there has been a surge in generally two storey townhouse development Christchurch City, with some larger apartment complexes where developers have succeeded in amassing the necessary titles to achieve development at scale. This has occurred at the same time as continued greenfield development.

There needs to be a balance between and ample provision for greenfield development and intensification, including the Townsend & ors submission land, in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses far too much future development and investment around the MRT corridor – rather than other urban centres and transport corridors, and other locations which will contribute to well functioning urban environments, including the Townsend & ors land at Lincoln.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT ‘solution’.

Urban consolidation

The Spatial Plan needs to support urban consolidation, rather than a total focus on a compact urban form, with intensification centred along a possible future MRT corridor. Urban consolidation of existing townships, including by rezoning the Townsend & Ors submission land at north west Lincoln for industrial and residential, or just industrial purposes needs to be enabled to achieve a well functioning urban environment and enable people and communities to continue to develop in areas with existing good accessibility between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (as required by NPS-UD Policy 1c).

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

Do you support the concept of a Greenbelt around our urban areas?

No. The concept of a ‘green belt ‘ does not appear to be well understood. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the Canterbury Regional Policy Statement (CRPS). Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to the inflexibility a green belt approach creates. This situation is contrary to the responsive planning expectations contained in the NPS-UD.

If Green Belts are retained in the Spatial Plan, then we agree with respect to Lincoln, the Green Belt between Lincoln and Prebbleton should lie closer to Prebbleton than Lincoln, as shown on the Spatial Plan (**Figure 7**)



Figure 7: Spatial Plan proposed Green Belts in vicinity of Lincoln

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions. Further industrial and residential development opportunities, including the Townsend & Ors submission land, need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

Table 2: Sufficiency of housing development capacity to meet projected demand (2022 – 2052)

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Table 4: Sufficiency of commercial land to meet projected demand (2022 – 2052)

Decisions on recent Selwyn private plan change requests consistently agreed with evidence that the Council's housing and business capacity assessments underestimated housing and business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlines Tables 2 and 3. They should be revised to reflect best practice and ensure that they comply with the NPS-UD.

With respect to business land, they must "*have or enable a variety of sites that are suitable for different business sectors in terms of location and site size*". (Policy 1). This is clearly not the case at Lincoln, where there is effectively no provision for industrial land and a tightly constrained town centre, with a need for alternative locations for commercial development, including potentially the land the subject to this submission

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Highly Productive land and the NPS-HPL

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the land adjoining the existing urban areas in GC is already highly fragmented into rural lifestyle blocks which are too small to be highly productive, as is the case with the Townsend & ors submission land. This land is typically subject to a range of constraints such as a lack of available irrigation in over allocated catchments, which means that there is no realistic prospect of it being utilised for productive purposes in the short, medium and long term.

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for Greater Christchurch.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Brent and Rebecca **Last name:** Macauley and Reid

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

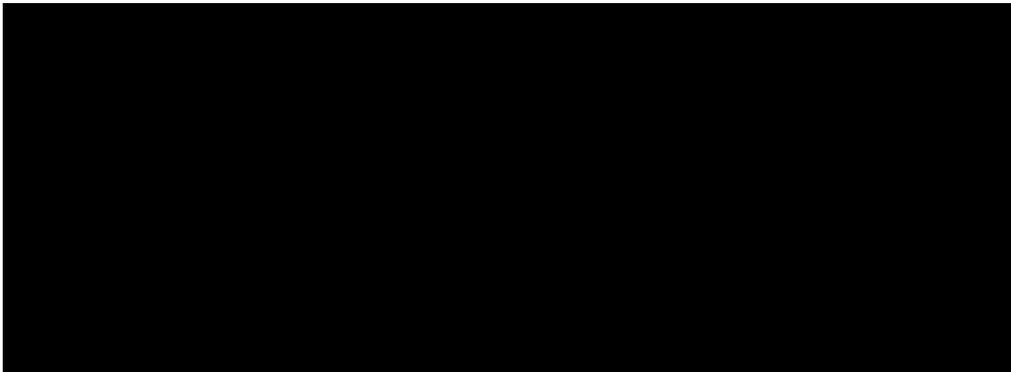
File
2118 Greater ChCh Spatial Plan Submission - Macauley and Reid



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Brent Macauley and Rebecca Reid



Contact Person: Fiona Aston

We wish to be heard in support of this submission.

Decision requested.

Identify land at north east Lincoln as an Existing Urban Area or Expanded Urban/Residential Area on Maps 2 and 14 of the Spatial Plan ie. north to Trancreds Road, east to Ellesmere Road, and other land as appropriate on the urban zoned edge of Lincoln to provide for future housing and business land at Lincoln over the timeframe of the Spatial Plan (50 years +).

Enable a more dispersed/distributed urban growth approach, including further growth of existing townships and settlements rather than the focus on a compact city form which concentrates on housing intensification along core Public Transport corridors (including Mass Rapid Transit) and in and around major centres.

Any alternative, additional or consequential amendments to the Spatial Plan which give effect to the intent of this submission and our interests.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Andrew **Last name:** McAllister

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

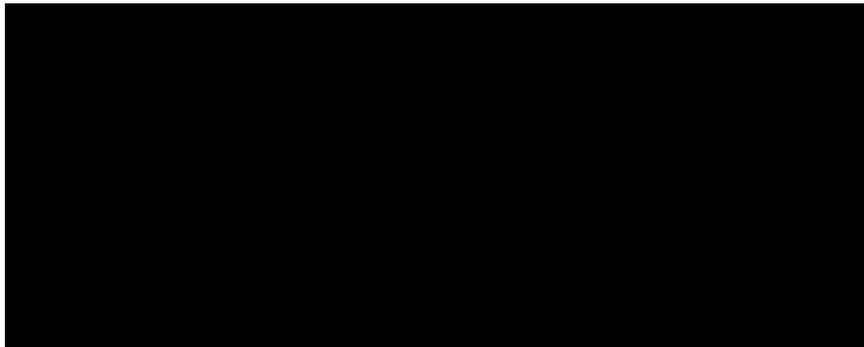
File
2264GCPS Submission - Andrew McAllister



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Andrew McAllister



Contact Person Fiona Aston

Hearing Option

I do wish to be heard in support of this submission. If others are making a similar submission, I may consider presenting a joint case with them at the hearing.

Relief Sought (see also 'Response to online submission form questions' below)

Amend Maps 2 and 14 to include existing LLR zones including at Swannanoa. LLR is a form of low density urban zoning. Existing LLR zones in Greater Christchurch appear to be excluded from Maps 2 and 14.

Amend the Spatial Plan to recognise and provide for a diversity of housing types in a range of locations, including LLR, including my land at Swannanoa.

Any additional, alternative or consequential amendments which give effect to the intent of this submission and my interests.

Any alternative, additional, consequential or other relief which gives effect to the intent of my submission and my interests.

Background

I own land at Swannanoa adjoining the existing Large Lot Residential Zone (LLRZ) as shown on Figure 1 below. Two Chain Road runs north-south between my western blocks (1401

and 1419 Tram Road) and the existing Swannanoa LLRZ. Two Chain Road is the western boundary of the Greater Christchurch Area i.e. 1275 is within Greater Christchurch, but 1401 and 1419 are outside.



Figure 1: PWMD planning map – Swannanoa. 1275 Tram Road outlined in red. 1401 and 1419 Tram Road outlined in blue. Existing LLRZ – light grey. LLR overlay (LLRO) – grey hatch.



Figure 2: PWDP planning map showing location of Swannanoa (circled in red) in wider context. LLRZ – light grey

I have lodged a submission on the PWDP supporting the LLRO for 1401 and 1419 Tram Road and a LLRO for 1275 – see

https://www.waimakariri.govt.nz/_data/assets/pdf_file/0025/112858/8-SUBMISSION-ANDREW-MCALLISTER-resized.pdf

I wish to develop 1401, 1419 and 1275 (the Sites) for LLR purposes in the immediate future. I am working with Survus in support of their submission on the PWDP which seeks LLR zoning for preferred rural residential areas in the Waimakariri Rural Residential Development Strategy 2019, and other areas adjoining existing LLR zones, such as 1275 Tram Road.

I am concerned to ensure that the Spatial Plan recognizes the need for diversity of housing types in a range of locations, including provision for some additional LLR zones, including my land at Swannanoa. Further LLR development here will build on and support the existing Swannanoa community, which includes a primary school, reserve and church. 1275 is ideally located, next to the primary school. I am in discussion with the Swannanoa School Board, regarding gifting some land to the school as part of my proposed LLR development

for an extension of the school car park. This will address current severe car parking and safety issues associated with the current car parking and access arrangements (Tram Road is a busy arterial route).

Responses to Online Submission Form Questions

Do you support the improved public transport system proposed in the draft Spatial Plan?

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing

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

The Spatial Plan proposes a compact urban form, intensifying development in and around existing major centres and along core Public Transport corridors, including a proposed Mass Rapid Transport (MRT) route for which there is no funding in place and no approved business case. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The 'compact urban form' proposal focuses far too much future development and investment around the MRT corridor – rather than other urban centres and existing settlements, and other locations which will contribute to well functioning urban environments, including my land at Swannanoa. A distributed/dispersed 'urban village' urban form is more appropriate for Greater Christchurch, having regard to the existing radial hub and spoke settlement pattern, which is evident on Maps 2 and 14.

Reductions in greenhouse emissions can also be achieved by other private and public transport modes – electric vehicles, including scooters and bikes rather than a sole focus on a fixed MRT 'solution'.

There needs to be a balance between housing intensification and greenfield development in order to meet the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Draft Greater Christchurch Spatial Plan (GCSP) does not achieve this. The Spatial Plan is proposed as the Future Development Strategy as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the Spatial Plan does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There will be a shortfall in Selwyn and Waimakariri Districts.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times, including at Prebbleton. This is totally contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

Large Lot Residential Development

The Spatial Plan will be implemented as part of the Canterbury Regional Policy Statement (CRPS) review in 2024 and needs to recognise and address the full range of housing needs, including provision for LLR development.

The Spatial Plan and subsequent CRPS review should not retain the current CRPS approach to LLR as set in Policy 6.3.9. This limits rural residential development to preferred areas identified in a Council approved rural residential strategy. It is contrary to the NPS-UD and far too restrictive, 'fixed' and 'unresponsive' to housing needs as these change and evolve over time.

LLR should enable housing in the appx. 1000m² + size range rather than be restricted to larger lots averaging 5000m² as is the current requirement in the CRPS. This is wasteful of land and is larger than required to market demand.

While the weight of demand (and the planning response) is around affordable housing, around small lots and dense development that supports investment in public facilities and amenities such as public and active transport, reserves, and commercial services, there is always a wide spectrum of preferences at play in the housing market. The demand for high quality, generous houses set on generous sized parcels of land within high amenity settings is an important and no less relevant housing sector. There is a strong unmet demand for larger family homes with room for a pool or similar. Purchasers want to be close the amenities of District towns and Christchurch City and within walking and cycling distance of local schools. They do not want the only other available option – a 4 ha lifestyle block.

LLR sites are large enough to accommodate multi-generational living opportunities – and contribute to housing affordability whereby younger or retired family members can be accommodated in minor residential units and provide mutual support (child care, care of elderly family members etc). Apartments, terraced houses and townhouses can't.

LLR development is not a 'luxury item' or a form of urban development which cannot support a low carbon future with reduced greenhouse gas emissions given that over time it is anticipated that there will be a shift towards electric vehicles.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

Do you agree with the draft spatial strategy outlined above?

No – there need to be amendments to as set out below (shown in bold and underlined or ~~strike-out~~)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

I support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets . However, I do not consider that a focus on attempting to manipulate the current urban form of Greater Christchurch to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never

'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions compared to other more realistic urban form scenarios i.e a combination of consolidation and dispersed growth around existing townships – the 'urban villages' approach discussed above.

Do you have any feedback on other aspects of the Draft Spatial Plan?

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will be not give effect to higher planning documents, specifically the NPS-UD.

Highly Productive land and the NPS-HPL

The compact urban form scenario is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition of HPL is all LUC 1-3 land. However, the rural land in Greater Christchurch is already highly fragmented into 4 ha blocks which are too small to be highly productive. 1401 and 1419 are each 4 ha blocks, and I held in existing current subdivision consent for subdivision of 1275 into 4 ha blocks.

In any case, the PWDP Rural Lifestyle Zone (which is the zoning of my land at Swannanoa is exempted from the NPS-HPL under Clause 3.5.7 bi) and ii) (1401 and 1419) and 3.5.7 bii) (1275).

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for Greater Christchurch.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment; and in the context of some very significant and immediate environmental challenges (in particular climate change); and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: David **Last name:** Cowley

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
2229GCPS Submission - David Cowley



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: David Cowley



Contact Person: Fiona Aston

Hearing Option

I do wish to be heard in support of this submission. If others are making a similar submission, I may consider presenting a joint case with them at the hearing.

Relief Sought (see also 'Response to online submission form questions' below)

Amend Maps 2 and 14 to include existing LLR zones including at Ohoka. LLR is a form of low density urban zoning. Existing LLR zones in Greater Christchurch appear to be excluded from Maps 2 and 14.

Amend the Spatial Plan including Maps 2 and 14 to recognise and provide for a diversity of housing types in a range of locations, including LLR, including my land (and neighbouring land) at Ohoka as shown on Figure 1 below. I have lodged a submission on the Proposed Waimakariri District Plan (PWDP) seeking LLR rezoning of this land (lot sizes averaging appx 2000m² or the less preferred alternative, 5000m²) – see

https://www.waimakariri.govt.nz/_data/assets/pdf_file/0011/112214/244-SUBMISSION-DAVID-COWLEY-ASTON-CONSULTANTS.pdf



Figure 1: The Site (outlined in red), Potential addition to rezoning outlined blue.

Address	Legal description	Size	Current Use
405 Bradley's Road	Lot 2 DP 46148	46.96 ha	Dairying
547 Mill Road	Lot 1 DP 495408	4.03 ha	Rural Lifestyle
351 Bradley's Road	Lot 2 DP 19391 Blk X Rangiora Survey District	0.15 ha	Residential
566 Mill Road	Lot 2 DP 495408	0.03 ha	Vacant
	Total	51.143 ha	

Figure 1: Land sought to be rezoned LLR by David Cowley submission on PWDP.

Any additional, alternative or consequential amendments which give effect to the intent of this submission and my interests.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Cockram Premises Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

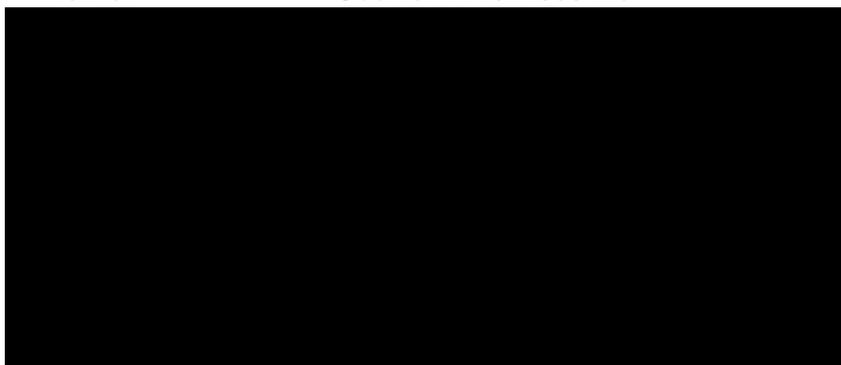
File
1082final GCSpatial Plan submission - Cockram Premises Ltd



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Cockram Premises Ltd



Contact Person: Fiona Aston

Hearing Options

We do wish to be heard in support of our submission. If others make a similar submission, we may consider presenting a joint case with them at the hearing.

Relief Sought

The amendments as set out below and alternative, additional or consequential amendments which give effect to the intent of this submission and our interests.

Maps 2 and 14

Amend the Spatial Plan so that it is clear that the Map 2 and 14 broad locations identified as suitable for future urban development do not preclude consideration of other areas including where these are located adjacent to major road or rail infrastructure, core Public Transport (PT) or Mass Rapid Transport (MRT) routes and other suitable locations, including 5 Dawsons Road.

Reason: consistent with the NPS-UD including Policy 8. The Spatial Plan has a 50 + year timeframe and needs to be able to respond to changing business and residential needs, particular in locations such as Selwyn which are growing at pace.

Amend Maps 2 and 14 to show broad locations for future urban development, including areas additional to the existing urban areas.

Reason:

The Spatial Plan does not meet the requirement for a Future Development Strategy (FDS) to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Green Belts

Remove Green Belts from Maps 2 and 14, and all Spatial Plan references to Green Belts, including the proposed Green Belt west of Templeton.

Reason:

Maps 2 and 14 propose several Green Belts, including beyond Templeton in the vicinity of the Figure 1 land.

Green Belt is defined in the Spatial Plan as:

GREEN BELT

A green belt is a planning tool used to maintain areas of green space around urban areas, often acting as a buffer between urban and rural areas.

We do not support the Spatial Plan Green Belt proposal, including in the vicinity of the Figure 1 land. This area already has a semi industrial nature with major road and rail infrastructure including the Southern Motorway exchange also a dominating influence. It does not have a typical rural character. Land on the opposite side of Dawsons Road here is the Royden Quarry. Low coverage industrial uses may be compatible with the Green Belt concept, in that there is ample open space compared to built elements, but not necessarily green open space.

We also note that the concept of a 'green belt' does not appear to be well understood. Traditionally it has been used as an instrument to prevent the outward expansion of urban areas. Greater Christchurch already has a greenbelt courtesy of Map A and Policy 6.3.1 of the

Canterbury Regional Policy Statement (CRPS). Past experience in Greater Christchurch is that some sites or areas which have planning merit have been prevented from being rezoned due to the inflexibility a green belt approach creates. This situation is contrary to the responsive planning expectations contained in the NPS-UD.

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Table 4: Sufficiency of commercial land to meet projected demand (2022 – 2052)

Revise Tables 3 and 4 (and 2) to reflect best practice and ensure that they comply with the NPS-UD.

Reason:

Decisions on recent Selwyn private plan change requests consistently agreed with evidence that the Council's housing and business capacity assessments underestimated housing and business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlines Tables 2, 3 and 4. With respect to industrial and commercial land, they need to recognise that there are a range of industrial and commercial locations required to meet the specific needs of different types of business. For example, businesses requiring large land areas and storage and display, (including heavy machinery which can damage sealed surfaces) rather than industrial or commercial buildings and may not require reticulated services are generally best accommodated outside conventional industrial zones, including the land identified in Figures 1 and 2.

NPS-UD

Amend Spatial Plan to read:

5.1 **At least s**ufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network

Reason:

Consistent with the NPS-UD.

Highly Productive land and the NPS-HPL

Amend the Spatial Plan to recognise the that HPL is not a significant issue for the future urban growth of Greater Christchurch.

Reason:

The compact urban form scenario adopted by the Spatial Plan is stated as preferable in terms of minimising the amount of HPL lost for urban development. The NPS-HPL interim definition

of HPL is all LUC 1-3 land. However, the rural land with Greater Christchurch is already highly fragmented into rural lifestyle blocks which are too small to be highly productive, as is the case with 5 Dawsons Road.

Loss of HPL is simply not a significant issue in the context of urban growth scenarios for Greater Christchurch.

Implementation

Amend the Spatial Plan to comply with the NPS-UD mandatory review and implementation requirements.

Reason:

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Background

Cockram Premises Ltd own land at 5 Dawsons Road Templeton (the Site) – as shown on Figure 1. The Site lies within a narrow strip of land located on the north side of SH1, wedged between SH1 and railway line to the north, and for the most part within the Christchurch International Airport noise contour (hereafter referred to as the SHI corridor land) – as shown on Figure 2.

The Site and wider SH1 corridor land is not well suited to residential development, but is ideally located for industrial and commercial uses including those supporting rural based business, businesses requiring large areas of land for storage, display etc and businesses requiring/benefitting from a high profile location adjoining the SH. Various such businesses are already establishing here, mostly by way of approved resource consents, including Farm Chief farm machinery business at 10 Currags Road, next to 5 Dawsons Road.



Figure 1: 5 Dawsons Road and 10 Currags Road, Templeton outlined in red



Figure 2: SH1 corridor land outlined in red.

Cockram Premises Ltd lodged a submission on the Proposed Selwyn District Plan, which was subsequently refined through the hearing process. It seeks a Rural Business Precinct Overlay over 5 Dawsons Road and 10 Curraghs Road as identified in Figure 1. The land retains a rural zoning.

Expert evidence was lodged in support of the submission – see

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E7%20Rezone%20%2D%20Eastern%20Selwyn%20Commercial%20%26%20Industrial%2FHearing%2030%2E7%20Submitter%20Evidence%2FDPR%2D0399%20Gulf%20Central%20Properties%20Ltd%20%26%20Apton%20Developments%20Ltd&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> evidence in chief; and

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E7%20Rezone%20%2D%20Eastern%20Selwyn%20Commercial%20%26%20Industrial%2FSubmitters%20rebuttal%20evidence%2FDPR%2D0399%20Gulf%20Central%20Properties%20Ltd%20%26%20Apton%20Developments%20Ltd&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> rebuttal evidence

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Survus Consultants

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

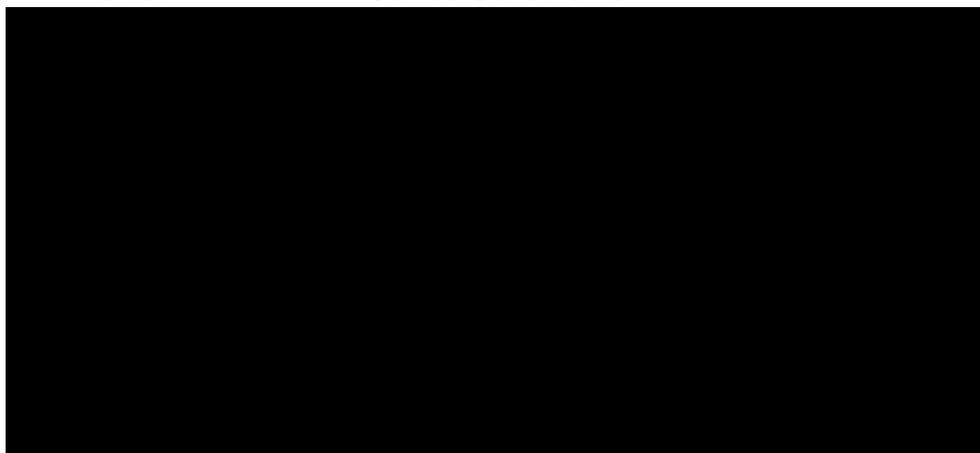
File
2269 Greater ChCh Spatial Plan Submission -Survus No2 Harewood
2269Spatial Plan submission - Survus No1 general



SUBMISSION No. 2 ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Survus Consultants



I wish to be heard in support of this submission.

Decision requested.

Amend the Spatial Plan to enable consolidation of the existing urban areas at upper Harewood as shown in Figure 1 below.

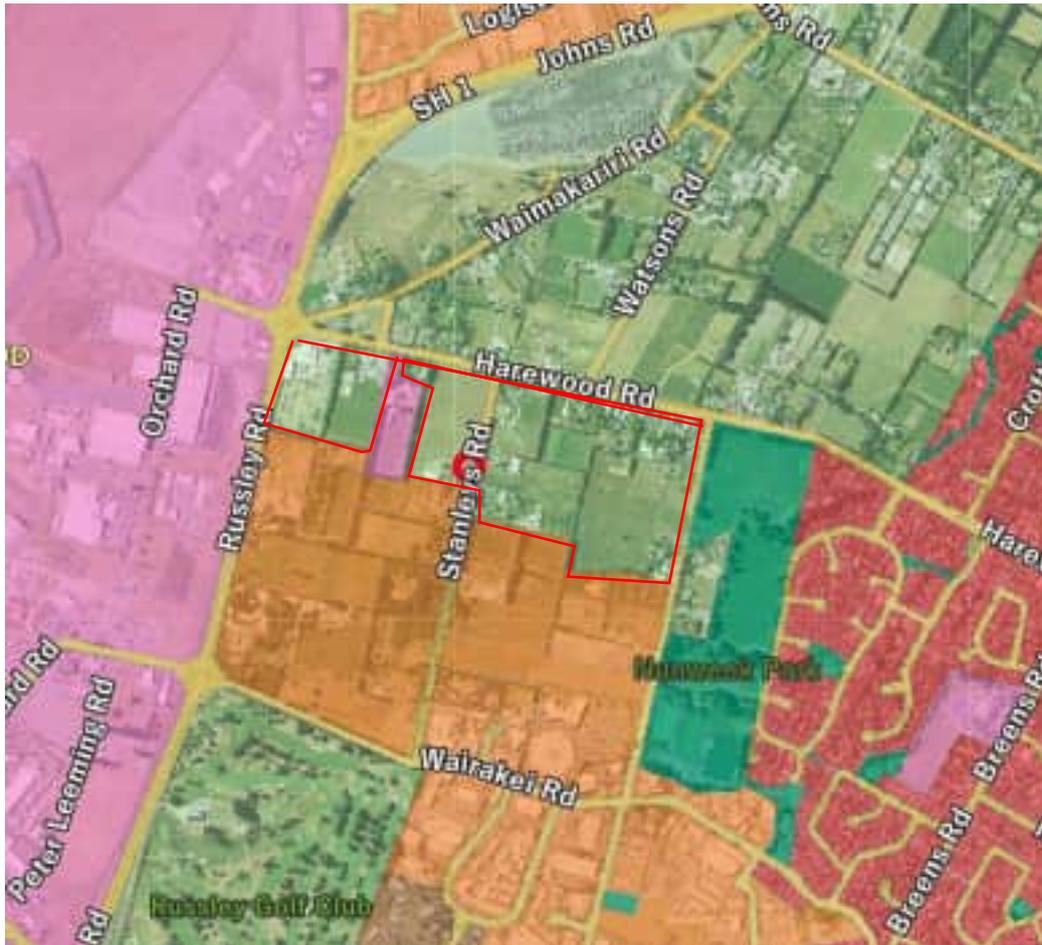


Figure 1: Gap in urban form at Upper Harewood – identify the land outlined in red in the Spatial Plan as suitable for urban development (on Maps 2 and 14 and/or by policy support for urban consolidation or similar).

Amend the Spatial Plan so that it is clear that the Map 2 and 14 broad locations identified as suitable for future urban development do not preclude consideration of other areas including where urban development supports urban consolidation, including the land identified on Figure 1 as suitable for urban development.

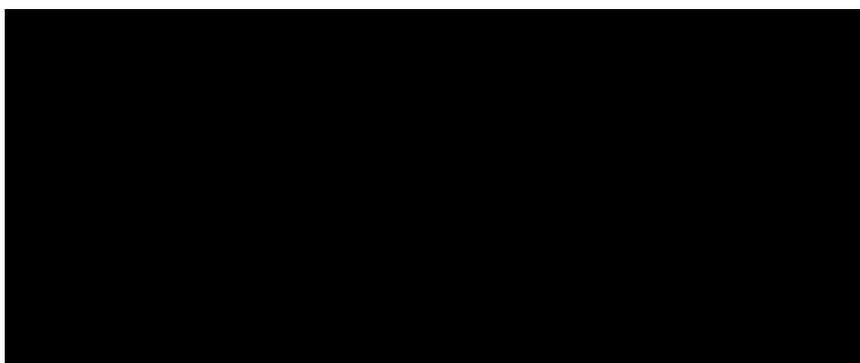
Any alternative, additional or consequential amendments to the Spatial Plan which give effect to the intent of this submission and our interests.



SUBMISSION No. 1 ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Survus Consultants



Contact Person: Fiona Aston

We wish to be heard in support of this submission.

Decision requested.

Amend the Spatial Plan to enable consolidation of existing urban areas and other settlements (including Large Lot Residential areas) including where there are 'gaps' in the current urban form of Greater Christchurch.

Enable a more dispersed/distributed urban growth approach, including further growth of existing townships and settlements rather than the focus on a compact city form which concentrates on housing intensification and business growth along core Public Transport corridors (including Mass Rapid Transit) and in and around major centres.

Amend the Spatial Plan so that it is clear that the Map 2 and 14 broad locations identified as suitable for future urban development do not preclude consideration of other areas including where these are located adjacent to major road or rail infrastructure, core Public Transport (PT) or Mass Rapid Transport (MRT) routes and other suitable locations, including the land identified on Figure 1 as suitable for urban development.

Any alternative, additional or consequential amendments to the Spatial Plan which give effect to the intent of this submission and our interests.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Fiona **Last name:** Aston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

West Melton Three Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

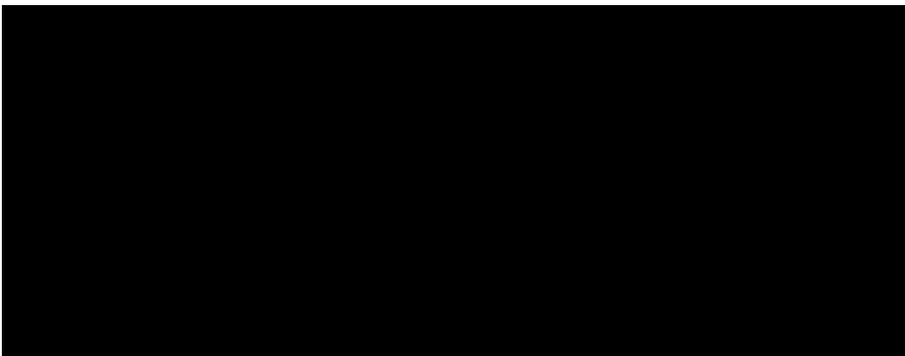
File
2114Greater ChCh Spatial Plan Submission - West Melton Three Ltd



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: West Melton Three Ltd



Contact Person Fiona Aston

We wish to be heard in support of this submission.

Decision requested.

Amend the Spatial Plan (Maps 2 and 14) to show the West Melton Tavern site shown on Figure 1 as Existing Urban Area (and other neighbouring sites containing urban facilities at West Melton as appropriate including the West Melton community centre, and sports facilities – see Figure 2 for site context).

Any alternative, additional or consequential amendments to the Spatial Plan which give effect to the intent of this submission and our interests.

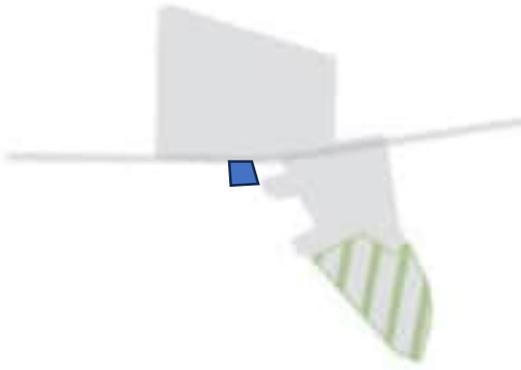


Figure 1: Location of West Melton Tavern site (appx) shown in blue.



Figure 2: Community and commercial facilities at West Melton

- Yellow star: Community Centre
- Blue star: Domain
- Orange star: Existing commercial centre
- Red dot: Tavern site
- Red star: Skate park

Figure 2: Site context

Reason:

Consistent with the existing land use and our submission on the Proposed Selwyn District Plan.

West Melton Three Ltd owns land at the corner of State Highway 73 and West Melton Road (West Melton Hotel Site), West Melton comprising 1.21 hectares (Figure 2). The land is completely surrounded by urban activities but is zoned GRUZ in the Proposed Selwyn District Plan (PSDP) (Figure 3). We lodged a submission on the PSDP seeking to rezone the land to Commercial Local Zone to reflect its current use and the hearings were held on 3 March 2023. The Tavern site is currently underutilised with an expansive area of sealed car park, excess

to the Tavern requirements. LCZ zoning will enable more efficient utilisation of the Site and enable a better contribution to the well-being and needs of the West Melton community. A mixed commercial development is proposed including retail and guest accommodation.

There were no submissions in opposition, and the Reporting Officer recommended that the submission be rejected until further information was provided on four minor site specific matters, including regarding HPL, which was subsequently provided at the hearing¹. We anticipate that this property will be rezoned when the SDC releases its decisions in August.

Expert evidence was filed and presented in support of our submission – see <https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E7%20Rezone%20%2D%20Eastern%20Selwyn%20Commercial%20%26%20Industrial%2FHearing%2030%2E7%20Submitter%20Evidence%2FDPR%2D0160%20West%20Melton%20Three%20Ltd&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> evidence in chief

<https://extranet.selwyn.govt.nz/sites/consultation/DPR/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FDPR%2FShared%20Documents%2FHearing%2030%2E7%20Rezone%20%2D%20Eastern%20Selwyn%20Commercial%20%26%20Industrial%2FSubmitters%20rebuttal%20evidence%2FDPR%2D0160%20West%20Melton%20Three%20Ltd&FolderCTID=0x012000D54AB84D0D20C74C9C650D2A1803CC0B&View=%7B30438808%2D7F31%2D46F1%2DB3D2%2D48473F2022B5%7D> rebuttal evidence

¹ https://www.selwyn.govt.nz/_data/assets/pdf_file/0009/1512819/s42A-Rezone-West-Melton.pdf

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023**First name:** Rick and Lionel **Last name:** Allaway and Larsen**Your role in the organisation and the number of people your organisation represents:****Would you like to speak to your submission?**

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

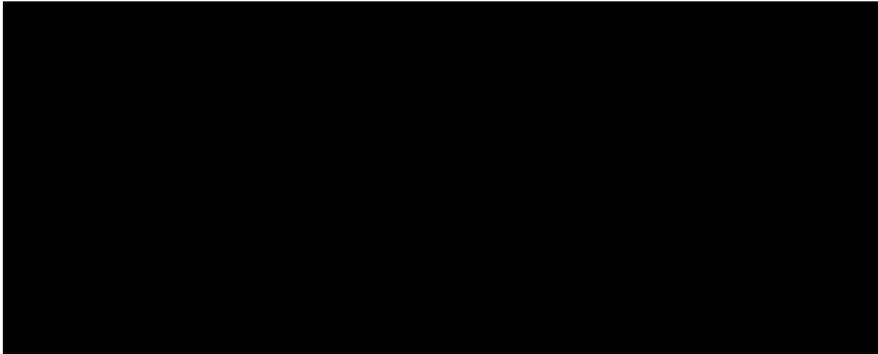
File
2002SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN - Rick Allaway and Lionel Larsen



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Rick Allaway and Lionel Larsen



Contact Person Fiona Aston

Hearing Option

We do wish to be heard in support of this submission. If others are making a similar submission, we may consider presenting a joint case with them at the hearing.

Relief Sought

Amend Maps 2 and 14 to include existing LLR zones in Greater Christchurch. LLR is a form of low density urban zoning. Existing LLR zones in Greater Christchurch appear to be excluded from Maps 2 and 14.

Amend the Spatial Plan including Maps 2 and 14 to recognise and provide for a diversity of housing types in a range of locations, including LLR, including our land (and neighbouring land) at north west Rangiora west of Lehman's Road and north of Oxford Road. We have lodged a submission on the Proposed Waimakariri District Plan (PWDP) seeking LLR rezoning of this land (lot sizes averaging appx 2000m² or the less preferred alternative, 5000m²). It would also be suitable for full urban residential development and should be shown as a future urban residential growth area in the Spatial Plan – see

https://www.waimakariri.govt.nz/_data/assets/pdf_file/0012/112206/236-SUBMISSION-RICK-ALLAWAY-AND-LIONEL-LARSEN-ASTON-CONSULTANTS.pdf

Any additional, alternative or consequential amendments which give effect to the intent of this submission and our interests.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Graeme **Last name:** Mathieson

If you are responding on behalf of a recognised organisation, please provide the organisation name:

AgResearch Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
AgResearch Submission Draft Greater Christchurch Spatial Plan (Final 240723)

24 July 2023

Greater Christchurch Partnership
PO Box 73014
CHRISTCHURCH 8154

Email: huihuimai@greaterchristchurch.org.nz

Dear Sir/Madam

RE: AgResearch Submission on Draft Greater Christchurch Spatial Plan

1 Introduction

1.1 On behalf of my client AgResearch Limited, I provide the following submission on the Draft Greater Christchurch Spatial Plan.

2 About AgResearch

- 2.1 AgResearch is New Zealand's largest Crown Research Institute ("CRI") with four Research Campuses and 9 Research Farms, employing approximately 750 staff nationwide. Formerly known as the New Zealand Pastoral Agriculture Research Institute Limited, it was created as a CRI in 1992 out of the research arm of the Ministry of Agriculture and Fisheries (MAF) and the agriculture section of the Department of Scientific and Industrial Research (DSIR).
- 2.2 AgResearch's purpose is to enhance the value, productivity and profitability of New Zealand's pastoral, agri-food and agri-technology sector value chains to contribute to economic growth and beneficial environmental and social outcomes for New Zealand. This sector is the backbone of New Zealand's economy and its continued success is essential to this country's living standards. AgResearch's research facilities are a significant contributor to this purpose, providing multi-decade information on long term impacts of farming practices, environmental changes and resulting farm system responses.
- 2.3 The Company works with stakeholders to develop leading-edge scientific solutions for a range of national and international customers, including government agencies, industry bodies and private companies. AgResearch is the lead CRI in the areas of pasture based animal production systems, new pasture plant varieties, agricultural-derived greenhouse gas mitigation and pastoral climate change adaption, agri-food and bio-based products and agri-

technologies and integrated social and biophysical research to support pastoral sector development.

- 2.4 AgResearch has significant assets and operational interests with respect to land within the Greater Christchurch area in particular within and near Lincoln township. AgResearch's Head Office and Campus is located on Springs Road in Lincoln (near Lincoln University), and the Company also owns and operates two nearby Research Farms.
- 2.5 In addition to AgResearch's research facilities, there are a number of other key education and research providers in and around Lincoln such as Lincoln University, Plant and Food, HortResearch Landcare, Foundation for Arable Research, Kerablast, Plantwise and MAF. There is a relatively strong inter-relationship between the different organisations in terms of knowledge sharing and joint ventures. The organisations are also significant employers for Lincoln, Christchurch and other nearby towns and areas.
- 2.6 AgResearch's purpose is to enhance the value, productivity and profitability of New Zealand's pastoral, agri-food and agri-technology sector value chains to contribute to economic growth and beneficial environmental and social outcomes for New Zealand. This sector is the backbone of New Zealand's economy and its continued success is essential to this country's living standards. AgResearch's research facilities are a significant contributor to this purpose, providing multi-decade information on long term impacts of farming practices, environmental changes and resulting farm system responses.
- 2.7 The Company works with stakeholders to develop leading-edge scientific solutions for a range of national and international customers, including government agencies, industry bodies and private companies. AgResearch is the lead CRI in the areas of pasture based animal production systems, new pasture plant varieties, agricultural-derived greenhouse gas mitigation and pastoral climate change adaption, agri-food and bio-based products and agri-technologies and integrated social and biophysical research to support pastoral sector development. The research undertaken by AgResearch (including the research undertaken at Lincoln) is of national significance to the agricultural sector.
- 2.8 AgResearch's facilities within the Greater Christchurch area represent a significant capital investment in research infrastructure and the research undertaken is of regional and national significance to the agricultural sector. As a result, AgResearch's facilities and research activities are a significant physical resource that should be appropriately recognised, provided for and protected in the Greater Christchurch Spatial Plan (consistent with the Greater Christchurch Urban Development Strategy and Action Plan 2007 ("Greater Christchurch UDS")).

3 AgResearch Submissions on Draft Greater Christchurch Spatial Plan

3.1 Context (Te Horopaki) Chapter

- 3.1.1 The last paragraph of the “How Greater Christchurch has grown” subsection (page 19) states the following:

Greater Christchurch has developed into the primary economic hub and commercial centre for the Waitaha / Canterbury region and Te Waipounamu / South Island, supporting a number of nationally important economic assets. This includes a large business sector, four tertiary institutions, a number of research institutions, an international airport, a sea port and two inland ports.

- 3.1.2 **AgResearch supports retention of the above paragraph** on the basis that the Draft Greater Christchurch Spatial Plan has appropriately recognised that the Greater Christchurch area includes “research institutions” which are “nationally important economic assets”.

3.2 Part 2 – An urban form for people and businesses (Wahanga 2 – He ahua taone mo nga tangata me nga pakihī)

Opportunity 5: Provide space for businesses and the economy to prosper in a low carbon future

- 3.2.1 Opportunity 5 (Provide space for businesses and the economy to prosper in a low carbon future) includes the following introductory statement (page 75):

Greater Christchurch has a strong and diverse economy. Leveraging the economic assets and strengths of the city region is important for supporting business growth and increasing quality employment opportunities for the growing population. The Spatial Plan provides for the needs of businesses through a network of centres that are well connected and serviced by infrastructure.

- 3.2.2 The “Context” section (page 75) includes the following two bullet point statements relevant to AgResearch:

- *Hubs of tertiary and research institutions are found in Christchurch’s Central City, including the Ara Institute of Canterbury, the tertiary teaching hospital and the health precinct; and at the University of Canterbury campus in Riccarton, and the Lincoln University and research campus in Lincoln.*
- *Six of the seven Crown Research Institutes in Aotearoa New Zealand are in Greater Christchurch.*

- 3.2.3 AgResearch is concerned that the subsequent “Directions” section (page 75) does not include specific directions in relation to research institutions, in particular there are no directions in relation to ensuring that research institutions (e.g. research campuses and farms) are adequately recognised, provided for and protected to ensure their continued efficient operation and future development. The Greater Christchurch Spatial Plan needs to be more consistent with the Greater Christchurch UDS in this regard. By way of example, Section 6.17 (Business Land) of the Greater Christchurch UDS states:

Greater Christchurch also contains a number and range of research centres and agricultural research farms located in close proximity to each other that are of strategic importance from a local and national perspective. Their retention and continued operation is of importance to the regional economy.

3.2.4 Similarly, in terms of managing the future development of “*Business Land*”, “*Business Infrastructure*” and “*Rural Residential Land*” in the Greater Christchurch UDS, the following relevant “*Key Approach*” has been identified for each of the different land uses (in Sections 6.17.3, 6.19.3 and 6.25.3 respectively):

Manage adverse effects on strategic nationally and regionally important research centres and farms.

3.2.5 Consistent with the Greater Christchurch UDS, a key resource management issue of concern for AgResearch is the potential for reverse sensitivity effects occurring as a result of the establishment of adjacent incompatible activities near Research Centres or Farms. For example, encouraging the establishment of new residential or rural residential areas in the vicinity of AgResearch’s Lincoln Research Farms could constrain existing and future activities and not enable the efficient use of AgResearch’s assets, operations and resources.

3.2.6 In terms of the Research Farms for example, AgResearch is concerned that changing the character of nearby land to residential or rural residential could result in:

- (a) an influx of complaints about the activities of AgResearch (or future tenants) on the basis that they are incompatible with a residential area;
- (b) the need for resource consents for activities that do not currently require resource consent;
- (c) opposition to any resource consent applications required by AgResearch (or future tenants) resulting in additional costs, delays and uncertainty; and
- (d) More restrictive planning provisions that apply to AgResearch’s activities (e.g. setback requirements for buildings housing animals in relation to dwellings or residential areas, more restrictive noise controls).

3.2.7 In terms of (d) above, the Canterbury Air Regional Plan (“CARP”) introduced a 1000m setback requirement for buildings housing 30 or more cattle from Residential Zones and a 500m setback from “sensitive activities” (e.g. houses, schools, community facilities), otherwise a restricted discretionary air discharge permit is required.

3.2.8 Similarly, the Proposed Selwyn District Plan has introduced the following permitted setback requirements for “*all paddocks, hard-stand areas, structures, buildings used to house stock, and wastewater treatment systems associated with intensive primary production*”:

- (a) 300m from the notional boundary of any lawfully established “sensitive activity”¹ on another site; and
- (b) 1000m from any Residential Zone.

3.2.9 Non-compliance with the above setback requirements triggers a restricted discretionary activity land use consent.

3.2.10 Due to the relatively close proximity of existing residential areas and houses to AgResearch’s Lincoln Research Farms, the Company has found itself in a situation where

¹ The Proposed Selwyn District Plan defines “sensitive activity” as “any residential activity, visitor accommodation, community facility or educational facility”.

the Regional and District Council has introduced very restrictive setback requirements that directly affect the location of new research facilities housing stock on the Lincoln Research Farms. This results in a situation where AgResearch requires resource consent for activities that were previously permitted. Any residents located within the permitted setback requirement could be considered a “*potentially affected party*” and could lodge a submission in opposition.

3.2.11 AgResearch considers that the Greater Christchurch Spatial Plan should provide direction on the need to adequately recognise, provide for and protect the strategic regionally and nationally significant Research Centres and Farms (including protection from potential reverse sensitivity effects) consistent with the Greater Christchurch UDS. Accordingly, AgResearch seeks the following amendments and additions to the Draft Greater Christchurch Spatial Plan section entitled “*Opportunity 5 (Provide space for businesses and the economy to prosper in a low carbon future)*”:

(a) Amend the introductory statement (page 75) as follows:

Greater Christchurch has a strong and diverse economy. Leveraging the economic assets and strengths of the city region is important for supporting business growth and increasing quality employment opportunities for the growing population. The Spatial Plan provides for the needs of businesses through a network of centres that are well connected and serviced by infrastructure.

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

(b) In the “Context” section (page 75), amend the second bullet point as follows:

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

(c) In the “Directions” section (page 75), add the following new bullet point:

Provide for and protect strategic regionally and nationally important tertiary institutions and research institutions (e.g. research campuses and farms) including through the management and avoidance of adverse effects (such as reverse sensitivity effects) on these facilities to enable and ensure their continued efficient operation and future development.

3.3 CONCLUSION

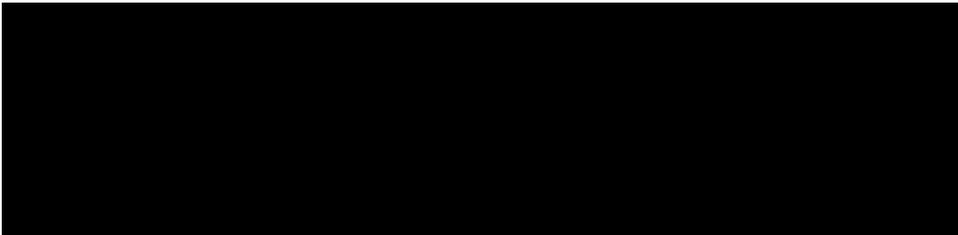
3.3.1 AgResearch supports that the Draft Greater Christchurch Spatial Plan appropriately recognises that the Greater Christchurch area includes “*research institutions*” which are “*nationally important economic assets*”. However, AgResearch considers that new provisions need to be introduced requiring that research institutions (e.g. research campuses and farms) are adequately recognised, provided for and protected to ensure their continued efficient operation and future development (which is inconsistent with the Greater Christchurch UDS).

3.3.2 Thank you for the opportunity to lodge a submission on behalf of AgResearch in relation to the Draft Greater Christchurch Spatial Plan. Please do not hesitate to contact me if you have any queries, require any further information or wish to discuss any of the submission points).

Yours sincerely



Graeme Mathieson
Mitchell Daysh Ltd



cc: John Coxhead (AgResearch Business Manager Infrastructure)



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Rebecca **Last name:** Eng

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Transpower New Zealand Limited

Your role in the organisation and the number of people your organisation represents:

Technical Lead - Policy

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
20230723 Greater Christchurch Draft Spatial Plan 2023 Transpower Feedback



Rebecca Eng



23 July 2023

Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email c/- huihuimai@greaterchristchurch.org.nz

To whom it may concern,

Greater Christchurch Spatial Plan Consultation: Transpower Feedback

This feedback has been prepared by Transpower New Zealand Limited (“Transpower”) in relation to the Greater Christchurch Spatial Plan (“the draft Spatial Plan”). Transpower appreciates the opportunity to provide feedback and wishes to be heard at the draft Spatial Plan hearing. The emerging draft Spatial Plan is broadly supported.

The National Grid

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand’s high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. The National Grid connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses. The National Grid is critically important and nationally significant infrastructure that is necessary for a reliable and secure supply of electricity throughout the country and that, in turn, supports national and regional growth.

Transpower needs to efficiently operate, maintain, upgrade and develop the National Grid to meet increasing demand; to connect new generation; and to ensure security of supply, thereby contributing to New Zealand’s economic and social aspirations. For this reason, Transpower has a significant interest in the development of an effective, workable and efficient Spatial Plan where it may affect the National Grid.

The National Grid is nationally significant infrastructure by virtue of the National Policy Statement on Electricity Transmission 2008 (“NPSET”). The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

Appendix B describes Transpower and the National Grid, including a full list of the National Grid assets within the Greater Christchurch area. Being directly relevant to the preparation of a Future Development Strategy, Appendix B also includes further details on the higher order policy context established by the NPSET.

The following is a summary of the key points arising from Transpower's feedback, which set out in detail as **Appendix A**.

Future Development Strategy

The section "Delivering on national direction" states on page 23: "the spatial plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development." This means that the Spatial Plan is required to include and be informed by specific matters set out in sub-part 4 of the NPSUD.

Transpower's assessment is that the draft Spatial Plan goes some way towards fulfilling the content and preparation requirements for Future Development Strategies (FDSs) set out in Subpart 4 of the NPSUD. An example is reference to the "electricity transmission corridor" in the "Places to Protect and Avoid" report. However, the specific requirements of NPSUD Sub-Part 4 are not clearly articulated within the draft Spatial Plan or the supporting information. Transpower therefore supports amendments to the draft Spatial Plan and technical assessments to clarify the extent to which the draft Spatial Plan has been appropriately informed by the FDS requirements. Of relevance to Transpower is the extent to which sections 3.13 and 3.14 of the NPSUD have been addressed:

3.14 [Every FDS must be informed by the following:] (f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement; and

3.13 [Purpose and content of FDS] [2 Every FDS must spatially identify] (b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of corridors and other sites required to provide it; and any constraints on development.

For example, page 23 states that "relevant national direction includes the National Policy Statement on Urban Development, Government Policy Statement on Housing and Urban Development, Government Policy Statement on Land Transport, the Emissions Reduction Plan, and other national policy statements relating to highly productive land and freshwater management. If the Spatial Plan is intended to fulfil the function of an FDS then the NPSET is also relevant in terms of *what this national direction requires of the Spatial Plan* (see page 23). It is possible that the NPSET has informed the FDS, however this is not clearly articulated within the documents such that doubt remains that this in fact the case.

In addition, the draft Spatial Plan appears to rely on the Canterbury Regional Policy Statement definition of Strategic Infrastructure to inform the infrastructure considerations, albeit it is not clear. As the draft Spatial Plan intends to fulfil the function of an FDS, a clear definition of Strategic Infrastructure is required. If necessary, alongside an explanation of how this aligns with the definitions of "development infrastructure" and "additional infrastructure" and the associated NPSUD Sections 3.13(2)(b) and (c) obligations for infrastructure. We note that these terms and their NPSUD definitions are relied upon in the supporting Housing and Business Development Capacity Assessments.

Electrification of the Economy

Transpower supports the inclusion of actions to support a reduction of greenhouse gas (GHG) emissions in the draft Spatial Plan. The NPSET Preamble states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required. Throughout New Zealand, the National Grid will play a critical role in electrification of the economy to reduce GHG emissions. In the context of all FDSs required under the NPSUD, this means ensuring that existing National Grid assets are able to be operated, maintained and upgraded and protected from inappropriate subdivision land use and development. It also means that new development of the National Grid including transmission line connections to renewable energy generation are contemplated by district and regional councils. Transpower seeks additional wording within the draft Spatial Plan to reflect the significance of the National Grid in achieving climate change mitigation objectives.

Development Constraints: "Areas to Protect and Avoid" Assessment

A significant resource management issue in Greater Christchurch and across New Zealand is inappropriate development, land use and subdivision in close proximity to existing National Grid transmission lines, which can compromise its operation, maintenance, development and upgrade. Under the NPSET, policies and plans must include provisions to protect the National Grid from other activities. Specifically, the NPSET requires that district plans include a buffer corridor

around National Grid lines within which “sensitive” activities should not be given resource consent and other activities that have the potential to compromise the National Grid or generate reverse sensitivity effects are managed. The three primary reasons for restricting activities within the buffer corridor are electrical risk; annoyance caused by transmission lines and reverse sensitivity; and restrictions on the ability for Transpower to access, maintain, upgrade and develop the lines, as well as compromising the assets themselves.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the National Grid, and function as the primary guide to inform how adverse effects on the National Grid are to be managed through planning provisions. The policies are directive in nature. The Christchurch District Plan includes National Grid corridor provisions that give effect to Policies 10 and 11 of the NPSET. The provisions for Selwyn and Waimakariri form part of the Proposed District Plans for those districts. The relief sought by Transpower in its submissions for both proposed plans is consistent with its national approach (including Christchurch).

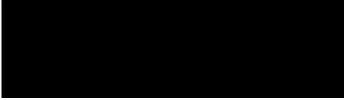
Transpower has identified some inconsistencies with how different types of Strategic Infrastructure have been categorised in the “Areas to Protect and Avoid” assessment. For example, what was meant by “protecting” the electricity transmission network with reference to the Policies 10 and 11 of the NPSET. This could be clarified by adding the background assessment and raw data showing how Strategic Infrastructure was categorised and weighted as a constraint.

Draft Spatial Plan Mapping

There are errors on a number of maps which appear to misrepresent the National Grid as “power lines”, confusing it with electricity distribution infrastructure. Some National Grid assets are also completely omitted. These errors are detailed in Appendix A. Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be correctly shown on the draft Spatial Plan maps. This information can readily be obtained from Transpower’s [open data website](#). To assist, Appendix B includes the draft Spatial Plan Map and the Strategic Infrastructure Map overlaid with the National Grid.

Thank you for the opportunity to provide comments at this time. Transpower is more than happy to answer any follow up questions the council may have on its submission, or at the hearing. The opportunity to engage further with the partnership alongside other “additional infrastructure” providers as part of Phase 2 consultation is also welcomed.

Yours faithfully
TRANSPower NZ LTD



Rebecca Eng
Technical Lead – Policy

Appendix A: Transpower’s detailed feedback on the Draft Spatial Plan

Proposed text amendments are shown as red underlined and ~~strikethrough~~

Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
Draft Spatial Plan			
“Key Terms” (page 10)	Amend	<p>The term “Strategic Infrastructure” is used throughout the draft Spatial Plan with conflicting references. For example, page 60 states that “<i>key strategic infrastructure...includes Christchurch Airport...and the electricity transmission network.</i>” Further, page 80 includes the statement:</p> <p><i>“Strategic infrastructure networks include those required to: • Manage wastewater and stormwater, and provide safe drinking water • Provide for energy needs – household, business and transport • Provide communication and digital connectivity • Transport people and goods...”</i></p> <p>“Energy” could include gas, which isn’t referenced in the earlier discussion on page 60. Nor is communication and digital connectivity.</p> <p>The term used in the draft Spatial Plan appears to reflect the definition of Strategic Infrastructure in the Operative Canterbury Regional Policy Statement. However, in absence of a precise definition within the draft Spatial Plan itself, it is unclear how the constraints presented by “strategic infrastructure” have impacted on development capacity in the FDS/draft Spatial Plan. Or the extent to which various forms of “additional infrastructure” are addressed in the draft Spatial Plan with reference to NPSUD section 3.13(2)(b) and (c). Transpower supports amendments to the Spatial Plan that reflect the NPSUD definitions of “development infrastructure” and “additional infrastructure”. Alternatively, additional text to state the definition and how this aligns with the NPSUD.</p>	Add: Definition of “Strategic Infrastructure” to Key Terms on page 10 that reflect the NPSUD definitions of “development infrastructure” and “additional infrastructure” (and any consequential amendments required to clarify the meaning of Strategic Infrastructure references elsewhere).
“Delivering on national direction” (page 23)	Amend	<p>The second and third paragraphs at the top of page 23 state:</p> <p><i>“The Spatial Plan satisfies the requirements of a future development strategy under the National Policy Statement on Urban Development. This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.</i></p> <p><i>What this national direction requires of the Spatial Plan is summarised below.”</i></p> <p>If the Spatial Plan satisfies the requirements of an FDS under the NPSUD, the first paragraph on page 23 should be amended to reflect the council’s obligations under Section 3.14(f) of the NPSUD, which requires that the FDS is informed by other national policy statements besides highly productive land and freshwater management. Transpower seeks text amendments to paragraph 1 to address this. It should at least include the NPSET.</p> <p>The remainder of page 23 lists what the national direction requires of the Spatial Plan. Transpower considers that this list is incomplete, as it appears to omit the full suite of national policy statement requirements</p>	<p>Amend first paragraph on page 23 as follows:</p> <p>Relevant national direction includes the National Policy Statement on Urban Development, Government Policy Statement on Housing and Urban Development, Government Policy Statement on Land Transport, the Emissions Reduction Plan, and <u>the following</u> other national policy statements relating to highly productive land and freshwater management:</p> <ul style="list-style-type: none"> • <u>National Policy Statement on Highly Productive Land</u>; • <u>National Policy Statement for Freshwater Management</u>; <u>[and]</u> • <u>National Policy Statement on Energy Transmission 2008</u>. <u>[add others as relevant]</u> <p>Alternatively, review entire section “Delivering on national direction” to make it clear that the FDS obligations under “Sub-Part 4 Future Development Strategy” of the NPSUD have been addressed within the Spatial Plan, including the matters that the FDS must spatially identify (section 3.13(2)) and the matters that have informed the FDS (section 3.14).</p>

Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
		under Section 3.14(f). Reference should be made to this on page 23 and within the text in orange squares on the same page. Transpower does not wish to pre-determine the approach for taking “other” national direction in to account, so has not proposed specific text amendments or additions to this part. It therefore seeks a review to ensure fulsome reference to the NPSUD requirements for FDSs. This could be achieved by amendments to the existing text or a wholesale review of this sub-section to ensure that all the NPSUD obligations are clearly addressed.	
Map 2 The Greater Christchurch Spatial Strategy (1 million people) (page 29)	Amend	The National Grid is nationally significant infrastructure by virtue of the NPSET. Section 3.14(1)(f) of the NPSUD specifically identifies that the FDS should be informed by every other National Policy Statement under the Act. On that basis the National Grid should be shown on Map 2 alongside rail and state highways.	Amend Map 2 to include the National Grid. The National Grid assets in the Greater Christchurch area have been overlaid on Map 2 for the Council’s information (see Appendix B).
Map 5 Areas to Protect and Avoid (page 52)	Amend	The direction in Policies 10 and 11 the NPSET regarding land use and development in proximity to the National Grid is directly relevant to the FDS assessment of constraints. Given the higher order direction in the NPSET, the National Grid should be shown on the “Areas to Protect and Avoid” map.	Amend Map 5 to include National Grid assets. Transpower recommends that the National Grid extent should capture the subdivision corridors (in terms of the Proposed Selwyn District Plan, Proposed Waimakariri District Plan and the Operative Christchurch District Plan). Transpower is readily able to provide this data.
Direction 5.3 “Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy.” (page 31)	Support/Amend	Transpower supports this statement on the basis that it is consistent with the NPSET.	Retain direction 5.3 “Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy.” (page 31).
Map 4 “Priority Areas for Greater Christchurch” (page 44)	Amend	Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be shown on this map as a clear constraint to development of identified priority areas.	Add National Grid to Map 4 “Priority Areas for Greater Christchurch” (page 44).
“Areas to protect” (page 51)	Amend	Transpower supports the inclusion of reference to strategic infrastructure in the “areas to protect” column on the basis that the National Grid is included in the definition. It is inferred by the key on Map 9.	Retain “Strategic Infrastructure” in the list of “Areas to protect” on page 51
Map 5 “Areas to protect and avoid” (page 52)	Amend	Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be shown on this map as strategic infrastructure to be protected.	Add National Grid to Map 5 “Areas to Protect and Avoid” (page 52).
“Protecting strategic infrastructure” (page 60)	Support/Amend	Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, Transpower supports the text on page 60. That said, an amendment is proposed to clarify the difference between electricity transmission and distribution networks. Given that Map 9 appears to show both transmission and distribution networks (albeit with errors noted below), Transpower assumes that the intent is to reference both. “Electricity transmission network” as quoted in the document is only the National Grid.	Amend final sentence on page 60 regarding “protecting strategic infrastructure” as follows: Key strategic infrastructure in Greater Christchurch includes <u>is</u> Christchurch Airport, the Port of Lyttleton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and <u>the National Grid and</u> the electricity transmission-distribution network (see Map 9). Transpower has assumed that this is the intended definition. The relief sought does not preclude an alternative definition if there are forms of infrastructure not covered here. In any event, the National Grid should be explicitly included.

Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
Map 9 “Strategic infrastructure” (page 60)	Amend	<p>There are errors on map 9 which appear to misrepresent the National Grid as “power lines”, confusing it with electricity distribution. Some National Grid assets are also completely omitted.</p> <p>Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be correctly shown on this map as a clearly requiring protection. This information can readily be obtained from Transpower’s open data website.</p>	Amend Map 9 to correctly show the National Grid and amend the legend annotation and symbols to differentiate between the National Grid assets and electricity distribution network assets.
Map 14: “Broad locations of housing and business development capacity (700,000 people)” (page 79)	Amend	Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be shown on this map as a clear constraint to development of identified broad locations of housing and business development capacity.	Add National Grid to Map 14 “Broad locations of housing and business development capacity” (page 79).
<p>5.3 “Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy” (page 80)</p> <p>Current and planned state of strategic infrastructure networks (page 81)</p>	Support/Amend	<p>In principle, Transpower supports the text in this section on page 80 and 81, particularly the role that electricity infrastructure plays in the transition to a low emissions future. It seeks additional text to both pages for the reasons set out below.</p> <p>The NPSET preamble states that ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government’s objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required. Throughout New Zealand, the National Grid will play a critical role in electrification of the economy to reduce greenhouse gas emissions. In the context of all FDSs required under the NPSUD, this means ensuring that existing National Grid assets are able to be operated, maintained, upgraded and protected from inappropriate subdivision land use and development. It also means that new development of the National Grid including transmission line connections to renewable energy generation are contemplated by district and regional councils. Transpower seeks additional wording within this section to reflect the significance of the National Grid in achieving climate change mitigation objectives.</p>	<p>Amend text on page 80, as follows:</p> <p>Telecommunications and energy infrastructure are provided by state-owned enterprises and the private sector. Telecommunications infrastructure is fundamental to the digital transformation of public and private infrastructure, while electricity infrastructure is fundamental to the transition to a low emissions future. In terms of the National Grid, this will involve protection of existing electricity transmission assets and development of connections to new sources of renewable electricity generation.</p> <p>Add new bullet point after penultimate bullet point on page 81 as follows:</p> <p>Growth in the use of electricity for transport will necessitate greater provision of electric charging networks in Greater Christchurch. This is expected to be provided by the private sector. Over time, there may be a requirement for greater local generation of green energy.</p> <p>In light of the role that the National Grid plays in electrification of the economy, the National Grid will need to be protected from inappropriate subdivision, land use and development and the partnership will work with Transpower to facilitate long-term planning for the maintenance, operation, upgrading and development of the National Grid. While existing National Grid assets are identified on the Spatial Plan maps, it is anticipated that in the life of the Spatial Plan, new assets will be needed, particularly to connect to new generation.</p>
Supporting Reports			
Areas to Protect and Avoid Report section 2.1 Identification of Areas to Protect and Avoid (page 6)	Amend	Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be included in this list alongside the New Zealand Coastal Policy Statement. This would also clearly reflect the requirements of Section 3.14(f) of the NPSUD. It is acknowledged that “strategic infrastructure” is included on the identified list of areas to protect on the same page, however it is not	<p>Amend paragraph 2 as follows (page 6):</p> <p>Areas to protect and avoid are also generally limited to those matters tested previously through a legislative process, particularly a process under the Resource Management Act. Exceptions were made for natural hazards identified within public documents but not yet tested through a resource management process. While not robustly tested through a statutory process, it is considered appropriate to include</p>

Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
		<p>clear how this categorisation has been determined in relation to the National Grid and how this has informed the weighted assessment of constraints. This statement also conflicts with the text in Section 4.5 which states that “<i>development must be avoided around significant infrastructure...</i>”</p> <p>Transpower considers that further information is required to put this in context (see below), particularly given that the National Grid has not been accurately mapped on either the “Map of Areas to Protect and Avoid” (section 3.2 page 8) or the Strategic Infrastructure Map (section 4.5 page 17).</p>	<p>the following matters given the risks posed to people and property and national direction, namely under the New Zealand Coastal Policy Statement and the National Policy on Electricity Transmission 2008 (NPSET). These additional matters include:</p> <ul style="list-style-type: none"> • coastal hazards • fault lines • tsunami • National Grid
Areas to Protect and Avoid Report Section 2.3 Weighting of Areas to Protect and Avoid (page 7)	Amend	This section explains the process followed to weight constraints that informed the “areas to protect and avoid”. Transpower seeks that the data informing this assessment are added as a background document to the draft Spatial Plan so that it is clear how “areas to protect and avoid” were ultimately categorised and weighted. For example, what is meant by “protecting” the electricity transmission network with reference to Policies 10 and 11 of the NPSET. Both policies set a strong higher order direction against the establishment of sensitive activities in proximity to and those that have the potential to compromise the National Grid. Transpower considers that the detailed approach to this assessment and the results should be included for transparency and to enable a robust review of accuracy against the national direction in accordance with Section 3.14(f) and 3.12(2)(c) of the NPSUD.	Add data and assessment informing the results of “Weighting of Areas to Protect and Avoid”
Areas to Protect and Avoid Report, Section 3.2, Map of Areas to Protect and Avoid (page 8)	Amend	The direction in Policies 10 and 11 the NPSET regarding land use and development in proximity to the National Grid is directly relevant to the FDS assessment of constraints. Given the higher order direction in the NPSET, the National Grid should be accurately shown on the “Areas to Protect and Avoid” map.	<p>Amend Map of Areas to Protect and Avoid to include National Grid assets.</p> <p>Transpower seeks that the National Grid extent should capture the subdivision corridors (in terms of the Proposed Selwyn District Plan, Proposed Waimakariri District Plan and the Operative Christchurch District Plan). Transpower is readily able to provide this data.</p>
Areas to Protect and Avoid Report Section 4.5 Strategic Infrastructure (page 17)	Support	<p>Transpower supports the identification of “Strategic Infrastructure” as a resource to avoid, in particular, the text in paragraph 2 of section 4.5 that states:</p> <p><i>“Development must be avoided around significant infrastructure to ensure the safety and wellbeing of residents, as well as maintaining the operation, maintenance and upgrades of existing infrastructure.”</i></p> <p>That said, as noted above, this statement conflicts with the text in section 2.3 of the Areas to Protect and Avoid Report, which categorises strategic infrastructure as requiring protection rather than avoidance.</p>	Retain text in paragraph 2 of Section 4.5 but clarify categorisation of constraints to address conflicting statement in section 2.3 that states strategic infrastructure is to be “protected”.
Areas to Protect and Avoid Report Section 4.5 Strategic Infrastructure (page 17)	Amend	Consistent with Transpower’s comments on the main body of the draft Spatial Plan, clarification is sought on the definition of Strategic Infrastructure and how this relates to the identification of development constraints for “other infrastructure” required in Section 3.13(2)(c) of the NPSUD, and how section 3.14 has been given effect to with regard to Policies 10 and 11 of the NPSET.	Include definition of Strategic Infrastructure to clarify how it has informed the “Areas to Protect and Avoid” background report and how this aligns with the spatial mapping requirements of NPSUD Section 3.13(2)(c).
Areas to Protect and Avoid Report Section 4.5, Map of Strategic Infrastructure Areas to Protect (page 17)	Amend	There are errors on this map which appear to misrepresent the National Grid as “power lines”, confusing it with electricity distribution. Some National Grid transmission lines are also completely omitted.	Amend map on page 17 to correctly show the National Grid and amend the legend annotation and symbols to differentiate between the National Grid assets and electricity distribution network assets.

Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
		<p>Given the national significance of the National Grid and the strong higher order policy direction regulating land use, subdivision and development in proximity to it, it should be correctly shown on this map. This information can readily be obtained from Transpower's open data website.</p> <p>There is confusion with the Map title as well, given it states, "Map of Strategic Infrastructure Areas to Protect." While the word "protect" might be applied here in a generic way, it potentially creates further confusion given the approach to weighting constraints and inconsistent use of protect/avoid terminology elsewhere.</p>	
Areas to Protect and Avoid Report, Section 4.5 Strategic Infrastructure, Electricity transmission corridors (page 18)	Support / Amend	<p>Transpower supports the text under the heading "Electricity transmission corridors" on page 18. It generally reflects the NPSET (in relation to the National Grid), however in order to ensure that the FDS aspect of the draft Spatial Plan gives proper effect to Section 3.14(f) and 3.12(c) of the NPSUD, additional text is sought. This will also bring the document in line with Section 4.4 of the Areas to Protect and Avoid report that addresses how the National Policy Statement for Highly Productive Land 2022 has informed the assessment.</p>	<p>National gGrid transmission lines and a number of other electricity transmission lines connect into and go through the Greater Christchurch sub-region. Development needs to be avoided under and around these transmission lines for safety, and maintenance purposes.</p> <p>s</p> <p>A significant resource management issue in Greater Christchurch and across New Zealand is inappropriate development, land use and subdivision in close proximity to the National Grid, which can compromise its operation, maintenance, development and upgrade. Under the NPSET, policies and plans must include provisions to protect the National Grid from other activities. Specifically, the NPSET requires that district plans include a buffer corridor around National Grid lines within which "sensitive" activities should not be given resource consent and other activities that have the potential to compromise the National Grid or generate reverse sensitivity effects are managed. This policy direction has directly informed the assessment of the National Grid as a strategic infrastructure constraint.</p>
Greater Christchurch housing development capacity assessment March 2023	Support / Amend	<p>Transpower supports the housing development capacity assessment to the extent that it clearly relies upon the NPSUD defined terms of "development infrastructure" and "additional infrastructure". This approach could be reflected in the Spatial Plan for consistency. Transpower also supports the text on page 45 that states "<i>the additional infrastructure providers will be engaged to identify whether there are any constraints to the long-term development capacity.</i>" Transpower would welcome this Phase 2 engagement as clear consideration of these matters is absent from the draft Spatial Plan.</p> <p>As nationally significant infrastructure, Transpower requests that text is added to the bullet point list on page 45 to reference Transpower and the National Grid.</p>	<p>Amend bullet point list on page 45 as follows:</p> <p>Government departments Organisations who provide development and additional infrastructure include:</p> <p>...</p> <ul style="list-style-type: none"> • Ministry of Health as providers of healthcare; • Transpower New Zealand Limited as owner and operator of the National Grid.
Greater Christchurch Business Development Capacity Assessment (General)	Support / Amend	<p>Transpower supports the approach of the Business Development Capacity Assessment to the extent that it clearly relies upon the NPSUD defined terms of "development infrastructure" and "additional infrastructure." This approach should be reflected in the Spatial Plan for consistency (as requested earlier).</p>	<p>Retain definitions of "development infrastructure" and "additional infrastructure"</p>
Greater Christchurch Business Development Capacity Assessment Appendix Section A3.1 Electricity Transmission Infrastructure (pages 68 and 69)	Support	<p>In principle, Transpower supports the text in this section. That said, the assessment of transmission capacity is focused only on business development capacity. There is no similar assessment in the Housing Development Capacity Assessment. Given the scale of electricity transmission resources supplied by the National Grid, Transpower would support a more wholesale approach to assessing transmission supply for Greater Christchurch, rather than in the context of specific land uses. This discussion could occur alongside Orion and include an</p>	<p>Engage with Transpower directly as part of the Phase 2 development capacity assessment, with regard to assessing electricity supply for the FDS as a whole (rather than by specific land use).</p>

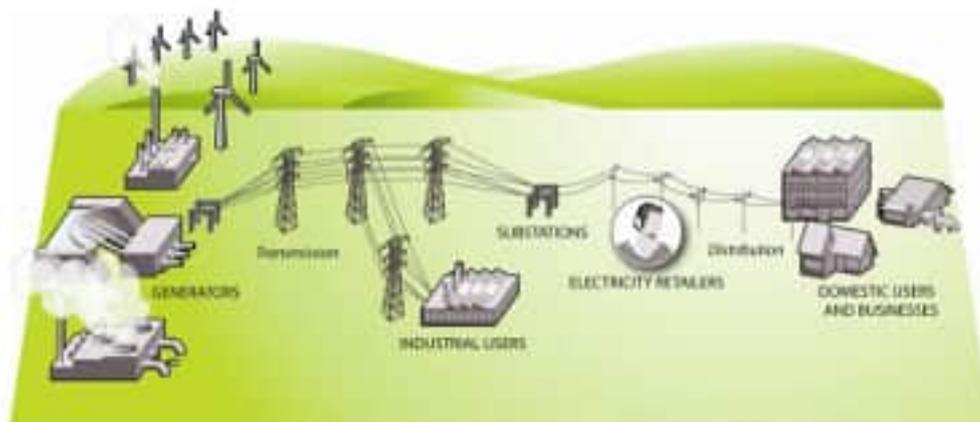
Specific part of Spatial Plan / Maps / Supporting Technical Assessments	Support/Oppose/Amend	Reasoning	Changes sought
		assessment of the Transmission Planning Report growth assumptions and how these align with growth anticipated by the draft Spatial Plan. Transpower assumes that these discussions will occur as part of the Phase 2 development capacity engagement referenced in the Housing Development Capacity Report.	
Greater Christchurch Business Development Capacity Assessment Appendix Section A3.2 Electricity Distribution Infrastructure (page 70)	Support / Amend	<p>Transpower supports the text in the final paragraph under the section “Electricity Distribution Infrastructure.”</p> <p><i>“However, the electricity sector is facing increasing uncertainty and a period of significant disruption and transformation. Rapid decarbonisation and increasing electrification present new and significant challenges for the industry - while novel and growing alternative generation resources (such as solar) and new technologies are likely to require modification and reconfiguration of existing electricity distribution and transmission network infrastructure. Orion is focused on meeting these challenges.”</i></p> <p>This statement is also directly relevant to the National Grid, and should be included in the Spatial Plan to provide more context to the role of electricity infrastructure in the future, including that upgrades and new infrastructure will be required to support electrification of the economy. Transpower has suggested additional text to section 5.3 (page 80) of the draft Spatial Plan to address these themes.</p>	Retain text in final paragraph under “Electricity Distribution Infrastructure” but note that the themes covered are also directly relevant to the National Grid.

Appendix B: Supporting Information

About Transpower

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in Figure 1 below.

Figure 1: Role of Transpower in New Zealand's Electricity Industry (Source: MBIE)



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions. It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2023, states that:

"Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing open access and helping to balance supply and demand. The nature and scope of the activities we undertake are:

- *as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country; and*
- *as system operator, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, we operate the electricity market, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure."*

In line with this role, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's 'Whakamana I Te Mauri Hiko' predicts that electricity demand is likely to increase around 55% by 2050. 'Whakamana I Te Mauri Hiko' suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which New Zealand's zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Statutory Framework

The National Policy Statement on Electricity Transmission 2008 (NPSET) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

The NPSET only applies to the National Grid, being the assets used or operated by Transpower, and not to electricity generation or distribution networks.

The NPSET sets a clear directive on how to provide for National Grid resources (including future activities) when drafting planning documents and therefore Councils have to work through how to make appropriate provision for the National Grid in their plans, in order to give effect to the NPSET.

The single Objective of the NPSET is:

"To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network."

The NPSET's 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

National Grid Assets within Greater Christchurch

Selwyn District

- Benmore-Islington – A (BEN-ISL-A) 220 kV Single Circuit on Steel Towers;
- Christchurch-Twizel-A (CHH-TWZ-A) 220 kV Double Circuit on Steel Towers;
- Roxburgh-Islington-A (ROX-ISL-A) 220 kV Single Circuit on Steel Towers
- Hororata-Islington-E (HOR-ISL-E) 66 kV Double Circuit on Steel Poles
- Brackendale-Hororata-A (BKD-HOR-A) 66 kV Double Circuit on Steel Towers
- Coleridge-Brackendale-D (COL-BKD-D) 66 kV Double Circuit on Steel Poles
- Coleridge-Otira-A (COL-OTI-A) 66 kV Double Circuit on Pi-Poles
- Benmore-Haywards-A (BEN-HAY-A) 350kV Double Circuit on Steel Towers
- Arthurs Pass Substation (APS)
- Castle Hill Substation (CLH)
- Coleridge Substation (COL)
- Brackendale Site Tee (BKD)
- Hororata Substation (HOR)
- Kimberley Substation (KBY)
- Kimberley Tee (KBT)
- Christchurch Tee (CHH)
- Springston Substation (SPN)

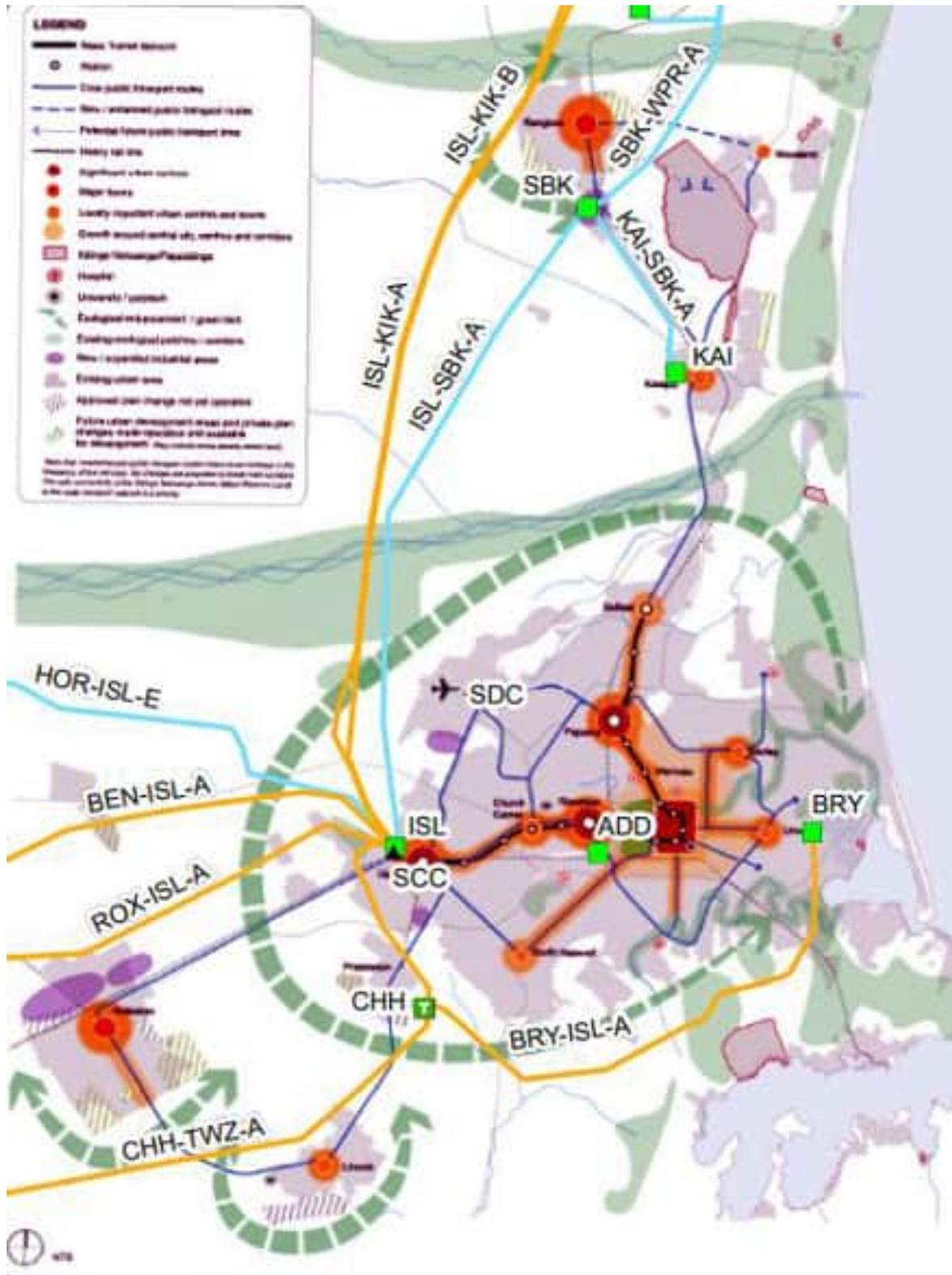
Christchurch City

- Islington-Deviation A (ISL-DEV-A) 66 kV Double Circuit on Steel Towers
- Islington-Kikiwa-A (ISL-KIK-A) 220 kV Single Circuit on Steel Towers
- Islington-Kikiwa-B (ISL-KIK-B) 220 kV Double Circuit on Steel Towers
- Islington-Southbrook-A (ISL-SBK-A) 66 kV Double Circuit on Steel Towers
- Bromley-Islington-A (BRY-ISL-A) 220 kV Double Circuit on Steel Towers
- Islington Substation (ISL), National Grid Operating Centre and National Grid Skills Training and Trial Facility

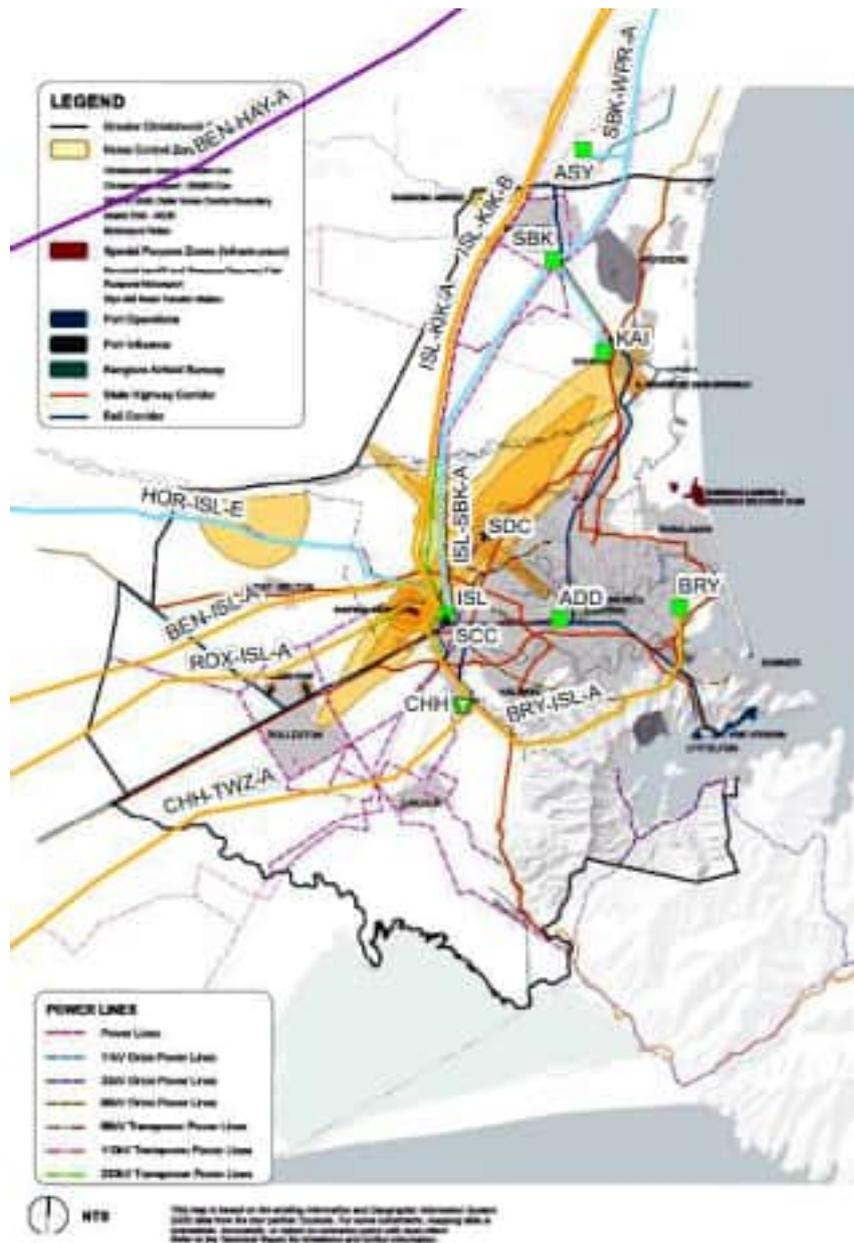
Waimakariri District Council

- Kaiapoi-Southbrook-A-CBL (KAI-SBL-A-CBL—CTS29A-KAI) 66 kV Underground Cable
- Kaiapoi-Southbrook-A (KAI-SBK-A) 66 kV Double Circuit Steel Tower
- Southbrook-Waipara-A (SBK-WPR-A) 66 kV Double Circuit Steel Towers
- Ashley Deviation-A (ASY-DEV-A) 66 kV Double Circuit Steel Towers
- Islington-Kikiwa-A (ISL-KIK-A) Single Circuit on Steel Towers
- Islington-Kikiwa-B (ISL-KIK-B) Double Circuit on Steel Towers
- Benmore-Hayward-A (BEN-HAY-A) 350kV Double Circuit on Steel Towers
- Ashley Substation (ASY)
- Southbrook Substation (SBK)
- Kaiapoi Substation (KAI)

National Grid Assets on draft Spatial Plan (Map 2)



National Grid Assets on Strategic Infrastructure Map 9



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Sarah **Last name:** Eveleigh

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Infinity Investment Group Holdings Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Submission - Infinity Investment Group Holdings - Spatial Plan

SUBMISSION
Greater Christchurch Spatial Plan

Submission of Infinity Investment Group Holdings Limited

To: Greater Christchurch Spatial Plan Consultation
 Greater Christchurch Partnership
 PO Box 73014
 Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Name of submitter: Infinity Investment Group Holdings Limited

Address: c/- Anderson Lloyd

[REDACTED]

[REDACTED]

[REDACTED]

Introduction

- 1 Infinity Investment Group Holdings Limited (**Infinity**) is a leading provider of residential developments within the South Island and has been operating for close to 25 years. Infinity's recent projects within Greater Christchurch include Pegasus Town, Ravenswood and Yaldhurst Park.
- 2 Infinity has demonstrated expertise in the successful provision of residential and commercial development that meets the needs of the community and contributes to a well-functioning urban environment. It also has particular knowledge of the factors that contribute to feasibility of development.

Submission

- 3 The draft Greater Christchurch Spatial Plan (**Spatial Plan**) recognises that in order to provide for an almost doubling of the population in Greater Christchurch in the next 60 years, to potentially 1 million people, the identification of where growth should go is critical. This is supported by Infinity.
- 4 However, the Spatial Plan makes insufficient provision for greenfield development within the Greater Christchurch region. The Spatial Plan's primary focus is on intensification within the existing urban area and it has not identified any new future urban development areas (**FUDA**) beyond those already identified through existing planning documents and processes.
- 5 Infinity submits that the approach taken by the Spatial Plan is contrary to the direction in the National Policy Statement on Urban Development 2020 (**NPS-UD**), and that the Spatial Plan fundamentally fails to meet the requirements of a Future Development Strategy (**FDS**).

Greater provision for greenfield growth is required

- 6 Intensification of existing urban areas, together with the limited provision for FUDAs in locations that have already been identified for future urban development, cannot meet the requirements of the NPS-UD.
- 7 In order to provide for a well-functioning urban environment under Policy 1 of the NPS-UD, Greater Christchurch needs to (among other matters):
- (i) have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households; and
 - (ii) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - (iii) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
 - (iv) support reductions in greenhouse gas emissions; and
 - (v) be resilient to the likely current and future effects of climate change.
- 8 The NPS-UD¹ directs local authorities to provide, as a minimum, sufficient development capacity at all times to meet expected demand for housing, in existing and new areas, and for both standalone dwellings and attached dwellings. In order to be *sufficient*, development capacity must be feasible and reasonably expected to be realised.
- 9 The identified FUDAs are primarily located around Rangiora, Rolleston and Lincoln. While it may be appropriate to enable growth around those major towns, they are located at the outer edge of the Greater Christchurch area. There is no greenfield growth identified or enabled in closer proximity to the identified 'significant urban centres' (Central City, Hornby, Riccarton and Papanui), although there is likely to be significant demand for greenfield housing in this location within the planning horizon addressed by the Spatial Plan. Instead, a focus on intensification will provide a limited housing type within Christchurch City, failing to meet the needs of different households; expected demand for housing (including in new areas, and for standalone dwellings); and failing to provide a well-functioning urban environment.
- 10 Failure to sufficiently identify additional locations for greenfield development will also fail to achieve the directions contained in the Spatial Plan, including:
- (a) Direction 4.2 - Ensure sufficient development capacity is provided or planned to meet demand;
 - (b) Direction 4.4 - Provide housing choice and affordability;
 - (c) Direction 4.5 - Deliver thriving neighbourhoods with quality development and supporting community infrastructure; and
 - (d) A low emissions future – through provision of greenfield housing options in close proximity to significant urban centres.
- 11 Intensification of existing urban areas requires a larger number of smaller infill developments. The fact that the Spatial Plan's reliance on intensification of existing urban areas to deliver housing capacity is unrealistic is clearly demonstrated in Figure 3 (page 21), which identifies that actual patterns of growth have provided a greater proportion of outward growth and lower

¹ Clause 3.2

proportion of intensification than intended. The Spatial Plan has failed to address the feasibility of achieving housing capacity as proposed. In developing the Spatial Plan, the Greater Christchurch Partnership has not sufficiently engaged with developers who understand where demand for housing lies, and who will play a significant role in delivering housing capacity.

- 12 Intensification also takes much longer to deliver housing capacity than greenfield development. It is fragmented in nature, the return on investment is harder to achieve, and it delivers only small increments in supply. Delays in bringing capacity to the market creates pent up demand which in turn produces inflationary pressures on property values, negatively impacting affordability. These are outcomes that the NPS-UD seeks to avoid. Greenfield developments have a balancing effect on these dynamics as it delivers more supply in a cohesive manner. They are therefore a critical component of achieving a well-functioning urban environment.
- 13 The focus on intensification of existing urban areas also fails to take advantage of the unique potential for greenfield development to provide higher density development supported by comprehensive urban design, delivered in a way that significantly contributes to housing capacity. Those outcomes are much harder to achieve through sporadic infill. While the potential for high density greenfield development is identified within the Spatial Plan,² that has not resulted in appropriate provision for or enabling of new greenfield areas.
- 14 The Spatial Plan does not identify any clear and achievable method to realise the extensive capacity that would otherwise be required through intensification. For example, in relation to *Direction 4.3 Focus and incentivise intensification of housing to areas that support the desired pattern of growth*, the Spatial Plan states:
- A key approach to targeting intensification in the preferred locations is to identify Priority Development Areas, which are areas that the partnership will take a coordinated effort at a given time. They provide a mechanism for coordinated and aligned action across multiple agencies; to inform, prioritise and unlock investment, and drive collective accountability.
- 15 Infinity agrees that intensification will be a contributor to housing capacity, but the rate and extent at which that can be achieved should be realistic, and it should not be incentivised by simply failing to provide for any greenfield development.
- 16 The maps within the Spatial Plan are focussed on delivering Direction 4.3 - Focus and incentivise, intensification of housing to areas that support the desired pattern of growth. In addition to failing to meet the requirements of Policy 1 and clause 3.2 of the NPS-UD, this does not give effect to Objective 3 NPS-UD which seeks to enable more people to live in areas of an urban environment in which there is a high demand for housing relative to other areas within the urban environment. The Greater Christchurch Partnership's "desired" growth has not appropriately considered where people want to live.
- 17 Future greenfield development is clearly anticipated by the NPS-UD. Greater provision for greenfield development is necessary to give effect the NPS-UD, and must be provided for within the Spatial Plan.

Future greenfield development areas should be broadly identified in the Spatial Plan

- 18 Whilst the Spatial Plan accepts that the greenfield areas will continue to be part of how the population can be accommodated, it does not identify where new greenfield areas should locate. The Spatial Plan states that³ *"Further additional greenfield development may be*

² Draft Greater Christchurch Spatial Plan at page 72

³ Draft Greater Christchurch Spatial Plan at page 72

required for the longer term and to provide for a population towards one million. Additional greenfield will be assessed through other statutory processes".

- 19 That approach does not achieve the purpose of a Future Development Strategy (**FDS**). Clause 3.13 of the NPS-UD specifies that purpose and content of an FDS, and provides that:

(1) The purpose of an FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

- 20 By not identifying broad locations where new development capacity will be provided over the long term, the Spatial Plan is deficient - it does not achieve the purpose of an FDS, and does not facilitate integrated provision of infrastructure.

- 21 The Spatial Plan proposes that "*locations for development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth*", and goes on to state that successful greenfield development will need to⁴:

(a) Be well connected with employment, services and leisure through public and active transport networks;

(b) Be integrated with existing urban areas;

(c) Meet a need identified by the latest Housing and Business Development Capacity Assessment; and

(d) Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.

- 22 Infinity supports a flexible and responsive approach to greenfield growth that achieve a well-functioning environment and align with criteria similar to those outlined above, and particularly supports the identification of locations for growth that are integrated with existing urban areas. However, Infinity is concerned that, as currently drafted, the Spatial Plan will constrain growth to within existing urban areas or the identified FUDA, and that other planning processes and

⁴ Draft Greater Christchurch Spatial Plan at page 72

documents such as Canterbury Regional Policy Statement and district plans would be constrained in their ability to provide for future greenfield development on the basis that this was not consistent with the Spatial Plan.

- 23 What is required is an approach that both identifies suitable indicative locations for future greenfield development, and retains flexibility to consider other opportunities to provide for growth to achieve a well-functioning urban environment.

Preferred locations for greenfield growth

- 24 Infinity considers that land located in proximity to the existing Yaldhurst Park development, to the south of State Highway 73 and west of State Highway 1 in Yaldhurst, is an appropriate location for future greenfield residential development. The land is adjacent to, and can be readily integrated with, the existing urban area. It is also in relatively close proximity to the identified 'significant urban centres' of Hornby and Riccarton. The Spatial Plan identifies that the land is also relatively close proximity to a core public transport route along State Highway 1. Infinity seeks that this land be included within identified broad locations for future greenfield development.

Protecting strategic infrastructure

- 25 Infinity considers that the current drafting, which seeks to avoid urban development around strategic infrastructure, is overly directive given the wide range of strategic infrastructure covered and range of potential effects. The current drafting does not recognise that there are a range of measures (such as acoustic insulation) to manage effects between strategic infrastructure and residential land use. Amendment is sought to enable the detail of appropriate measures to manage effects to be addressed through the regional policy statement and district plans.

Relief sought

- 26 Infinity seeks the following decisions:
- (a) Identification of areas for growth - that additional broad locations for future urban growth areas are identified on the maps (including Map 2), including land located adjacent to existing residential development in Yaldhurst, as indicatively shown on the first plan below, and specifically including Lots 20 & 21 DP 323203 and Lot 400 DP 562281 (shown on the second plan below).

Indicative broad location for growth area



Specific area to be included (shown in red, existing Yaldhurst Park development shown in green)

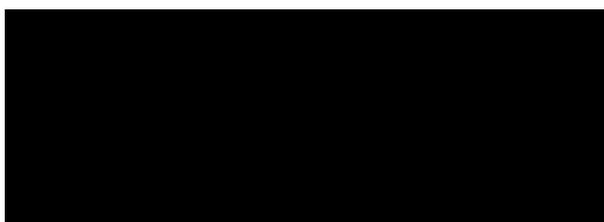


- (b) Redrafting of the Spatial Plan, and in particular text relating to Opportunity 4 (pages 68 – 75) to address the matters raised in this submission, to align with and give effect to the NPS-UD, and meet the requirements of a Future Development Strategy.

- (c) Amend the direction for *Protecting strategic infrastructure* (page 60) as follows:
 - (i) Appropriate measures should be applied ~~Urban development should be avoided~~ around strategic infrastructure to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure...
- (d) Such further or other consequential relief as may be required to give effect to this submission, including consequential amendments that address the matters raised by this submission.

27 Infinity wishes to be heard in support of this submission.

Dated 23 July 2023



Sarah Eveleigh
For Infinity Investment Group Holdings Limited

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Alex **Last name:** Booker

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Birchs Village Limited and WDL Enterprises Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Submission - GCSP - BVL

SUBMISSION
Greater Christchurch Spatial Plan

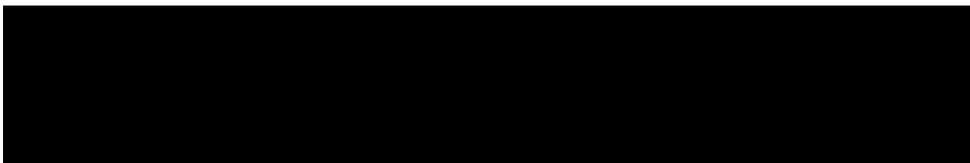
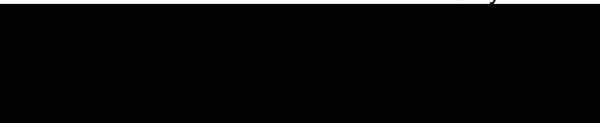
Submission of Birchs Village Limited and WDL Enterprises Limited

To: Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Name of submitter: Birchs Village Limited and WDL Enterprises Limited

Address: c/- Anderson Lloyd



Introduction

- 1 Birchs Village Limited and WDL Enterprises Limited (**the Submitter**) is a residential land developer in the Selwyn District and Christchurch City.
- 2 The Spatial Plan is a draft plan for consultation which sets out the vision for the future of Greater Christchurch, and a pathway for how the city will be a well-functioning urban environment. The Spatial Plan expressly acknowledges that coordinated action with infrastructure providers and the development sector will be of particular importance to enabling the type and scale of development needed to achieve "*the desired pattern of growth*", and "*it will be crucial that investments are aligned with the planned direction set out in the Spatial Plan*".
- 3 It is submitted it is important to understand the current proposed land development that has been signalled by developers in direct response to community demand and the National Policy Statement for Urban Development 2020 (**NPS-UD**). Currently, the Spatial Plan only focuses growth through targeted intensification in existing urban and town centres and along public transport routes, regardless of its short, medium and potential long-term feasibility. It assesses capacity across the entire Greater Christchurch area, and not within areas of high demand. It makes insufficient provision for greenfield development or criteria which would enable future growth, and only identifies areas for future development which have already been effectively confirmed through planning documents and captured in capacity figures.

- 4 It is submitted that such an approach is inadequate for a future focussed and strategy document and does not properly give effect to NPS-UD.

Submission

- 5 The Spatial Plan seeks to provide for the projected growth of Greater Christchurch in the next 60 years, which is essentially a doubling of today's population, to 1 million people. The Spatial Plan is informed by coarse capacity figures which are applied across the entire Greater Christchurch area, and are based on plan enabled and Council desired infill capacity, but not on actual feasibility.
- 6 The NPS-UD is designed to improve responsiveness¹ in decisions that affect an urban environment and recognises the national significance of:
- (a) having well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and in the future;
 - (b) providing *as a minimum* sufficient development capacity *at all times* to meet the different needs of people and communities².
- 7 A key method of achieving responsiveness in the NPS-UD, was to direct local authorities to be responsive to plan changes that would add significantly to development capacity, even if that capacity is unanticipated by RMA planning documents or out-of-sequence with planned land release (Policy 8).
- 8 For context, the Recommendations and Decisions report for the NPS-UD states, in relation to responsiveness³:

Urban areas are dynamic and complex, continually changing in response to wider economic and social change. **The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply or incentivise land banking.** The intent of the responsive planning provisions in the National Policy Statement on Urban Development (NPS-UD) is to:

- enable the planning system to work responsively towards more competitive development markets, through developments at scale
 - **ensure that plan change requests are considered on their own merits, irrespective of infrastructure funding constraints, and to ensure that decision-making supports developments that are of scale and contribute to well-functioning urban environments.**
- ...

¹ NPS-UD Objective 6

² Such as type, price and location of households (NPS-UD, Policy 1(a)(i)).

³ Ministry of Housing and Urban Development and Ministry for the Environment *Recommendations and decisions report of the National Policy Statement on Urban Development*: <https://environment.govt.nz/assets/Publications/Files/Recommendations-and-decisions-report-NPS-UD-final.pdf>, at [59].

The [responsiveness] policy would recognise the benefits of plan changes that would add significantly to development capacity and contribute to well-functioning urban environments. Because the intent is responsiveness in the planning system, this would apply to both greenfield and brownfield developments. Significance would be determined by councils and could include development capacity significant to Māori that contributes to a well-functioning urban environment and has the necessary transport connections.

- 9 It is submitted, the Spatial Plan is inconsistent with the NPS-UD, for example:
- (a) Direction 4.2 - Ensure sufficient development capacity is provided or planned to meet demand. This does not reflect the NPS-UD requirement to provide *at least* sufficient *feasible* development capacity at all times, and needs to be amended.
 - (b) Direction 4.3 - Focus and incentivise intensification of housing to areas that support the *desired* pattern of growth. This does not give effect to Objective 3 NPS-UD which seeks to enable more people to live in areas of an urban environment in which there is a high demand for housing relative to other areas within the urban environment. The Submitter is concerned that Council "desired" growth has not appropriately considered actual demand from the development community, where people want to live, or demonstrated how it will actually achieve the extensive capacity said to be achieved through intensification of existing urban areas. Direction 4.3 should be deleted. The rate and extent which intensification can be achieved should be realistic, and it should not be incentivised by failing to provide for other development in areas of demand (such as greenfield development), effectively reinforcing the urban boundary of the Regional Policy Statement.
 - (c) Direction 4.4 - Provide housing choice and affordability. The focus on intensification of existing urban areas fails to take advantage of the unique potential for greenfield development to provide higher density development supported by comprehensive urban design, delivered in a way that significantly contributes to housing capacity. Those outcomes are much harder to achieve through sporadic infill. Figure 9 of the Spatial Plan shows that demand for housing capacity in Selwyn is outstripping supply. No new Future Urban Development Areas (**FUDA**) have been identified beyond those that currently exist. Direction 4.4 needs to be amended to specifically provide for recognition of greenfield development.

The provision for new greenfield areas:

- 10 Given the significant anticipated population growth for Greater Christchurch, the identification of where growth should go is critical, and the use of the Spatial Plan for this purpose is supported by the Submitter.
- 11 In order for Greater Christchurch to provide for a well-functioning urban environment under Policy 1 of the NPS-UD, Greater Christchurch needs to have or enable a variety of homes that, relevantly:
- (a) meet the needs, in terms of type, price, and location, of different households;
 - (b) enable Maori to express their cultural traditions and norms;
 - (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - (d) support, and limit, as much as possible adverse impacts on, the competitive operation of land and development markets; and

- (e) support reductions in greenhouse gas emissions; and
 - (f) are resilient to the likely current and future effects of climate change.
- 12 Intensification alone cannot meet the requirements of the NPS-UD, and the provision of greenfield development is required to satisfy Direction 4.4 to provide housing choice and affordability, along with providing thriving neighbourhoods with quality developments supporting community infrastructure as required by Direction 4.4. Adopting a key focus on intensification and existing FUDA's fails to take a forward-looking approach to providing for growth in Greater Christchurch and does not give effect to the NPS-UD.
- 13 The GCSP explains that *"the broad locations for residential growth are shown in Map 14 under Opportunity 5. The Priority Development Areas will also be a significant tool to incentivise redevelopment and higher density housing (see the collective focus on unlocking the potential of Priority Areas section). Further to this, locations for development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth."*⁴
- 14 Whilst the GCSP accepts that the greenfield areas will continue to be part of how the population can be accommodated whilst providing a range of lifestyle choices it does not identify where new greenfield areas should locate and therefore fall outside the desired pattern of growth identified by the GCSP.
- 15 This will result in other relevant strategic planning documents such as the Canterbury Regional Policy Statement and district planning documents being constrained in where FUDA's can be provided across Greater Christchurch.
- 16 The GCSP also fails to identify significance criteria for greenfield development, while providing some commentary on what this could be. The GCSP states that successful greenfield development will need to⁵:
- (a) be well connected with employment, services and leisure through public and active transport networks;
 - (b) be integrated with existing urban areas;
 - (c) meet a need identified by the latest Housing and Business Development Capacity Assessment; and
 - (d) be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.
- 17 It is submitted:
- (a) it is unacceptable and inappropriate to require greenfield development to be demonstrated against the latest Housing and Business Development Capacity Assessment, as this would be at the control of Council and not appropriately provide for private developer lead plan changes pursuant to Policy 8 NPS-UD.
 - (b) a requirement for greenfield development to be integrated with existing urban areas is also inappropriate and does not give effect to the NPS-UD. Policy 8 NPS-UD directs local

⁴ Draft Greater Christchurch Spatial Plan at page 69

⁵ Draft Greater Christchurch Spatial Plan at page 72

authorities to be responsive to plan changes providing development capacity that are unanticipated by RMA planning documents or out-of-sequence with planned land release.

- (c) requiring urban development density and scale to protect primary production and highly productive land doesn't reflect the effectiveness or appropriateness of mitigation measures and design. The focus should be on managing effects of the activity.

Prebbleton

- 18 Prebbleton has recently undergone significant development to its town centre which is not recognised and appropriately identified within the Spatial Plan. No identifying Prebbleton as a centre in the Spatial Plan is inconsistent with Prebbleton's identification by Selwyn District Council as an urban environment that had to incorporate the Medium Density Residential Standard within relevant residential zones through Variation 1 to the Proposed Selwyn District Plan. Prebbleton's commercial area has also being proposed to be upgraded from a Local Centre to a Town Centre Zone, to bring it in line with Rolleston and Lincoln. Accordingly, it is submitted that Prebbleton should be identified as a major town or alternatively, a locally important urban centre and town like Lincoln.
- 19 This submitter has made a private plan change request to rezone approximately 37 ha of land from Rural Inner Plains to Living Medium Density Prebbleton Zone in an area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton. Ngāi Tahu NTP Development Holdings Limited (NTP) is partnering with the Submitter to progress the development of this Site. Should the rezoning be successful, NTP will become the future developer of Birchs Village in Prebbleton.
- 20 It would be a logical extension of the Prebbleton township boundary to include this Site, with the waterway and pylons directly to the south and southeast (creating a logical urban edge) and Kakaha Park across the road. The site is 1.8km to the Prebbleton town centre and is located on a priority bus route soon to be upgraded to every 15mins, it has the cycle path directly past it allowing access from Little River to Christchurch CBD and on to the Waimakariri River, with this now becoming a more viable and environmentally friendly option for all ages to travel, with the introduction of E-Scooters and E-Bikes.
- 21 Kakaha Park, a significant investment for the community which is partially constructed and funded, is simply not included in the Spatial Plan at all. Kakaha Park contains sports fields (rugby, football, cricket), a bike track linked to the Rail Trail, dog park and casual recreation (such as diverse play/native planting to explore). As publicly stated by Council staff, Kakaha Park is designed as a unique park which seeks to *"give people a space to make their own fun and enjoy nature"* and *"most importantly though, parks and reserves provide a space for people to enjoy nature, socialise and play – all of which helps people's mental and physical health and wellbeing and strengthens community."*⁶
- 22 It is submitted with respect to Prebbleton:
 - (a) it should be included as a Priority Development Area, including due to its proximity to key employment centres (industrial and commercial on Map 13) and the strategic growth of Prebbleton should be identified as south towards (and covering) the new Kakaha District Park;

⁶ <https://yoursay.selwyn.govt.nz/birchs-rd-park>; and <https://www.stuff.co.nz/the-press/news/mid-canterbury-selwyn/126654755/work-starts-on-new-canterbury-nature-reserve-and-sports-park>

- (b) its urban form should be updated to include all the new and proposed plan change areas and the new Kakaha Park (as open space on Map 10);
 - (c) all lifestyle blocks on the periphery of Prebbleton (already irreversibly fragmented) should be excluded from Highly Productive Land, and Direction 3.4 needs to be amended to ensure it is clear that the Map 12 is not determinative of what land will be determined to be Highly Productive Land by the Regional Council;
 - (d) is notably excluded from areas to Protect and Avoid (Map 5) (c.f. with the identified growth area of Hornby which is covered by an area to Protect and Avoid);
 - (e) Is historically and is still today, a very popular suburb for development. More people are to be enabled to live in areas of urban environment where there is a high demand for housing (i.e. Prebbleton) relative to other areas within the urban environment (Objective 3 NPS-UD); and
 - (f) as an area of high demand, on transport routes (including rail on Map 9), and with a new District Park, there will be significant investment from private property developers including the Submitter⁷, and the ability to achieve significant development capacity.
- 23 Specifically, the Submitter seeks that the area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton and adjacent to Kakaha Park (legally identified as Lot 1 DP 407808; Lot 2 DP 29035, Lot 1 DP 43993, Lot 2 DP 43993; Lot 2 DP 42993, Lot 3 DP 29035; Lot 1 DP 21433, Lot 1 DP 27551, Lot 2 DP 27551, Lot 1 DP 344727, and Lot 2 DP 344727) is included as a FUDA in the Spatial Plan. The relevant documents to support this area for growth can be found here:
<https://extranet.selwyn.govt.nz/sites/consultation/PartA/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FPartA%2FShared%20Documents%2F9%2E%20Prebbleton%20Hearing%2FSubmitter%20evidence%2FV1%2D0066%20Birchs%20Village%20Limited&FolderCTID=0x01200016965B9A3519B441A4294380705B7839&View=%7B73CF424E%2DA026%2D458B%2DB015%2D6AF09399D47A%7D>

Other matters

Papanui as a significant urban centre

- 24 The Submitter supports the identification of Papanui as a significant urban centre in the GCSP. It is considered this is an appropriate identification given the key strategic role Papanui has continued to play following the earthquakes, and the significant development that has occurred.
- 25 The identification of the mass transport network is supported and considered appropriate to service this significant urban centre, and it is appropriate the provision is made for residential and commercial development in this area.
- 26 We note that there is a significant portion of land adjacent to the Papanui centre and surround by existing urban areas that is not zoned for urban development. It appears that this includes land owned by the Submitter (legally identified as Part Lot 5 DP 1729, Part Lot 3 DP 1729, Part Lot 4 DP 1729, Part Lot 1 DP 1729, Part RS 308, Lot 2 DP 1729 and Section 4 SO 509157) which has been identified in the Christchurch City Council Plan Change 14 as Future Urban Zone. It seems inconsistent with the identification of Papanui as a significant urban centre that this land (which is part of a larger area of land not part of the existing urban area) located in close proximity to

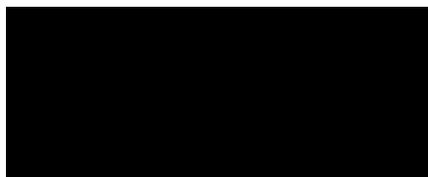
⁷ This is demonstrated by the number of recent private plan changes in the area, and submissions on the Proposed Selwyn District Plan.

Papanui, the mass transport network route and a core public transport route is not identified as appropriate for urban development. Accordingly, the Submitter seeks that this land is identified in the GCSP as a FUDA.

Relief sought

- 27 The Submitter seeks the following decisions:
- (a) that changes are made to the Spatial Plan to ensure it gives effect to the NPS-UD;
 - (b) that changes are made to the Spatial Plan to address matters raised in this submission;
 - (c) that the following sites are included as additional future urban development areas are identified in the GCSP, including the following Sites:
 - (i) Prebbleton - Area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton adjacent to Kakaha Park (legally identified as Lot 1 DP 407808; Lot 2 DP 29035, Lot 1 DP 43993, Lot 2 DP 43993; Lot 2 DP 42993, Lot 3 DP 29035; Lot 1 DP 21433, Lot 1 DP 27551, Lot 2 DP 27551, Lot 1 DP 344727, and Lot 2 DP 344727)
 - (ii) Papanui - Grassmere Street, Papanui (legally identified as Part Lot 5 DP 1729, Part Lot 3 DP 1729, Part Lot 4 DP 1729, Part Lot 1 DP 1729, Part RS 308, Lot 2 DP 1729 and Section 4 SO 509157); and
 - (d) that Prebbleton is identified as a major town or alternatively, a locally important urban centre and town in the GCSP.
 - (e) Such further or other consequential relief as may be required to give effect to this submission, including consequential amendments that address the matters raised by this submission.
- 28 The Submitter wishes to be heard in support of this submission.

Dated the 23rd day of July 2023



Alex Booker

Counsel for Birchs Village Limited and WDL Enterprises Limited

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Toni **Last name:** Pengelly

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
GCSP Submission - TONI PENGELLY

[REDACTED]

From: Huihui Mai
Sent: Monday, 24 July 2023 2:46 pm
To: MonitorSubmissions
Subject: FW: OBJECTION to the Greater Christchurch Spatial Plan

From: Toni Pengelly [REDACTED]
Sent: Sunday, July 23, 2023 11:34 PM
To: Huihui Mai [REDACTED]
Subject: OBJECTION to the Greater Christchurch Spatial Plan

To Whom It May Concern
The form was not visible on my laptop nor my other device.

TONI PENGELLY

[REDACTED]
[REDACTED]
[REDACTED]

Please accept this as my OBJECTION to the proposed SPATIAL PLAN FOR CHRISTCHURCH

1. I COMPLETELY REJECT AND OPPOSE ANY PREPARATION, PLANNING AND IMPLEMENTATION OF "15 MINUTE CITIES" CONTAINED WITHIN THIS DOCUMENT
2. BUILDING HEIGHTS SHOULD BE LIMITED TO A MAXIMUM OF 4 FLOORS IN ANY CITY AREA. THE PROPENSITY FOR EARTHQUAKES IN CHRISTCHURCH WOULD RESULT IN A VERY HIGH RISK OF SIGNIFICANT FURTHER LOSS OF LIFE, PROPERTY AND RESOURCES OF THE NATION
3. CURRENT CHANGES TO ROADS TO REDUCE SPEEDS, PLACE BARRIERS AND BUILD MORE CYCLEWAYS IS DELETARIOUS TO THE FREE MOVEMENT AND EASE WITH WHICH PEOPLE CAN SAFELY MOVE WITHIN CITY. THE DUTY OF THE CHRISTCHURCH CITY COUNCIL IS TO PROVIDE BENEFICIAL SOLUTIONS TO PROBLEMS NOT CREATE THEM ACCORDING TO UN AGENDA 2030 AND THE DEMANDS OF UNELECTED GLOBALISTS WHO ARE DECONSTRUCTING THE UNIQUE CHARACTERISTICS AND SOVEREIGNTY OF OUR NATION.
4. MAY I RESPECTFULLY REMIND THE COUNCIL AND ITS BUREAUCRATS THAT YOU ARE ELECTED AND EMPLOYED TO SERVE THE RESIDENTS OF THIS CITY NOT AN INTERNATIONAL NON- ELECTED AND UNACCOUNTABLE ORGANISATION
5. I AM COMPLETELY OPPOSED TO THE USE OF CHLORINE AND FLUORIDE IN OUR PURE ARTESIAN WATER SUPPLY. THESE ARE BOTH HARMFUL TO HEALTH AND AN UNNECESSARY AND OBJECTIONABLE EXPENSE TO THE RATEPAYERS OF CHRISTCHURCH.
6. RATEPAYERS HAVE NOT CONSENTED TO AND IN FACT OBJECT TO CONSISTENT BUDGET BLOWOUTS AND EXPENDITURE ON UNNECESSARY PROJECTS SUCH AS EXTENSIVE CYCLEWAYS AND THE MONSTROSITY IN OUR INNER CITY PRECINCT OF A STADIUM WHICH SHOULD HAVE BEEN BUILT OUTSIDE OF THE CITY. IT IS HIGHLY INTRUSIVE, USED BY ONLY A SMALL NUMBER OF RATEPAYERS AND A COMPLETELY UNNECESSARY INCLUSION IN Christchurch's city plan.
7. "TO PROTECT, RESTORE AND ENHANCE HISTORIC HERITAGE AND SITES AND AREAS OF SIGNIFICANCE TO MAORI ". CHRISTCHURCH HAS TWO PREDOMINANT CULTURAL HERITAGE ASPECTS: BRITISH AND MAORI. I STRONGLY OBJECT TO ONE CULTURE GAINING PRE-EMINENCE OVER THE WHOLE WHETHER IT IS BRITISH OR MAORI. I CALL FOR THE COUNCIL TO RECTIFY THE ABSENCE OF THE MENTION OF OUR HISTORICAL VALUE AND COMMITMENT TO THE BRITISH ROOTS OF OUR CITY AND CALL FOR AN AMMENDMENT TO THIS ASPECT OF THE PLAN.

Given the lack of advertising of the call for submissions on this Plan my Objections have had to be hastily written. However I would like to be called for the physical presentation of my objections in the course of the council's deliberations on these matters.

Yours sincerely
Toni Pengelly

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Alex **Last name:** Booker

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Foodstuffs (South Island) Properties Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Submission - Greater Christchurch Spatial Plan - Foodstuffs

SUBMISSION
Greater Christchurch Spatial Plan

Submission of Foodstuffs (South Island) Properties Limited

To: Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Name of submitter: Foodstuffs (South Island) Properties Limited

Address: c/- Anderson Lloyd

[REDACTED]

[REDACTED]

[REDACTED]

Introduction

- 1 Foodstuffs is a retailer owned co-operative company and the wholesale supplier to retail brands such as PAK'nSAVE, New World, Four Square, Raeward Fresh and On-the-Spot. Foodstuffs (South Island) Properties Limited is a property holding company and wholly owned subsidiary of parent company Foodstuffs. Foodstuffs' activities in the Greater Christchurch area range from small retail stores to mid-size stores in shopping centres to large format retailing in supermarkets to industrial wholesaling, as well as a host of ancillary activities.
- 2 Supermarkets (including associated access and car parking areas) are of a functional nature, design and scale that distinguish them from most other activities in a commercial area. Amenity can be achieved through landscaping, building setbacks, variations in frontages, discrete loading operations, and safe and legible pedestrian access that enable functional supermarket developments to be established in a way that takes account of site-specific circumstances. Foodstuffs prides itself on supermarket operations that are planned in a way that is both practical and achieves high quality design and amenity outcomes.
- 3 Supermarkets provide an essential service for all New Zealanders as they ensure everyone has access to everyday essential grocery items required by consumers. Supermarkets also play a critical role during emergency situations including support in times of crisis such as natural disasters. This "essential" function came to the fore during the Covid-19 pandemic where government sanctioned supermarkets to open as an essential service, so that consumers had seamless access to food and other groceries.

Submission

- 4 The Greater Christchurch Spatial Plan (**GCSP**) is a draft plan for consultation which sets out the vision for the future of Greater Christchurch, and a pathway for how the city will be a well-functioning urban environment. The Spatial Plan expressly acknowledges that coordinated action with infrastructure providers and the development sector will be of particular importance to enabling the type and scale of development needed to achieve the desired pattern of growth, and *"it will be crucial that investments are aligned with the planned direction set out in the Spatial Plan"*.
- 5 Foodstuffs is concerned that the GCSP in its current form does not give effect to the National Policy Statement for Urban Development 2020 (**NPS-UD**). The NPS-UD is designed to improve responsiveness¹ in decisions that affect an urban environment and recognises the national significance of:
- (a) having well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and in the future;
 - (b) providing *as a minimum* sufficient development capacity *at all times* to meet the different needs of people and communities.
- 6 The NPS-UD requires a well-functioning urban environment to, as a minimum, enable suitable sites (in terms of both location and size) for business activities to be realised and supported by an associated policy framework. Businesses should be built in places close to jobs, community services and public transport and where they respond to market demand. The GCSP needs to be future focussed, and needs to have sufficient flexibility for planning instruments to be able to be responsive.
- 7 For context, the Recommendations and Decisions report for the NPS-UD states, in relation to responsiveness²:
- Urban areas are dynamic and complex, continually changing in response to wider economic and social change. **The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply or incentivise land banking.** The intent of the responsive planning provisions in the National Policy Statement on Urban Development (NPS-UD) is to:
- enable the planning system to work responsively towards more competitive development markets, through developments at scale
 - ensure that plan change requests are considered on their own merits, irrespective of infrastructure funding constraints, and to ensure that decision-making supports developments that are of scale and contribute to well-functioning urban environments.
- 8 Foodstuffs is particularly interested in Opportunity 5 of the Spatial Plan. This seeks to provide space for businesses and the economy to prosper in a low carbon future. However, Directions 5.1-5.2 focus on integration with transport links and the centres networks – a very limited area.

¹ NPS-UD Objective 6

² Ministry of Housing and Urban Development and Ministry for the Environment *Recommendations and decisions report of the National Policy Statement on Urban Development*: <https://environment.govt.nz/assets/Publications/Files/Recommendations-and-decisions-report-NPS-UD-final.pdf>, at [59].

9 Direction 5.1 provides:

Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network

10 While Foodstuffs generally supports Direction 5.1 as a primary focus, there are also a range of commercial activities outside of the transport links and centres networks. Supermarkets have specific operational and functional needs which often see them located in residential urban areas in direct response market need. Examples of this include New World St Martins, New World Ilam and the recently consented Pak'n'Save Rolleston.

11 The commentary for Direction 5.1 provides:

Enough commercial land is also supplied in Christchurch, Selwyn and Waimakariri to meet demand over the next 10 years, but there is a shortfall of 110ha in Christchurch and 20ha in Selwyn when looking over the next 30 years. Shortfalls in commercial land are expected to be met through intensification in significant urban centres, major towns, as well as rezoning of industrial land close to Christchurch's Central City to commercial and mixed-use. A focus for providing for commercial land will be those areas identified in Map 14, including the Priority Areas.

12 The assessment of capacity of commercial land in the Spatial Plan does not accurately reflect the market reality for Foodstuffs activities. By way of example, Foodstuffs has very recently gone through the Proposed Selwyn District Plan process. During the hearing, the economists representing both Foodstuffs and the Council both agreed there is demand for several additional district supermarkets and that there is *insufficient space* to accommodate them within existing centres, and there was no scope to provide rezoned commercial land for supermarkets through that process and submissions. There is a need and demand for supermarket activities to support residential catchments, and a need to provide for new commercial zones to support intensification.

13 For the GCSP to only encourage and enable commercial development within centres and transport corridors means that a range of commercial activities may not be enabled. These commercial activities range from small retail shops and services like dairies, florists and hairdressers to large format retailers such as supermarkets. These commercial activities primarily service the surrounding community and so they should be acknowledged and supported in the GCSP as well. There should also be express acknowledgement in the Spatial Plan that commercial activities with functional or operational needs can still support a centre through locating outside and near them.

14 Direction 5.2 provides:

A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services

15 It is unclear how Direction 5.2 will be implemented and what it practically means for a commercial activity. For example, will it mean a new commercial activity such as a supermarket (which is the equivalent to a local centre in Christchurch City under PC14) needs to demonstrate its value against the Greater Christchurch centre's network? What economic assets are being leveraged and how? It is also unclear why the GCSP does not align with the treatment of urban areas in the district plans (applying the National Planning Standards terminology) which require councils to apply the 'centres hierarchy' from neighbourhood centres up to city centre zones, and why GSCP only identifies 14 centres across the entire Greater Christchurch area.

16 Policy 3 of the NPS-UD requires Greater Christchurch to have or enable intensification around neighbourhood, local and town centre zones in order to provide services for communities and to reduce greenhouse gas emissions from private car travel. This is reflected in Direction 4.3 the residential growth perspective. However, the GCSP needs to provide for the corresponding commercial activity within communities to meet the growth in needs.

17 At the high level of a spatial plan, it is not necessary to identify every one of these commercial activity centres. However, it is necessary to acknowledge that not all commercial activity is required nor should be located in the centres as identified in the GCSP.

18 Foodstuffs submit the following Directions should replace Direction 5.1:

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

Encourage commercial and industrial uses to be integrated with transport links and centres.

Ensure sufficient land is provided for commercial and industrial uses with functional or operational needs, including outside of the centres network.

Spatial Plan structure and future focus

19 The Spatial Plan appears to be a Future Development Strategy (**FDS**) but in its current form it is deficient in the mandatory requirements of a FDS.

20 Clause 3.13 of the NPS-UD specifies that purpose and content of an FDS, and provides that:

(1) The purpose of an FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

21 Clause 3.3 of the NPS-UD is relevant to sufficient development capacity for business land (emphasis added):

(1) Every tier 1, 2, and 3 local authority must provide **at least** sufficient development capacity in its region or district to meet the **expected demand for business land**:

(a) from **different business sectors**; and

(b) **in the short term, medium term, and long term.**

In order to be **sufficient** to meet expected demand for business land, the development capacity provided must be:

- (a) plan-enabled (see clause 3.4(1)); and
 - (b) infrastructure-ready (see clause 3.4(3)); and
 - (c) **suitable** (as described in clause 3.29(2)) **to meet the demands of different business sectors** (as described in clause 3.28(3)); and
 - (d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22).
- 22 The Spatial Plan doesn't provide for sufficient development capacity over the short, medium and long term, including for different business sectors. Only a coarse (as opposed to fine grain) analysis of capacity is provided in the Spatial Plan. By not identifying broad locations where needed new development capacity will be provided over the long term it does not achieve the purpose of an FDS. It also does not meet other requirements of a FDS for review and implementation. The Spatial Plan lacks flexibility and seems to be simply mostly showing the existing urban areas and approved rezoned areas. There are no measurable actions or measurements of whether it does (or can) achieve feasible future development.
- 23 When it comes to implement the Spatial Plan through the lower order planning documents, and if it has been determined there is insufficient development capacity (as described in 3.3 above), Clause 3.7 requires a change to RMA planning documents asap and a local authority must consider other options for increasing development capacity and otherwise enabling development. This is the future vision that needs to be provided now in the Spatial Plan.

Other matters

- 24 *South Christchurch growth* - Foodstuffs supports the recognition of South of the Central City as a key business area. Map 2, showing the locations of growth capacity for the 1 million population projection, recognises the Colombo Street corridor as a growth area. Map 14, showing growth capacity for 700,000 people, does not recognise this corridor and should. A growth area should be provided for South Christchurch, something that is currently absent from Map 14.
- 25 *Rolleston centre* - The growth area on Map 14 for Rolleston should be extended to include 157 Levi Road which includes the recently consented Pak'nSave Rolleston.
- 26 *Office activity in industrial areas* - Foodstuffs supports the use of industrial land for commercial activity associated with an industrial use (such as accompanying offices) as a way to provide additional land suitable for commercial activities.
- 27 *Reverse sensitivity* - Opportunity 4 focusses on giving effect to the residential intensification directed by Policy 1 of the NPS-UD. Foodstuffs is supportive of well-planned residential growth and intensification. It is concerned that in some instances it has the unintended consequence of constraining the efficient use of limited business land.

For example, Supermarkets have specific operational and functional requirements which include delivery vehicles movements and associated noise, large store sizes; generators and other specialised equipment; car park, signage and store lighting to ensure the safety and security of staff and customers at night; and longer operational hours. Where new residential activity and growth is proposed in close proximity to commercial activities it should be recognised that this may detract from amenity values appreciated by some people but this is not to be considered an adverse amenity effect.

Protection from reverse sensitivity is done well in relation to the effective operation of the freight network in Direction 6.5. Ensuring there are no reverse sensitivity effects on the freight network from residential development is vital.

Date: 21 July 2023



Alex Booker for Foodstuffs (South Island) Properties Limited

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Humphrey **Last name:** Tapper

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Tapper Family Trust

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
draft Greater Christchurch Spatial Plan - Tapper Family Trust - Submission

Before the Committee

In the matter of: the draft Greater Christchurch Spatial Plan

Between: **Christchurch City Council**

Consent Authority

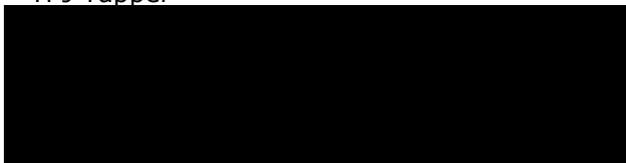
And: **Tapper Family Trust**

Submitter

Submissions on behalf of Tapper Family Trust

23 July 2023

H J Tapper



**SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL
PLAN**

To: Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email only: huihuimai@greaterchristchurch.org.nz

Name: Tapper Family Trust
[REDACTED]
[REDACTED]

Attention: H J Tapper
[REDACTED]
[REDACTED]

The Tapper Family Trust (the Trust) makes the general and specific submissions on the draft Greater Christchurch Spatial Plan as set out in the attached document.

The Trust confirms its submission does not relate to trade competition or the effects of trade competition.

The Trust would like to be heard in support of its submission.

If other persons make a similar submission the Trust would consider presenting joint evidence at the time of the hearing.

[REDACTED]

H J Tapper

For and behalf of the Tapper Family Trust

Dated 23rd July 2023

BACKGROUND

- 1 This submission is made in relation growth and development on the Port Hills and protection afforded to it pursuant to the draft Greater Christchurch Spatial Plan (the draft Spatial Plan).
- 2 The Trust owns land at 133 and 137 Huntsbury Avenue on the Port Hills being comprised within Certificate of Titles 283237 and 283238 being Lots 2 & 3 DP 369793 and approximately 2.68ha in area (the Land).
- 3 The Land is partly zoned Living Hills with the lower slopes of the eastern side zoned Rural Hills under the Christchurch City Plan. The area zoned Living Hills is relatively clear while the remainder of the site being zoned Rural Hills largely consists of exotic pine.

DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

- 4 The draft Spatial Plan was notified on 19 June.
- 5 The Trust is generally supportive of the draft Spatial Plan however it seeks better recognition of development potential of appropriate areas on the Port Hills where appropriate.

KEY ISSUES

- 6 The Trust seeks recognition within the draft Spatial Plan that growth and intensification on the Port Hills, 'in pockets' is appropriate. For example, where such growth is readily able to be absorbed i.e., those locations surrounded by existing development, being below ridge lines and with no prominence or significance be acceptable.

RATIONALE

- 7 The Trust considers the focus on Priority Development Areas within the draft Spatial Plan is too restrictive. It misses an easy opportunity to provide a general direction or signal towards the infilling on the Port Hills where appropriate. That is, the blanket restrictions proposed on the Port Hills in accordance with *Part 1 – Areas to protect, avoid and enhance* seem disproportionate and may arbitrarily and unnecessarily restrict growth in places where it is acceptable to do so. This is especially the situation where such areas are located close to the City Centre and with the ability to utilise existing infrastructure.
- 8 In this regard we note the Hon David Parker as Minister for Environment in moving that the Natural and Built Environment Bill be read a second time stated:

"...

Consenting costs have ballooned and urban land prices soared. Overly restrictive planning rules have hindered much-needed housing and other development. No one is enforcing intensification, but plans have prevented people doing what they wanted and the country needs.

...”

- 9 Accordingly, we believe providing some balance to intensification/infilling within appropriate pockets of the Port Hills in the draft Spatial Plan would:
- (a) address a practical need to access land for housing;
 - (b) allow growth that is acceptable to the community;
 - (c) be more sustainable due to the location being within the existing urban environment;
 - (d) be efficient by utilising land already available;
 - (e) improve resilience (by spreading development across the various available pockets on the Port Hills);
 - (f) provide broader sustainable management gains; and
 - (g) help reduce the effects of climate change;
- 10 Further we consider the recognition of parts of the Port Hills would create linkages to the network of green spaces for relaxation and recreation on the Port Hills. Overall it would promote and enhance the social economic and cultural well-being of the community.
- 11 The Trust also seeks the draft Spatial Plan be made in accordance with the Natural and Built Environment Bill and Spatial Planning Bill.

RELIEF

- 12 At page 51 of the draft Spatial Plan:

Layering all the areas to protect and avoid on top of each other highlights the most constrained areas of Greater Christchurch for development (see Map 5). These areas generally include the eastern areas along the coastline, the Port Hills and Te Pātaka a Rākaihautū / Banks Peninsula, the areas to the north-west of Christchurch, and the areas surrounding Kaiapoi. These parts of the city region are affected by a variety of natural and man-made factors. The presence of Wāhi Tapu, Wāhi Taonga and Ngā Wai are also matters of further significance, where any urban encroachment will require engagement with and

consideration by mana whenua. In noting the above there may be pockets of landholdings within the Port Hills that are appropriate for development and that may be readily absorbed within the environment. In particular infilling and intensification of parts of the Port Hills may occur where considered appropriate.

13 At page 52 of the draft Spatial Plan remove any part of the Land from Map 5: Areas to protect and avoid.

14 At page 63 of the draft Spatial Plan:

Direction

3.1 Avoid development in areas with significant ~~natural~~ indigenous values

15 That in relation to timing the draft Spatial Plan be made in accordance with the Natural and Built Environment Bill and Spatial Planning Bill.

16 In addition to all the above, the following relief is also sought:

- (i) Any additional or alternative relief that achieves the same or similar outcome;
- (ii) Consequential or ancillary changes to the above or global amendments as required
- (iii) Such further relief as may be necessary or appropriate to address the reasons of this submission or to give effect to the relief sought

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Lucy **Last name:** Forrester

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Carter Group Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Carter Group submission on Spatial Plan

SUBMISSION OF CARTER GROUP LIMITED ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

INTRODUCTION

- 1 Carter Group Limited (*Carter Group*) welcomes the opportunity to submit on the Greater Christchurch Partnership's (*GCP*) draft Spatial Plan (the *draft Spatial Plan*).
- 2 Carter Group is a privately owned property investment company based in Christchurch. It is a third-generation company, originally founded by my grandfather Maurice Carter in 1946, and run by Philip Carter since the 1980s. Carter Group is a significant investor and developer of property in the South Island.
- 3 Carter Group has a strong affiliation with Christchurch's central city and has contributed to, and continues to contribute to, the regeneration of the central city following the Canterbury earthquakes of 2011.
- 4 Carter Group's investments include hotels, residential property, commercial property, industrial property and central city property, such as:
 - 4.1 The Crossing, a retail centre in the heart Christchurch Central City;
 - 4.2 The Kathmandu flagship retail store;
 - 4.3 IPort, a large scale industrial subdivision in Rolleston, adjacent to Midland Port;
 - 4.4 The Station, a substantial large format retail centre alongside IPort, that has obtained all relevant consents and is in the early stages of development;
 - 4.5 Advancing plans for a five-star hotel adjoining Te Pae; and
 - 4.6 Other hotel investments in both Queenstown and Melbourne.
- 5 Increasingly Carter Group has been investing in developments, largely industrial and residential, in the Selwyn and Waimakariri District. These include:
 - 5.1 Private Plan Change 66 (industrial, Rolleston, Selwyn) (*PC66*);
 - 5.2 Private Plan Change 69 (residential, Lincoln, Selwyn) (*PC69*);
 - 5.3 Private Plan Change 73 (residential, Rolleston, Selwyn) (*PC73*);
 - 5.4 Private Plan Change 80 (industrial, Rolleston, Selwyn) (*PC80*);
 - 5.5 Private Plan Change 81 (residential, Rolleston, Selwyn) (*PC81*);
 - 5.6 Private Plan Change 82 (residential, Rolleston, Selwyn) (*PC82*); and
 - 5.7 Private Plan Change 31 (residential, Ōhoka, Waimakariri) (*PC31*).

THE DRAFT SPATIAL PLAN

- 6 Carter Group support the general intent of the draft Spatial Plan, in particular:
- 6.1 The future planning of development to ensure integrated and well-functioning urban environments into the future;
 - 6.2 The identification of constraints to development, including areas to be protected and avoided;
 - 6.3 The identification and strengthening of the network of urban and town centres (except to the extent these are opposed below); and
 - 6.4 The continued use of greenfield development to provide capacity in appropriate locations.
- 7 Carter Group particularly supports the following opportunities the draft Spatial Plan identifies:
- 7.1 Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change.
 - 7.2 Enables diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs.
 - 7.3 Provide space for businesses and the economy to prosper in a low carbon future.
 - 7.4 Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.
- 8 Carter Group otherwise has some more specific feedback on aspects of the draft Spatial Plan below.

Constraints – areas to protect and avoid

- 9 One of Carter Group's key submission points is that it is imperative that the high-level direction to avoid constraints is appropriately translated into where growth is directed.
- 10 A clear example of where this has not occurred in the draft Spatial Plan is with respect to Map 7 and the areas subject to natural hazards risks. This map shows a significant extent of flooding (1:500 year, high hazard) in and around Kaiapoi.
- 11 The key directions in the draft Spatial Plan relating to reducing and managing natural hazards and climate change to provide resilience are as follows:
- 11.1 Focus and incentivise growth in areas free from significant risks from natural hazards; and
 - 11.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards.

- 12 Despite these clear directions and the fact that Kaiapoi has multiple areas to protect and avoid identified over it, Kaiapoi has been identified as a 'locally important urban centre/town' intended to support greater intensification of people, services, and employment. This is a real internal dichotomy in the draft Spatial Plan that must be considered further.
- 13 The draft Spatial Plan provides an excellent opportunity to encourage and discourage growth in certain areas. The thinking around where growth should occur and issues regarding natural hazards and climate change has changed substantially in recent years.
- 14 The draft Spatial Plan should not be restricted by previous iterations of the Spatial Plan (such as Our Space) showing where growth should occur where there is new, robust information to suggest a particular location is no longer appropriate. That is the exact reason why the Spatial Plan needs to be revisited on a regular basis to ensure it still aligns with what we know on the ground.

Demand and development capacity

- 15 Carter Group note the importance of knowing likely future demand and capacity for both residential and commercial land.
- 16 Carter Group considers it is imperative that these assessments are done in a robust and collaborative manner, with the supporting information made publicly available. Carter Group has in various planning processes across Greater Christchurch demonstrated that both demand and capacity has been significantly underestimated by Councils and the Greater Christchurch Partnership. The risk is that Councils are then not meeting their obligations under the National Policy Statement for Urban Development 2022.
- 17 To this end, Carter Group notes that Table 2 and Figure 9 of the draft Spatial Plan is unlikely to be accurate, particularly for the Waimakariri District given the recent work it has done in that District.

Green belt concept

- 18 Carter Group support the concept of green belts provided these are appropriately located and managed in an integrated way with development.
- 19 However, Carter Group holds some reservations with respect to these:
- 19.1 There is a significant lack of detail with respect to how these will be implemented – including for example, who these greenbelts would be owned and/or maintained by, and the ability for these areas to adapt to change in the future if required.
- 19.2 It is concerned about the proposed location of the greenbelts as shown in Map 2 of the draft Spatial Plan and that this effectively will 'lock in' the extent of the various urban areas into the future. Great care should be taken on any proposals which seek to pre-emptively limit the extent to which urban environments can grow.
- 19.3 Carter Group considers the green belt should align with land that is considered highly productive (LUC 1-3) under the National Policy Statement

for Highly Productive Land 2022 (*NPS-HPL*) and should not be located on land that is not highly productive.

- 19.4 It is understood that the green belt would provide a buffer between rural and urban areas. Careful thought will need to be put into how such areas are to be provided. For example, consideration of the appropriate zoning. While a rural zone on face value might seem appropriate, we note that much of the Canterbury rural zones are captured by the NPS-HPL. The NPS-HPL currently treats open space and sports and recreation activities as 'urban' activities which should be avoided in those areas, which may preclude these types of activities which are appropriate or desirable as part of a green belt.

Public transport

- 20 Carter Group consider the draft Spatial Plan should recognise that public transport is generally reactive to growth (rather than proactive) and that it is capable of being provided in an adaptive manner as circumstances within Greater Christchurch change, including changes in land use patterns or density and/or changes to transport technologies and public transport provision. Autonomous vehicles, micro-mobility, and ride sharing or on-demand public transport are all examples of rapidly evolving transport initiatives that the draft Spatial Plan should be sufficiently responsive to.

Comments with respect to particular maps

- 21 Carter Group generally support Map 2 of the draft Spatial Plan showing the spatial strategy, subject to the inclusion of other development areas as shown in **Appendix 1** to reflect recent plan change processes and the associated evidence base supporting urban growth in these locations.
- 22 Carter Group notes that in Maps 2 and 14 the area subject to PC80 is marked as an "approved plan change not made operative". PC80 was made operative on 1 June 2023 and should therefore be recognised as such in these maps. On this basis, Carter Group also consider PC80 should be shown in Map 13 as an extension of the IZone 'Industrial Type Employment' area.
- 23 Carter Group also notes that decisions on the proposed Selwyn District Plan are imminent, and whilst the outcome of decisions on the rezoning are not known at this point the draft Spatial Plan and its maps should account for land rezoned through that process.
- 24 Finally, Carter Group question the relevance or need for Map 4 generally, and specifically insofar that 'Priority Development Areas Arising from Technical Assessment' are spatially defined on the plan. The Spatial Plan as a whole generally describes the priority areas for Greater Christchurch and depicts these priority areas with greater clarity and broader context on Map 2. Conversely, Map 4 narrowly and inappropriately frames 'Priority Areas for Greater Christchurch', despite the text on page 43 of the draft Spatial Plan acknowledging these are only 'broad locations' and that 'further work is required to define the extent and description of some of these areas'. For these reasons, Carter Group consider Map 4 should be deleted.

CONCLUSION

- 25 Carter Group thanks the Greater Christchurch Partnership for this opportunity to submit on the draft Spatial Plan.
- 26 Carter Group wish to attend any hearing held on the draft Spatial Plan and is happy to provide any additional information should the GCP consider it necessary.

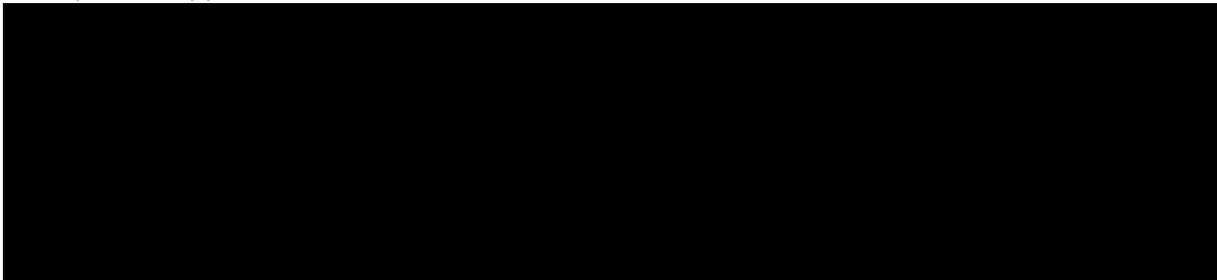
Dated: 23 July 2023



Jo Appleyard / Lucy Forrester
Counsel for Carter Group Limited

Address for service of submitter:

Carter Group Limited
c/- Jo Appleyard / Lucy Forrester
Chapman Tripp



APPENDIX 1 – ADDITIONAL AREAS FOR MAP 2 AND 14



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Annabelle **Last name:** Lee

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Lyttelton Port Company Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
LPC submission on draft Spatial Plan

23 July 2023

To the Greater Christchurch Partnership

Lyttelton Port Company Limited Submission on draft Greater Christchurch Spatial Plan

Introduction

- 1 Lyttelton Port Company Limited (*LPC*) thanks the Greater Christchurch Partnership for the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (the *draft Spatial Plan*).
- 2 *LPC* is a wholly owned subsidiary of Christchurch City Holdings Limited (*CCHL*), which is the investment arm of Christchurch City Council (*CCC*). Within the Greater Christchurch area, *LPC* operates three key sites:
 - 2.1 Lyttelton Port (the *Port*) is the South Island's major deep-water port and is the international freight gateway for the South Island; and
 - 2.2 Two inland ports (the *Inland Ports*) - CityDepot in Woolston and Midland Port in Rolleston.
- 3 Collectively, *LPC*'s strategic infrastructure assets contribute significantly to the social and economic success of Greater Christchurch, primarily through the distribution of goods within and beyond the Canterbury region.
- 4 The draft Spatial Plan, as the high-level strategic growth strategy for Greater Christchurch, is a critical planning document for *LPC*. *LPC* understands that it will inform planning instruments under the Resource Management Act 1991, including the Canterbury Regional Policy Statement (*CRPS*) and the three district plans. These documents directly influence *LPC*'s day-to-day operations and planning for the future.
- 5 *LPC* is generally supportive of the draft Spatial Plan as notified, as its purpose aligns with *LPC*'s vision to plan strategically and to anticipate future growth needs. *LPC* also agrees that alignment across the territorial authorities in Greater Christchurch will be crucial to ensure urban growth, and the infrastructure required to support it, is co-ordinated and well-delivered.
- 6 However, *LPC* considers that there are some aspects of the draft Spatial Plan that could be improved, particularly given that it will guide the upcoming *CRPS* review. In summary, *LPC*'s submission on the draft Spatial Plan seeks:
 - 6.1 Appropriate identification of *LPC* and the activities that it carries out in Greater Christchurch. The Port, the Inland Ports and the associated freight network, as strategic infrastructure, are more than a "Key Business Area";
 - 6.2 Stronger protection of existing strategic infrastructure assets, to ensure the safe and efficient operation of *LPC*'s activities;
 - 6.3 Provision for development, maintenance and upgrades to strategic infrastructure as the Greater Christchurch population grows; and

- 6.4 Stronger links between decarbonisation and what it means for strategic infrastructure planning out to 2050.
- 7 More detail on the amendments LPC seeks to the draft Spatial Plan are set out in **Appendix 1**.
- 8 LPC requests the opportunity to be heard to present its submission.

Background – Lyttelton Port Company Limited

- 9 LPC directly employs over 600 people and, beyond that, supports thousands of jobs and the creation of billions of dollars of wealth for the Canterbury economy.
- 10 LPC is committed to continuing to provide these social and economic benefits while also doing its part in addressing the significant global challenges of climate change and biodiversity loss. LPC's sustainability strategy has three key focus areas: prosperity, people and the planet.
- 11 LPC has partnered with the Banks Peninsula Conservation Trust to restore the Lyttelton Port Saddle, a 17-hectare area owned by LPC above the eastern edge of Lyttelton township. LPC has also partnered with several other organisations on Whaka-Ora Healthy Harbour, restoring and protecting the health of Whakaraupō/Lyttelton Harbour.

The Port

- 12 LPC's landholding at the Port covers a total of some 163 hectares, extending from Magazine Bay in the west to Gollans Bay in the east. The container terminal is operated from Cashin Quay which is situated at the eastern edge of the Lyttelton Township adjacent to Te Awaparahi Bay. The Port operates continuously, 24 hours a day and seven days per week.
- 13 The Port is by far the most significant port in the South Island in terms of total tonnage of cargo, number of containers handled and the value of both exports and imports. It is New Zealand's third-largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 14 By volume, the Port accounts for 34.4% of South Island seaports' overseas exports and 37.4% of overseas imports. By value, the Port handles 41.4% of the South Island's seaports' exports and 67.9% of the South Island's seaports' imports.¹ It is recognised as a "lifeline utility"² and "significant infrastructure"³ at the local and national level.
- 15 Trade through the Port has grown considerably across both containerised and general cargo. In the last financial year (ending 30 June 2022) the Port handled 500,000 Twenty-foot Equivalent Units (*TEU*), an increase of 13.6% on the previous year and 71% higher than the volume in 2011. This is equivalent to an average annual growth rate of over 5%.

¹ For the year ending 30 June 2020. Source: Statistics New Zealand Infoshare, Overseas Cargo Statistics.

² Schedule 1 of the Civil Defence Emergency Management Act 2002.

³ New Zealand Government's 2011 National Infrastructure Plan and Christchurch City Council's Christchurch Transport Plan 2012-42.

- 16 LPC forecasts ongoing growth for its container terminal to reach well over one million TEUs by 2045. Non-containerised volumes of export and import traders are expected to continue growing but not as fast as containerised cargo.
- 17 As this growth is expected to continue, LPC has completed a two-year \$85 million Eastern Development project, expanded the Port's footprint, introduced modern infrastructure, increased yard space and enhanced our operational efficiency. Key features include:
- 17.1 Over five hectares of pavement have been added to the 20-hectare container facility, paving the way for future growth.
 - 17.2 Expanding the refrigerated container (reefer) capacity and constructing new reefer towers has effectively doubled the Port's refrigerated container capacity.
 - 17.3 \$20 million state-of-the-art mechanical workshop that has improved staff working conditions, reinforcing the Port's commitment to its employees.
 - 17.4 New layout of Receipt and Dispatch truck lanes, where trucks pick up and deliver containers.
- 18 The next phase of the Te Awaparahi Bay Terminal and the Port's proposed move to the east is expected to cost approximately \$500,000,000 (or more). This will involve a further 18-hectare land reclamation, construction of a 750-metre-long wharf and development of the land into a new container terminal.
- 19 This is the largest redevelopment in the Port's history, with a major focus being to move a significant part of operations east to allow for growth. The redevelopment is enabled by the Lyttelton Port Recovery Plan, a significant document in the recovery of Greater Christchurch post the earthquakes.
- 20 The redevelopment will ensure that forecasted freight increases are able to be catered for, and that the Port can continue to support customers' requirements and growth within Greater Christchurch and beyond.
- 21 Looking to the future, the redevelopment will also ensure that the Port is fit-for-purpose in a low carbon shipping future, aspects of which we are beginning to see worldwide and in New Zealand. This includes:
- 21.1 Redeveloping the existing fuel storage areas at the Tank Farm with a view to accommodating cleaner fuels, such as ammonia, methanol and hydrogen, to drive shipping's decarbonisation;
 - 21.2 Replacement of the coal handling and storage area with warehousing at the time when coal exports eventually cease; and
 - 21.3 Redeveloping the existing marina, ferries and public transport areas and providing opportunities for electrification.

The Inland Ports

- 22 CityDepot at Chapmans Road, Woolston:
- 22.1 Has a direct connection with the container terminal at the Port;

- 22.2 Is the closest container depot site to the Port and has the benefit of an existing rail siding; and
- 22.3 Operates 24 hours a day for five and a half days a week and has good access to the State Highway network and to the rail network via the 24-wagon rail siding.
- 23 Midland Port at Jones Road, Rolleston:
- 23.1 Provides for the receipt, storage, packing, and unloading of import and export containers, on site reefer services (plugs and monitoring), and includes direct rail connections serving 11 shipping lines and eight shipping services that access the Port;
- 23.2 Is a Ministry of Agriculture and Forestry certified transitional facility and customs-controlled area; and
- 23.3 Operates 24 hours a day, seven days a week and has good access to the State Highway network and to the rail network.
- 24 The Inland Ports are an integral and integrated component of the Port's infrastructure and they cannot be distinguished in a functional or operational sense from the remainder of Port activities.
- 25 The Inland Ports help to mitigate operational constraints at the Port because of ship-side land limitations. These operational constraints will be exacerbated in the future as a result of:
- 25.1 Expected future growth in container volumes through the Port; and
- 25.2 The overall Port redevelopment project, as outlined above.
- The wider freight network***
- 26 The Port and Inland Ports are a critical component of the freight network for Greater Christchurch and other South Island, New Zealand and overseas locations.
- 27 Due to the topographical barrier of the Port Hills for road and rail access to the Port, the existing connections that link the Port to the wider freight network, and the connections to and between the Inland Ports, are of critical importance. Directly out of the Port, these include:
- 27.1 State Highway 74 through the Lyttelton Tunnel;
- 27.2 Sumner Road/Evans Pass Road;
- 27.3 Dyers Pass Road;
- 27.4 Gebbies Pass; and
- 27.5 The rail spur connecting to the Main South Line through a dedicated rail tunnel through the Port Hills.
- 28 Beyond this, the wider road and rail network are also of critical importance for freight movements, including the Brougham Street corridor and other locations.

The Draft Spatial Plan – recognition and protection of LPC’s operations and future outlook

29 With the above background of the Port, the Inland Ports and the wider freight network now and into the future in mind, LPC makes the following comments in respect of the draft Spatial Plan.

Defining, recognising and future-proofing strategic infrastructure

30 LPC considers that the overarching Spatial Plan framework must appropriately recognise the critical contribution of strategic infrastructure to the social and economic prosperity of Greater Christchurch.

31 LPC supports the draft Spatial Plan insofar as it provides the foundations for an appropriate framework. However, LPC considers that the draft Spatial Plan could be strengthened in order to elevate the protection of existing strategic infrastructure, and to provide for maintenance and upgrades which will be necessary to sustain the anticipated urban growth in Greater Christchurch.

32 Furthermore, with the increasing focus on decarbonisation and resilience to the effects of climate change, what constitutes and supports strategic infrastructure in the future is likely to be different to what exists today. The draft Spatial Plan needs to be sufficiently adaptive and responsive to future infrastructure needs.

33 LPC generally supports reference in the draft Spatial Plan to the Port as important strategic infrastructure which is required to be protected. The Inland Ports are also recognised in some places. However, this is not the case in all relevant maps and accompanying text. As outlined at **Appendix 1**, LPC considers that amendments are required to the draft Spatial Plan maps and supporting text to ensure that this recognition is consistent and that it is strengthened.

34 In addition, the “port infrastructure” extends beyond simply the Port and Inland Ports and encompasses (at a minimum) freight corridors, electrical infrastructure, the gas pipeline from the Port to Woolston, navigational infrastructure, and other services to and from, including buses and ferries. The broader concept of “port infrastructure” requires recognition in the draft Spatial Plan.

35 The CRPS currently identifies both the Port (including associated facilities) and the ‘Significant Regional Transport Hub’ as *strategic* and *regionally significant infrastructure*. The CRPS seeks to ensure that development does not adversely affect the efficient operation, use, development and future planning of strategic infrastructure and freight hubs⁴ and seeks to only provide for new development that does not affect both the use and development of strategic infrastructure.⁵

36 Given the draft Spatial Plan will guide the review of the CRPS, LPC considers it important that the draft Spatial Plan set the scene for continuing these themes of protection and enablement of significant infrastructure.

37 Ultimately, LPC considers that strategic infrastructure, such as the Port and the Inland Ports, is more than a “Key Business Area” as currently denoted in the draft Spatial Plan. It is different from other areas which provide industrial activity,

⁴ Objective 6.2.1(10)

⁵ Policy 6.3.5.

employment and freight in isolation, but that do not contribute an overarching strategic infrastructure function.

- 38 In recognition of this distinction, LPC seeks that the Port and Inland Ports are elevated from simply being considered a “Key Business Area”, along with other strategic infrastructure such as Christchurch International Airport.

Identification of port facilities

- 39 The significance of strategic infrastructure, such as the Port and Inland Ports, and the need to protect it from incompatible land use and reverse sensitivity effects must be signalled at the top end of the planning hierarchy. LPC understands that the draft Spatial Plan is intended to undertake this role in the framework.

- 40 It is therefore important that all of LPC’s strategic infrastructure assets are consistently referred to and identified. As explained above, they all play a critical role in an integrated network and cannot be functionally or operationally separated for the purposes of the draft Spatial Plan.

- 41 The map at **Appendix 2** outlines all land at the Port and the Inland Ports which LPC considers should be recognised, at a high level, in the draft Spatial Plan. All areas contain infrastructure that is critical to LPC’s operations.

- 42 Recognition of LPC’s strategic infrastructure in the draft Spatial Plan should also be future-looking and encompass likely development and operations out to 2050.

Identification of the freight network

- 43 LPC’s position is that the draft Spatial Plan should clearly recognise the significant infrastructure and transport networks that support the Greater Christchurch area, including the Port and the Inland Ports, as well as the freight connections between them.

- 44 The map at **Appendix 3** highlights key road and rail freight routes that connect to LPC’s hubs. LPC considers that these routes are significant and should be identified in an appropriate location in the draft Spatial Plan.

- 45 Importantly this map identifies primary freight routes that are used day-to-day, but also alternative routes which are used in circumstances where the primary routes are not suitable and/or available for use.

- 46 These alternative routes are critical to the resilience of the integrated freight network. Without them, if one of the primary freight routes is compromised then the entire network breaks down. LPC therefore considers that both the primary and alternative routes, must be identified and protected in the draft Spatial Plan.

- 47 The draft Spatial Plan should also consider the future of the freight network as volumes grow to cater for the growth of the region and country. For example, this may need to include:

47.1 Embedding Norwich Quay as a State Highway servicing the Port;

47.2 Resilience and upgrade works to Evans Pass and the route to Sumner, and the route out to Governors Bay via Gebbies Pass;

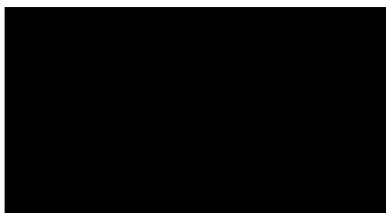
47.3 Access along State Highway 74 to North Canterbury;

- 47.4 Upgrades along the State Highway 76 route, specifically the Brougham Street section;
- 47.5 In the medium to long-term, another solution for the Lyttelton Tunnel; and
- 47.6 In respect of rail at Midland Port, maintaining the ability for trains to turn onto to the northern line when leaving Midland Port, ensuring trains can continue to move efficiently along the double tracked line between Islington and Rolleston, and that any proposed roading overpass at Rolleston does not affect access to and from Midland Port.

Conclusion

- 48 LPC's strategic infrastructure assets principally facilitate the distribution of goods into, out of and within the Canterbury region and this contributes significantly to the social and economic success of Greater Christchurch.
- 49 LPC supports the draft Spatial Plan, but generally seeks stronger protection and provision for strategic infrastructure which will be critical to accommodate projected urban growth. This includes assets that exist today but also those that will be required in the future, consistent with the draft Spatial Plan's outlook to 2050. LPC's specific comments on the draft Spatial Plan are outlined at Appendix 1 below.

Yours faithfully



Phil de Joux

Chief Corporate Affairs Officer

APPENDIX 1

The following table outlines LPC's position on various parts of the draft Spatial Plan. Further or consequential changes to these or other parts of the draft Spatial Plan may be required in order to give effect to the matters raised in LPC's submission:

Spatial Plan reference	LPC comment
General	
Key terms (pages 10 and 11)	LPC observes that the list of key terms at the beginning of the draft Spatial Plan is not exhaustive. For example, "infrastructure", "renewable energy", "freight network" and other relevant terms used in the draft Spatial Plan are not included. LPC considers that the list of key terms should be more comprehensive, specifically in accordance with the matters outlined in its submission.
Introduction (page 13) and aspirations (page 14)	LPC supports the introductory text and figures, and the intent to indicate a clear pathway for how Greater Christchurch will grow. However, for reasons outlined above, LPC considers that specific reference to infrastructure is appropriate and necessary upfront in the draft Spatial Plan. Efficient and reliable infrastructure will be essential for Greater Christchurch to support future growth and it is important to recognise that the two run hand-in-hand.
Context (page 19)	LPC supports the final paragraph on page 19 which refers to the Port and the Inland Ports as a nationally important economic asset.
Interplay between Objectives and Directions	LPC observes that some sections of the draft Spatial Plan will conflict in certain contexts. For example, the Port is located in and is functionally dependent on the coastal environment. There is unavoidable interaction between the needs of Port infrastructure and the broader management of environmental or cultural values associated with the coastal environment. LPC continues to fulfil its environmental obligations and continues to work with the tangata whenua on various issues, but the bottom line is that the Port is a highly modified part of

	<p>the coastal environment. Likewise, LPC would be concerned if external decisions were made on how best to manage natural hazards both at the Port and the Inland Ports. LPC is well cognisant of these issues.</p> <p>At present, the draft Spatial Plan does not appear to contemplate these interactions. LPC suggests that one solution is to add a new section with text addressing the interaction between the various Opportunities and Directions.</p>
Maps	
General	<p>As a general comment, LPC seeks that the draft Spatial Plan maps and legends consistently identify all three of LPC's sites. The Port and the Inland Ports are all critical to the integrated freight network in Greater Christchurch and cannot be distinguished in a functional or operational sense.</p> <p>Furthermore, it is important that the maps are displayed at the correct scale to ensure LPC's assets are clearly visible to readers of the draft Spatial Plan.</p>
<u>Map 2:</u> The Greater Christchurch spatial strategy (1 million people) (page 29)	<p>LPC considers that Map 2, which provides a visual representation of the Opportunities, Directions and Key Moves that make up the spatial strategy for Greater Christchurch, should identify strategic infrastructure activities such as those at the Port and the Inland Ports. As noted in the context section, these assets are nationally important and enable the social and economic prosperity of Greater Christchurch. The effective and efficient operation of infrastructure will be critical for serving projected growth to 1 million people and accordingly it is appropriate that they are identified on Map 2.</p> <p>LPC supports identification of the heavy rail line on Map 2 but considers other freight and public transport routes should also be included consistent with its submission.</p>
<u>Map 5:</u> Areas to protect and avoid (page 52)	<p>LPC supports the identification of areas to protect and avoid, including in relation to strategic infrastructure. However, it is concerned that Map 5 does not clearly articulate the Port, the Inland Ports nor the major freight routes. LPC suggests that different colours could be used to differentiate the types of areas to protect and avoid. The legend should also be amended accordingly, including the explicit identification of LPC's assets and major freight routes.</p>

<u>Maps 6, 8 and 10</u>	LPC considers that the draft Spatial Plan needs to address the interplay between environmental and cultural values that will require specific management and strategic infrastructure assets (which are to be provided for) that have a functional or operational need to locate in certain areas. Maps 6, 8 and 10 are areas which need specific management, but it will be important to acknowledge that strategic infrastructure may need to operate and develop in those locations. It would be preferable if the Port and Inland Port were carved out from these maps.
<u>Maps 9, 14 and 15</u>	The maps must identify the Port and the Inland Ports Operations and Influence Overlays. Furthermore, LPC considers that other major freight network routes should also be included for reasons outlined in its submission.
<u>Map 13: key employment areas and economic assets</u>	Map 13 broadly identifies the Port and the Inland Ports, which is supported by LPC. However, it is noted that only Izone and Lyttelton are specifically signalled. LPC requests that CityDepot is also added to the list of key employment areas within the Central City limb.
<i>Opportunities</i>	
General - Opportunities, Directions and Key Moves (pages 30-31)	<p>It is important that the draft Spatial Plan appropriately recognises the balance between urban growth and the infrastructure necessary to support it, particularly with anticipated growth to 1 million people in Greater Christchurch in the future.</p> <p>LPC generally supports the identification of key Opportunities and their associated Directions and Key Moves. As currently drafted, there are Directions which provide for infrastructure, but these do not sit neatly within the existing Opportunities. LPC considers there should be an additional Opportunity specifically relating to the enablement and protection of infrastructure. It is vital that strategic infrastructure, specifically Port activities and the freight network, is efficient and resilient. This approach provides greater clarity and certainty, and appropriately elevates the recognition of infrastructure to ensure it is provided for at a high level in the draft Spatial Plan.</p> <p>If the Greater Christchurch Partnership prefers to retain six Opportunities, LPC seeks amendments outlined below.</p>

	LPC also considers it should be made plain that there is no hierarchy between Objectives.
<u>Opportunity 3</u>	<p>As outlined above, LPC is concerned that the draft Spatial Plan does not address the interface between the provision of infrastructure and the management of other environmental values.</p> <p>The Port is a well-established asset and is identified, as noted earlier, as a highly modified area of the coastal environment. It is important that this is acknowledged in the sections of the draft Spatial Plan.</p>
<u>Opportunity 4</u>	LPC agrees that this is an important Opportunity and, in particular, supports reference to the delivery of “community infrastructure”. However other types of infrastructure, such as LPC’s strategic assets and the supporting freight network, will also be crucial to deliver quality living environments. LPC therefore considers that the Directions should be expanded to recognise broader infrastructure needs.
<u>Opportunity 5</u>	<p>LPC generally supports Opportunity 5, including Direction 5.3 in relation to strategic and efficient infrastructure. However, this must refer to “enablement” as well as “protection” for reasons outlined in LPC’s submission. For example, development, maintenance and upgrades to the integrated rail and land transport networks will be required in the future and it is important that this is recognised in the draft Spatial Plan.</p> <p>In addition, LPC considers that a greater degree of focus should be given to the transportation of goods (i.e. the freight network), which is equally important to society and the economy.</p>
<u>Opportunity 6</u>	LPC generally supports Opportunity 6, specifically Direction 6.5 in relation to the connected freight network. Again, LPC considers that this must also refer to “enablement” and “improvement” to ensure the draft Spatial Plan contemplates future maintenance and upgrades which will be required to ensure the freight network is efficient, reliable and resilient and is designed to support reductions in transport emissions.
“Key business areas”	The Port of Lyttelton is identified as a “key business area” in the proposed network of urban and town centres. LPC is concerned, in the first instance, that the list omits the Inland Ports which cannot be functionally or operationally separated from activities at the Port. Furthermore, LPC considers that its activities do not sit comfortably in this category. The Port and the Inland Ports are strategic infrastructure with national economic and social importance and LPC is concerned that notation as a “key business area” undersells this importance.

	LPC seeks a new type of “centre” for strategic infrastructure where the purpose would reflect the nature of those activities as explained in LPC’s submission.
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APPENDIX 2 – LPC LAND AT THE PORT AND THE INLAND PORTS

The Port of Lyttleton



CityDepot



Midland Port



APPENDIX 3 - KEY ROAD AND RAIL FREIGHT ROUTES THAT CONNECT TO LPC'S HUBS



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Jos **Last name:** Unterschuetz

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Jos Unterschuetz - Greater Christchurch Spatial Plan - Submission Paper A4V4



**Whakawhanake
Kāinga Komiti**

Urban Growth Partnership
for Greater Christchurch



Huihui Mai
Let's come together

Draft Greater Christchurch Spatial Plan Submission form



Over the past 15 years, Christchurch and its surrounding towns have grown rapidly. By 2050, more than 700,000 people are projected to be living in Greater Christchurch – 30% more than there are today. The population could potentially double to 1 million people within the next 60 years, if not earlier.

Collective effort is required to increase resilience to natural hazards and climate change, improve access to employment, education and housing, reduce carbon emissions, and create a sustainable and prosperous future.

In our recent Huihui Mai engagement we asked residents how they thought we should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability.

Of the more than 7,000 people who responded to the online survey:

86%

agreed with the direction to focus growth around key urban and town centres and along public transport routes

56%

of people are open to higher density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people.

68%

Identified improving the health of waterways as a top priority

53%

of people agree with the proposed MRT route and 24% disagree. Agreement is much higher in suburbs along the MRT route (72%).

This information has informed the draft Greater Christchurch Spatial Plan, which is open for public submissions until **23 July 2023**. Even if you were not part of the earlier Huihui Mai engagement – your feedback on the draft plan is still important. We want to know if we got it right.

Making a submission

Fill out the online submission form
or send us an email

www.greaterchristchurch.org.nz
huihuimai@greaterchristchurch.org.nz

Deliver* this form to:

Christchurch City Council Te Hononga Civic Offices, 53 Hereford Street, Christchurch
Selwyn District Council Offices, 2 Norman Kirk Drive, Rolleston
Waimakariri District Council Offices, 215 High Street, Rangiora
Environment Canterbury, 200 Tuam Street, Christchurch

Post* this form to:

Greater Christchurch Spatial Plan Consultation, Greater Christchurch Partnership, PO Box 73014, Christchurch 8154

*Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearing panel

If you make a submission, you can also speak to the Hearings Panel in support of your submission. Hearings on the draft Greater Christchurch Spatial Plan are scheduled to be held in October 2023.

Please note : We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However if requested, we will make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email huihuimai@greaterchristchurch.org.nz.

Webinar

We're holding a webinar on Tuesday 27 June between 12 - 1pm to talk about the plan and to answer any questions you might have. You can register for the webinar online at www.greaterchristchurch.org.nz

Once you register for the webinar you will have the opportunity to send in your questions either before, or during, and we will answer as many as we can. The webinars will be recorded and uploaded to this page so you can watch at another time if you are unable to attend.

Contact the team

If you'd like us to attend your community meeting or event. If you have any questions for the team please email us: huihuimai@greaterchristchurch.org.nz

Next steps

Late July - September Submissions are collated and a report is produced for the Hearings Panel

October & November Hearings and Deliberations

Whakawhanake Kāinga Komiti considers endorsement and recommendation to partners of the Hearings Panel Recommendations Report

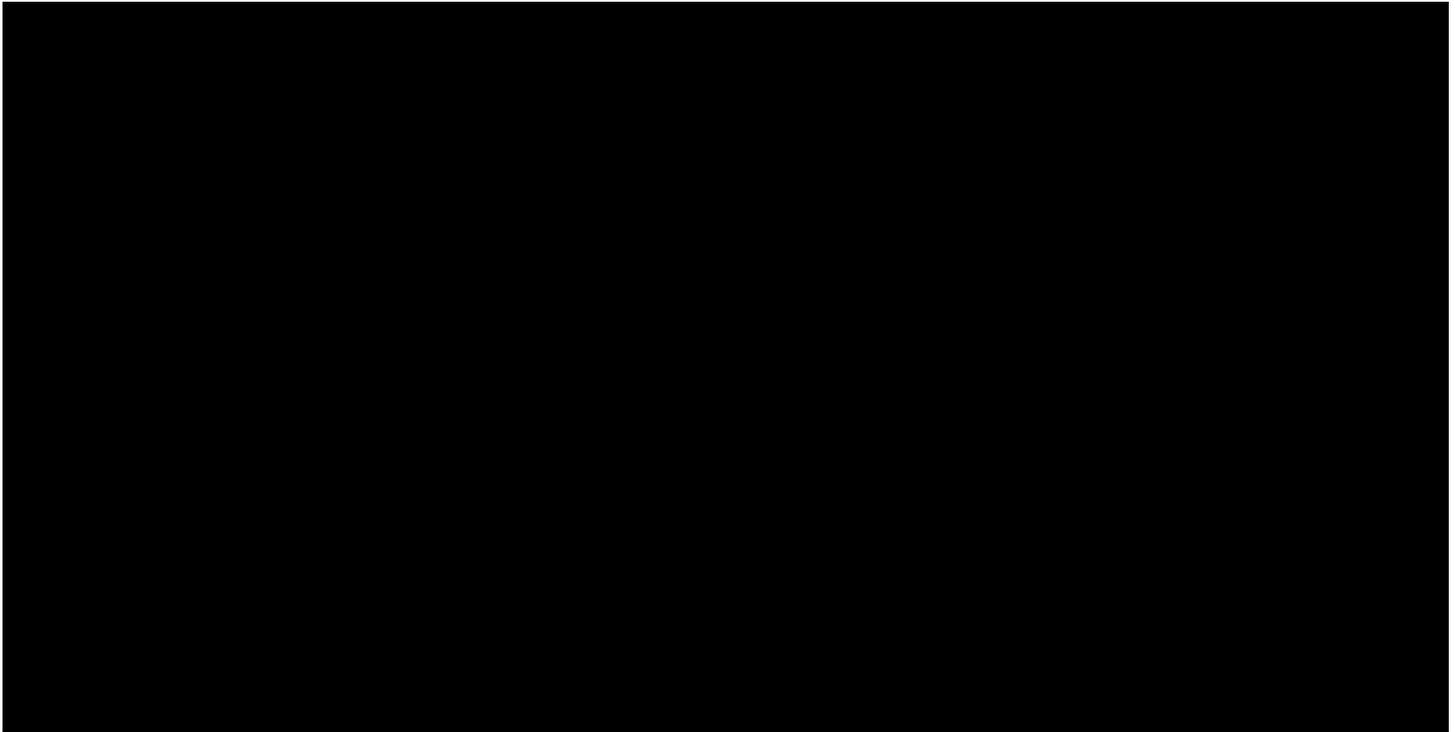
Early 2023 Partners consider adoption of the Greater Christchurch Spatial Plan



Your details

First name Jos

Last name Unterschuetz



If you're responding on behalf of an organisation, please provide

Organisation name

Your role

Number of people your organisation represents

Would you like to speak to the Hearings Panel about your submission? Your submission will be fully considered, regardless of whether you speak to the Panel.

Yes No

If yes, please ensure you have provided a daytime phone number in the details section so we can arrange a speaking time with you.



Questions

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The Greater Christchurch spatial strategy (1 million people)





Q1 The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions. Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes No Unsure

Why?

The public transport system proposed in the draft Spatial Plan is a step in the right direction BUT it does not go far enough for three reasons:

(1) It falls short of explicitly proposing a commuter rail system. I do NOT support buses or Autonomous Rapid Transit (ART).

Buses simply are not fast enough. Ideally someone commuting from Rolleston or Rangiora should be able to make it to Christchurch CBD within a half hour of catching their service.

While "Wi-Fi-friendly" is mentioned, to take full advantage of the wi-fi, office workers need public transport to be a place where you can work, especially if the commute will be long. If you are going to sit there for an hour, you need a stable journey that does not induce motion sickness. Commuter rail gives you that.

Paved routes can easily be converted to normal roadway with a change of government, thus making public rapid mass transit a precarious target between election cycles. Commuter rail ensures a legacy.

(2) The plan pays lip service to possibly extending the "Turn up and go service" to Kaiapoi and Rolleston, with no explicit date for when this might happen given. We need an explicit plan for connecting our satellites.

(3) The extension of the service would need to go further than Kaiapoi, ultimately to Rangiora, so as to connect all the satellites into the network.

Q2 Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing. Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes No Unsure

Why?

In principal, I agree that urban development should be concentrated around urban centres and along transportation corridors, especially public mass transit corridors where it would be relatively easy for families living in dense affordable apartment housing are able to catch commuter rail to work, university, or school with no need to take a car.

However, Map 1 - Draft Greater Christchurch Spatial Plan, clearly depicts green belts cutting off growth of housing between Hornby, Prebbleton, Lincoln, and Rolleston along said public mass transit corridors, which is not in line with the proposed focus of concentrating development and investment around transport corridors.

Q3a The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes No Unsure

Why?

I am supportive of the concept of a blue-green network, but the Christchurch Spatial Plan is incredibly light on details as to what that will actually look like. The plan seems to connect the concept of a blue-green network to the greenbelts, which would exist between settlements, whereas in my mind a well planned blue-green network would connect city and town centres, with parks, and bicycle trails so as to encourage people to use bicycle trails either for recreation or commuting.

What constitutes a bicycle trail itself is something we need to define, as a roadway only wide enough for car with a bicycle symbol spray painted onto the road is not a bicycle trail but a hazard for cyclists. Bicycle trails at a minimum should exist in a separate lane from car and pedestrian traffic, but at their best are narrow parks, with trees flanking either side. This later vision of a system of narrow parks with trees flanking either side connecting larger parks and town centres is what I envision when I hear the term "blue-green network" and this is what I support.



Q3b One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation. Do you support the concept of a Greenbelt around our urban areas?

Yes No Unsure

Why?

I do not support the proposed use of green belts in the plan, which will only serve to decrease the affordability of Greater Christchurch and threaten to Christchurch's position as New Zealand's most affordable city, and in so doing cut off one of the most significant economic advantages Christchurch has over Auckland and Wellington. I hope to see this city continue to grow and thrive for decades to come.

Instead of green belts, what we need is more green spaces, parks, and reserves built within new developments and city limits. I live in Rolleston, and our biggest reserve is Foster Park, which is inadequately small for the growth the area has and will continue to experience, and especially when compared to the size of parks that can be found in neighboring Christchurch and Ashburton.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- a Offer opportunities for accelerated and/or significant development
- b Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- c Are in key locations where successful development gives effect to the draft Spatial Plan.

Q4 The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes ~~No~~ Partially

Why (please specify the Priority Area)

I am supportive of Rangiora Town Center and Rolleston Town Centre being featured in the Priority Development Areas.

I would propose that Lincoln, Prebbleton, Kaiapoi, and Woodend significant secondary development areas that will grow as Rangiora and Rolleston grow, especially when linked with public mass transit corridors.



The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

Opportunities Ngā Ahinga	#1 Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people's physical and spiritual connection to these places	#2 Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change	#3 Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people	#4 Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs	#5 Provide space for businesses and the economy to prosper in a low carbon future	#6 Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities					
Directions Ngā Ahinga	Enable the prosperous development of kāinga nohoanga on Māori Land and within urban areas Focus growth through targeted intensification in urban and town centres and along public transport corridors										
Key Moves Ngā Kāhanga Mārama	<p>1.1 Avoid urban development over Wāhi Tapu</p> <p>1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai</p>	<p>2.1 Focus and incentivise growth in areas free from significant risks from natural hazards</p> <p>2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards</p>	<p>3.1 Avoid development in areas with significant natural values</p> <p>3.2 Prioritise the health and wellbeing of water bodies</p> <p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services, along with the development of kāinga nohoanga within urban areas</p> <p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p> <p>4.3 Focus, and incentivise, intensification of housing in areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network</p> <p>5.2 A well connected centres network that strengthens Greater Christchurch economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services</p> <p>5.3 Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy</p>	<p>6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility</p> <p>6.2 Significantly improve public transport connections between key centres</p> <p>6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga</p> <p>6.4 Develop innovative measures to encourage people to change their travel behaviours</p> <p>6.5 Maintain and protect connected freight network</p>	The prosperous development of kāinga nohoanga	A strengthened network of urban and town centres	A mass rapid transit system	A collective focus on unlocking the potential of Priority Areas	An enhanced and expanded blue-green network

Q5 Do you agree with the draft spatial strategy outlined above?

Yes No Partially Unsure

It would be helpful to understand which aspects you support or do not support and why:

I just have not heard the magic words "commuter rail" or "train" or "light rail" and so I cannot lend the plan my full support.

In order for Christchurch to accommodate 700 thousand to 1 million people, we need plan and build the infrastructure we will need for that size of a city now. The Wellington metropolitan area has 422 thousand people, and it already has rail lines. The city of Seattle, USA has 733 thousand people and it has a rail line connecting the north of the city with the south and the airport.

And that infrastructure in my mind is commuter rail line(s) that connects Rolleston, Central Christchurch, Rangiora, and Christchurch Airport.

Q6 Do you have any feedback on other aspects of the draft Spatial Plan?

One other point of feedback, from Rolleston to the Christchurch City Centre we have a double lane highway, which was needed and I am very happy about.

Christchurch needs a double lane highway from the City Centre to Kaipoi, Woodend, and Rangiora. This is not part of the current plan but should be.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Waimakariri Youth Council **Last name:** Waimakariri Youth Council

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
July WYC GCP Submission

1. Do you support the improved public transport system proposed in the draft Spatial Plan?

Needs a stronger connection to outer areas of Central Christchurch - stronger transport links to Kaiapoi/Rangiora and Rolleston. These links need to be more direct to places of interest. Direct links to universities, city locations, Rangiora to Rolleston, airport, without requiring multiple transfers and extra time.

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

Yes - although in the context of potential expansion, more consideration of outer areas in Waimakariri is important. Considering the transport networks to areas such as Woodend, Pegasus/Ravenswood, Oxford etc.

Concerned about the implication on community demographics - want intergenerational communities and intensified housing options/apartments likely not suitable for older generations.

3. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes.

4. Do you support the concept of a Greenbelt around our urban areas?

Yes.

5. Do you agree with the approach to focus on these areas?

Yes.

6. Do you agree with the draft spatial strategy outlined above?

Needs to include the word accessible in Opportunity #6. This is important to specify. Two different meanings for WYC - accessible bus stop locations, regularity and timing of buses, and accessible for people with a disability.

7. Do you have any feedback on other aspects of the Draft Spatial Plan?

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Sam **Last name:** Elder

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Orion Group Limited

Your role in the organisation and the number of people your organisation represents:

GM Energy Futures

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
ORION GROUP FINAL Submission - Greater Chch Spatial Plan



22 July 2023

Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

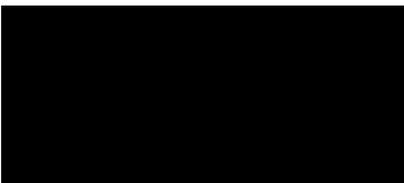
Dear Whakawhanake Kāinga Komiti

Greater Christchurch Spatial Plan

1. Thank you for this opportunity to make a submission on the draft Greater Christchurch Spatial Plan (Spatial Plan).

Background

2. As you will be aware, we own and operate the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 220,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB). Orion and its various predecessors have been providing this essential service to the region for close to 120 years.
3. Orion is a Lifeline Utility for the purposes of the Civil Defence Emergency Management Act 2002. Orion has a statutory duty under this legislation to ensure it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.
4. Orion has a fully owned subsidiary, industry service provider Connetics, and together with Orion the two organisations make up the Orion Group.
5. Central Canterbury is a place of rapid growth and transformation, embracing change and innovation,



with Ōtautahi Christchurch at the heart of this diverse and vibrant region. Electricity distribution has always been an essential service that underpins regional, community and economic wellbeing. Our service is vital to the wellbeing and livelihood of the people and businesses who live and operate here. Now, it also has a critical part to play in New Zealand's transition to a low carbon economy.

6. In this context Orion's Group Purpose of "Powering a cleaner and brighter future with our community" is central to all we do. As Aotearoa New Zealand transitions to a low carbon economy, the energy sector has a critical part to play primarily through electrification. Orion has established its purpose to be a vital player in that transition for our community and our region. We are focused on helping our community realise its dreams for a future that is new, better, and more sustainable over the long term.¹

7. We are very conscious that we face a rapidly changing and massively different energy environment in the decades ahead. The changing landscape facing Orion is primarily driven by three factors – climate change, new technology and increasing demand for electricity. The increasing demand for electricity is driven by the need to both enable decarbonisation at pace, and support population growth.

8. As the draft Spatial Plan points out, the latest projections from Stats NZ indicate Greater Christchurch's population will grow from a population of approximately 530,000 to more than 700,000 by 2051. This is around 170,000 more people and 77,000 more households. Although this population growth could occur sooner if Greater Christchurch grows at the rate seen over the last 15 years. It could reach a population of 700,000 within the next 25 to 30 years and one million within the next 60 years, doubling the size of today's population.

9. This Spatial Plan will satisfy the requirements of a future development strategy under the National Policy Statement on Urban Development (NPS UD). Importantly, the NPS UD directs that local authority decisions on urban development are to be integrated with **infrastructure planning decisions**, and that planning decisions contribute to well-functioning urban environments.² A well-functioning urban

¹ A recent report by the Boston Consulting Group highlights the role the electricity industry can play in reducing New Zealand's carbon emissions. The increase in electrification of transport and heating will allow New Zealand to make considerable movement towards the decarbonisation goals that have been set. In order to support this, New Zealand will need electricity networks to be expanded, more distributed and able to meet the changing needs of consumers. In essence, distribution will need to be widespread, flexible and reliable. See Boston Consulting Group Report: *The Future is Electric A Decarbonisation Roadmap for New Zealand's Electricity Sector 2022*, page 200.

² Policy 1.

environment is one in which:

- Infrastructure is not adversely affected by incompatible activities; and
- Urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.

10. We note that *Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy 2022 – 2052* emphasises the need to plan for infrastructure networks for our cities before they are required. Otherwise, it may be difficult, if not impossible, to provide them later. The Strategy also emphasises the preparation for future infrastructure should look at all the types of infrastructure and transport that will be needed.³

11. In this context, we strongly support integrated energy planning in developing this Spatial Plan. We explain this further in our submission when we talk more about the potential changes that will be needed to our infrastructure in order to progress the outcomes in this Spatial Plan. We will need as much foresight and prior knowledge as possible of significant changes to urban development and transport planning to provide successfully for the accompanying energy infrastructure.

12. We now set out our comments on the various questions raised in the online submission form.

Summary

13. Orion supports the intent of the draft Spatial Plan, a collaborative vision for how the Greater Christchurch area will grow and develop in the long term will assist Orion to plan effectively and efficiently. That said, how the Spatial Plan is executed and carried forward into the relevant planning documents will be vitally important to achieving that outcome.

³ See *Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy 2022 – 2052*, para 6.3.3, p78. It should consider

- The potential for rapid transit networks in existing and future urban areas, even if they may not be needed in the near future.
- How land can be adapted if needs change. For example, land that's protected for a long-term rapid transit corridor could either be used for a busway or rail line, or converted to other uses.
- Designing street networks so they provide for current and future needs. For instance, street grids that distribute traffic across many routes may be better in the long-term than street layouts that feed all traffic into a small number of major roads

14. For Orion to be able to continue to provide a reliable and resilient supply of electricity to the intensified, and increasingly electrified, city it will need to be able to plan in advance for increasing demand and to have space for the required infrastructure. For this to occur Orion wishes to highlight the following.

Public Transport

15. Orion's ability to respond to changes in demand that result from changes to transportation (whether that is an increase in the use of private electric vehicles or the development of a Mass Rapid Transit (MRT) system that relies on electricity, or both) will be enabled by advance knowledge so Orion can make provision of infrastructure to support that increase in demand. The implementation of the public transport components of the Spatial Plan needs to enable that provision.
16. The Spatial Plan shows an indicative location for a MRT system. Existing Orion infrastructure will need to be considered in the planning of such a system. Relocation of some electricity infrastructure can require a large lead in time and Orion will need to plan for this in advance to avoid delays.

Urban centres and transport corridors

17. Where intensification occurs it can be difficult for Orion to find appropriate locations for the additional infrastructure that is inevitably required to meet the increase in demand. Infrastructure must be located close to the demand and as such Orion have sought amended provisions through Plan Change 14 to the Christchurch District Plan (PC14) and through Variation 1 to the proposed Selwyn District Plan (Variation 1) that require developers of intensified sites to discuss provision of space with Orion as part of the resource consenting of a development. The need to allow for additional infrastructure will continue to be important and should be central in the implementation of the Spatial Plan.
18. Intensification will also result in reduced setbacks from the front of properties and increased height limits; the resulting potential for conflict between electricity lines and built form needs to be addressed when the Spatial Plan is implemented. Orion have sought amendments through PC 14 and Variation 1 to this effect and reiterate here that this will continue to be an issue that should be considered in all areas where intensification occurs.

Natural Environment

19. Orion is supportive of the Spatial Plan's intentions in relation to the natural environment. Orion plays an

active part in maintaining and enhancing the natural environment through significant targeted planting programs. That said, there is a significant risk to Orion's infrastructure, and associated critical service to our community, as a result of negative interactions with vegetation. That risk must be considered when the Spatial Plan is implemented. Where any planting is proposed a collaborative approach needs to be taken to ensure that the planting is located appropriately and that species selection allows for the vegetation to thrive without interference with electricity infrastructure.

Blue-Green Network (Green Belt)

20. The introduction of a Greenbelt to separate urban and rural areas is a concept that Orion supports however, as with all areas of the Spatial Plan, it will be crucial that in the implementation of this concept the importance of installing, maintaining and protecting critical infrastructure is considered. If a Greenbelt was created, Orion would welcome the opportunity to assist in ensuring it is compatible with the continuation and installation of Orion's infrastructure; there may well need to be infrastructure links across blue-green areas to interconnect electricity supply depending on existing services and the layout of our network. Blue-green areas will also need to provide clearance corridors so that vegetation around our distribution network can be better managed.

Priority development areas

21. Orion supports the recognition of priority development areas but reiterates the need to proactively provide for additional infrastructure growth and ensure that existing and new infrastructure is not negatively impacted by intensification through planning provisions. It will also be important when planning for accelerated development and intensification to ensure that coordination with the timing of infrastructure upgrades occurs.

Spatial Strategy

22. Orion has suggested a number of amendments to the draft Opportunities set out in the strategy. The amendments sought are in order to strengthen the ability for Orion to provide a reliable and resilient supply of electricity through the time the Spatial Plan relates to.

Public transport

23. The draft Spatial Plan concentrates growth around urban centres and along public transport

corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

24. Orion supports, in principle, the improved public transport system proposed in the draft Spatial Plan, including the proposed mass rapid transit system. There are two main areas where the execution of the proposed Spatial Plan will need to integrate with Orion's forward planning in order to avoid delay or unnecessary expense and Orion wishes to flag these areas now to ensure the Komiti is aware of the importance of a collaborative approach. The areas of specific interest are the implications of the MRT and broader public transport plans on use overall transport patterns, and hence future electricity demand and charging needs across the sub-region; where the MRT system requires power (and therefore additional infrastructure) in order to operate; and where existing Orion infrastructure is located within MRT corridors and needs to be relocated.

25. We explain further below the modelling work that we are doing to understand future electricity demand and we provide some comments about the practical implications for Orion of the proposed MRT system.

Modelling for future transport electricity demand

26. We expect growing demand for electricity for transport as fossil fuels are phased out of both private and public transport. Changes to network infrastructure will be required to support the growing electrification of transport. The overall demand for transport and mode of transport has a significant impact on how Orion plans for these investments.

27. Changes to our network infrastructure are significant investments and can have long lag times. This means as much foresight and prior knowledge as possible of significant changes to urban development and transport planning is critical. We welcome the opportunity to contribute to this consultation.

28. Orion is currently establishing its Future Energy Scenarios for the Mid Canterbury region. These Future Energy Scenarios are plausible development pathways for energy sector transition in our region over the next 30 years. By planning for different scenarios in 2050 we are able to understand the different potential needs and uses for our network in energy transition.

29. The Future Energy Scenarios will play an important role in local area energy planning. By understanding the changes in demand and generation of energy in our region, we can help to develop a

more collaborative understanding and planning environment for our region's long term energy needs.

30. Understanding the development of transport is critical to developing our Future Energy Scenarios. We are attempting to model different development pathways for demand and mode for transport and we welcome engagement and input from the Komiti on this work.

31. The primary considerations we are attempting to understand for the purposes of electricity network investment are:

a. When electricity will be required; this includes planning for infrastructure to support increasing load over years as transport is electrified, and sizing the network correctly to support the peak demand during the day;

b. Where electricity will be required determines what network infrastructure services the demand. There will be differences in where demand is highest on the network depending on whether people charge private electric vehicles at home, at work, or at charging stations, and where public transport is used and how it uses electricity (depot battery charging or en-route electricity supply).

c. Capacity required to service demand will also depend on the size of the load at any one time. A lot of relatively small private vehicles charging at disaggregated times has a very different network requirement to service than several rapid chargers charging concurrently to service large vehicles like buses.

32. We also need to consider practical implications such as acquiring land to build infrastructure to support transport demand, cross over between existing infrastructure and construction requirements for mass rapid transit routes, and the type of new connections that could be required by proposed mass rapid transit options including housing intensification or infill housing along such routes.

Mass Rapid Transit (MTR)

33. The proposed MRT system is likely to significantly change how demand for electricity in transport develops. By encouraging uptake of public transport, it will essentially concentrate demand from many potential private electric vehicles to larger point loads that service the MRT corridor. It will also likely reduce total demand for transport as more people live closer to where they work in higher density.

34. It is difficult to immediately assess the impact of this on the Orion network. Overall MRT is likely to be more efficient and lower overall energy demand compared to the counterfactual where it isn't developed. It could reduce the need for investment on the low voltage network to support in-home charging of private vehicles in some areas.

35. However, demand for electricity from the MRT could be less flexible, depending on the mode developed, requiring electricity when there is demand for transport, rather than private electric vehicles which have some flexibility in when they need to be charged. Depending on when MRT development occurs it could bring demand for electricity forward, if it is built ahead of mass private vehicle electrification, requiring earlier investment on the network. This will also require more complex and larger connections to the network.

Practical Implications for Orion

Planning Implications

36. Orion's ability to respond to changes in demand will depend on our ability to be flexible in the provision of infrastructure. In this sense it is important that the planning provisions that flow from the Spatial Plan allow for Orion to obtain additional space for infrastructure when and where it is required. Planning provisions will also need to recognise the importance of protecting Orion infrastructure in a changing environment that is likely to result in a more intense built form with a higher risk of negative interaction between built form and infrastructure.

37. Orion has submitted on Plan Change 14 to the Christchurch District Plan (PC14) and Variation 1 to the proposed Selwyn District plan (Variation 1) seeking the inclusion of provisions that allow for additional land to be set aside where intensification of a site occurs and the increase in demand means additional infrastructure is required. Enabling the upgrade of infrastructure in line with development that increases demand will be key to ensuring Orion is able to respond to that demand.

38. The ability for Orion to enable the MRT and broader electrification of our transport system, will require similar proactive, least-regrets planning, investment and flexibility. As set out above, whether the demand is to enable the charging of individual electric vehicles at home, or some form of MRT, it will require consideration as early as possible to allow Orion to support it. Provision in the planning framework to facilitate a range of scenarios will be required in order to ensure provision of electricity to meet the need.

Interface between proposed MRT and existing Orion Infrastructure

39. In addition to the provision of additional infrastructure to meet the likely increase in demand for electricity, there is potential for a MRT system to be located across, or in close proximity to, areas where Orion has significant infrastructure already in place. In some cases, the introduction of an MRT system will require the movement of the electricity infrastructure, as colocation would not be practical or feasible. This is likely to be a concern in any location that is suitable for MRT and Orion wishes to highlight the importance of communication and timing to enable investment in changes to Orion infrastructure where that is required.

40. An example of where colocation of Orion infrastructure and MRT would not be compatible is where high voltage cables run underground, either where an MRT route is proposed or in close proximity to the route. If movement of infrastructure is required, Orion will require as much time as possible to allow for planning and the physical relocation. Prior to the physical works commencing there is significant planning required, including design, resource consenting and procurement; these processes can take years to complete.

41. As an example of the time required for some projects, Orion is currently undertaking a 15 year project to upgrade the high voltage underground network within Christchurch City. Attached and marked "A" are images showing the works currently underway to install high voltage cable underground in the section between the Milton and Bromley zone substations on Ferry Road and setting out timeframes for the physical works. In this example the cable was ordered approximately 18 months prior to being available for use. Planning and design for the works commenced approximately 5 years before physical works commenced.

Orion Infrastructure located along the proposed MRT routes

42. The map below shows the approximate MRT Routes.



43. Orion has used the map above to calculate the following approximate list of assets that sit within or immediately adjacent to the MRT route such that they might be affected by the route:

1. 131x Sites:
 - i. 88 Kiosk Substation Sites
 - ii. 15 Outdoor Substation Sites
 - iii. 12 Building Substation Sites
 - iv. 6 Primary Network Centre Sites

- v. 6 Undeveloped Sites
 - vi. 2 Zone Substation Sites
 - vii. 2 Pad Mount Transformer Sites
2. 151 poles
 3. 863 Distribution boxes
 4. 338 Distribution cabinets
 5. 2,900m of overhead lines
 6. 2,438m of 33kV/66kV underground cable
 7. 160,970 of underground cable (11kV, low voltage, out of service or street light)

44. The extent of infrastructure that will need to be relocated will depend on the specific location of the MRT within the corridor and the nature of the MRT system, however Orion wish to reiterate that these works will take some time and communication will be central to ensuring there are not delays.

Urban centres and transport corridors

45. According to the draft, concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

46. In principle Orion supportsthe focus of future development and investment around urban centres and transport corridors. In order to ensure that intensification in these (or any) areas is successful and that there is a reliable and resilient supply of electricity, there must be consideration given to how and where the upgrading of infrastructure that will inevitably be necessary is to occur.

47. As with transport, housing development has significant impacts on our investment in network infrastructure. Orion is attempting to model these potential changes, including the potential energy system impact of housing intensification and typology; building energy efficiency; industrial development and decarbonisation; and transport plans, as part of our Future Energy Scenarios, in order to understand how

different outcomes can change energy demand and so enabling investment in the electricity network. We welcome the opportunity to engage with the Komiti on the Spatial Plan and would welcome the opportunity to engage on the development of our Future Energy Scenarios.

48. The Mass Rapid Transit corridors and intensification in surrounding areas and urban centres will have a significant impact on requirements for network investment. New houses need to be connected to the network and serviced from existing infrastructure. High density infill housing can have high impacts where individual properties with a single connection suddenly become multiple units servicing many households. The speed of change, particularly for infill housing, can have impacts where there are lags for building infrastructure. Space for new 11kV/415V transformer kiosks is required in conjunction with high density infill housing.

Practical Implications for Orion

49. As traversed in the section above, Orion has submitted on PC14 and Variation 1 that are currently being consulted on. The Orion submissions seek amendments to the provisions as notified to ensure that where there is intensification of lower density areas, the provision of additional infrastructure is not only possible but actively enabled.

50. The Orion submissions on PC14 and Variation 1 have also sought that where the density of built form is likely to be higher (in medium and high density zones) there are setbacks from all electricity infrastructure to ensure that where the built form is closer to the boundaries of properties and greater in height the likelihood of negative interactions is reduced.

51. Without the amendments sought by Orion, the ability to react and ensure reliable supply of electricity will be difficult. The infrastructure most commonly required to meet such increases in supply is fixed in size and needs to be located in close proximity to the demand.

Natural Environment

52. The draft Spatial Plan notes that the natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

53. Orion **supports** the proposed approach to maintain and enhance the natural environment within our urban areas. We very much agree that a healthy natural environment is intrinsically linked with the wellbeing of people and places. Blue-green networks provide a number of benefits including improving the overall quality of both urban and rural environments and mitigating the impacts of climate change and providing adaptation benefits. This is in keeping with our purpose of “Powering a cleaner and brighter future with our community”, and our focus area of being a Force for Good in the Communities we Serve

54. By way of example, Orion’s native forest carbon offsetting programme has now been launched thanks to two historic partnerships with local landowners committed to bringing new life to their land in Banks Peninsula.

55. On the whenua in Purau Bay we planted 21,000 kanuka seedlings in the 2022/2023 financial year. With additional planting of various other native species in subsequent years, this forest will sequester an average 95 tonnes of carbon dioxide per year over the next 50 years. It is also a win for biodiversity which is important for healthy ecosystems as well as protecting a major waterway into Whakaraupō (Lyttelton harbour).

56. In February 2023, Wairewa Rūnanga and Orion Group signed an agreement to recloak up to 280 hectares of Te Kaio farm, a 280-hectare block of ex-farmland near Wairewa, Little River, belonging to the Rūnanga. Orion is bringing forestry expertise, capital, and personnel to the project, with Te Kete o Wairewa, the legal entity of the Rūnanga, supplying the land and a mātauranga Māori lens.

Practical Implications for Orion

57. The draft Plan refers to supporting the development of local area plans, urban greening strategies and forest plans, new guidelines and regulations that support urban greening and increased tree cover as well as exemplar or demonstration projects. This is a sound approach but these plans and strategies will need to take into account the requirements of infrastructure in and around these areas. For example, there may well need to be infrastructure links across blue-green areas to interconnect electricity supply depending on existing services and the layout of our network. Blue-green areas will also need to provide clearance corridors so that vegetation around our distribution network can be better managed.

58. Orion has identified that trees and vegetation constitute a medium to high risk to Orion’s infrastructure. Recent weather events in the North Island have unfortunately demonstrated this, with a

significant percentage of the power outages occurring as a result of trees and vegetation on power lines.

59. As detailed in our Asset Management Plan for 2023-2024⁴

Orion's network has 6,000km of overhead lines that are more susceptible to the risks posed by vegetation growth. Many of these lines run parallel to property fence lines and in rural areas, they are often lined with hedges and trees for shelter belts. These hedges and trees, along with other vegetation encroaching on the power network pose significant risks to our overhead line assets and our service providers and the public who are near them. Without regular vegetation maintenance trees and hedges begin to encroach on the overhead network and can cause power outages, damage, injury and fires.

In some cases, outages caused by tree colliding with our lines can cause lengthy outages, with widespread impact on communities.

60. Our Climate Change Opportunities and Risks report⁵ indicates the growth rates for vegetation are likely to increase due to warmer and wetter conditions because of climate change. The report also indicates our biggest physical risk from climate change is likely to be from vegetation on our overhead lines causing power outages, severe storms, and drier conditions increasing the risk of fire.

61. Consequently, we want to emphasise that in "greening" the blue-green areas, a collaborative approach with infrastructure providers will be key when it involves planning and planting. Plans will need to allow for the realities of how a distribution network operates. Ensuring planting is undertaken in appropriate locations, and ensuring appropriate species are selected where planting is in the vicinity of infrastructure providers will be critical to the success of the blue-green network.

⁴ See <https://www.oriongroup.co.nz/assets/Company/Corporate-publications/Orion-AMP-March-2023.pdf>

⁵ See <https://www.oriongroup.co.nz/assets/Company/Corporate-publications/2020-Orion-Climate-Change-Report.pdf>

62. Trees interfering with power lines and tree roots interfering with underground cables can (and frequently does) result in damage to the network and ultimately in the removal of the tree. Orion already spends considerable time and expenditure⁶ in addressing such damage and is eager to ensure that future planting is not undertaken in a way that results in further damage to infrastructure and the need to remove vegetation.

Blue-Green Network (Green Belt)

63. As the documentation notes, one aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a green belt. This potentially has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

64. Orion supports in principle the concept of a green belt around our urban areas and further investigation of this concept subject to our comments below.

65. At Orion, for planning purposes, our network is divided into two regions rather than urban and rural:

1. Region A – Christchurch city and outer suburbs, including Prebbleton, approximately 83% of our customers,⁷ and
2. Region B⁸ – Banks Peninsula, Selwyn district and townships, approximately 17% of our customers.

⁶ For example, we have budgeted \$4,300,000 in vegetation management operational expenditure for 2024 financial year.

⁷ Region A Grid Exit Points (GXPs) are located at Islington and Bromley and supply Christchurch Central City, Lyttelton and the wider Christchurch metropolitan area. Islington and Bromley 220kV substations form part of Transpower's South Island grid. They interconnect between the major 220kV circuits from the southern power stations and our 66kV and 33kV subtransmission network. Islington has a 66kV and 33kV grid connection, while Bromley supplies a 66kV grid connection only.

⁸ Islington GXP also supplies a large part of the Region B network including Banks Peninsula, milk processing near State Highway 1, irrigation east of State Highway 1, and the Dunsandel, Rolleston and Lincoln townships. Hororata and Kimberley GXPs supply a significant proportion of inland irrigation load and milk processing. These two GXPs have a connection to the double circuit 66kV line between Islington and the West Coast with generation injection at Coleridge power station. Transpower provides a 66kV connection at Kimberley and a 66kV and 33kV connection at Hororata. Norwood GXP, when operational, will also supply this area. The remainder of Region B is fed at 11kV from three small GXPs at Arthur's Pass, Coleridge and Castle Hill. Together these supply less than 1% of our customers and load.

68. We also refer to our comments above about the risks of planting near electricity infrastructure. This is an issue that Orion is already required to address, the prevention of further negative interactions will need to be considered to ensure reliability of supply and to reduce ongoing cost for consumers in our region.

69. If this proposal progresses, we would be able to work with the Komiti to assist in the development of a successful green belt action plan.

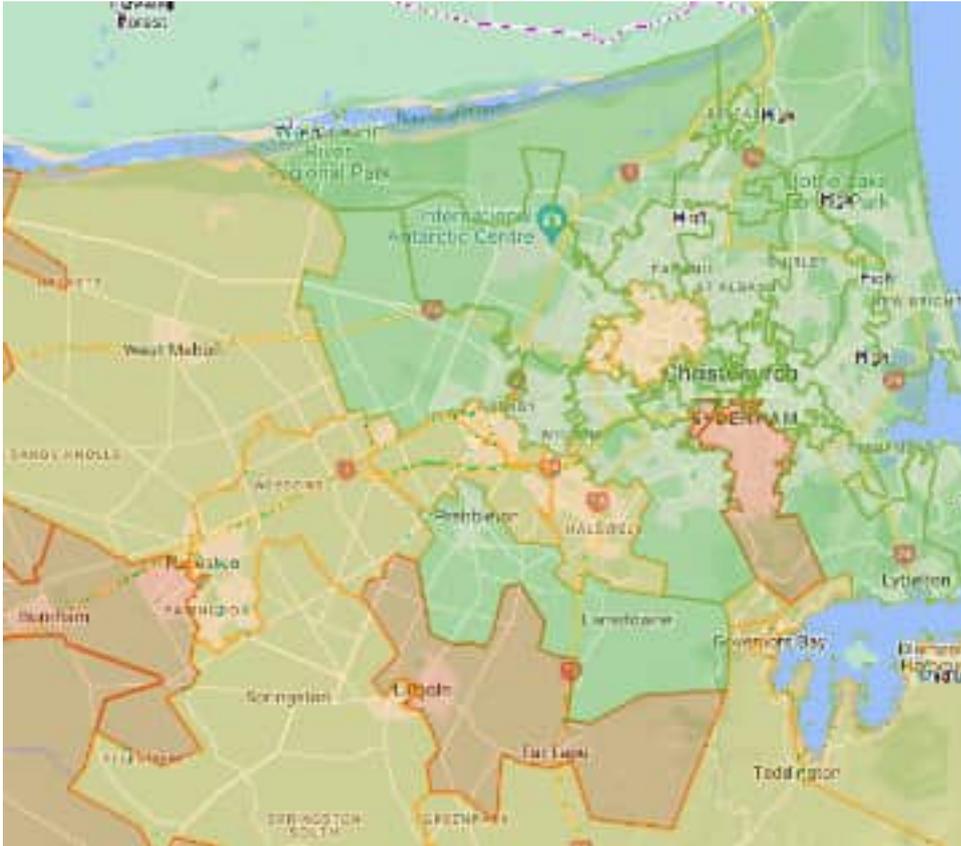
Priority development areas

70. Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. The draft plan notes that these are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration.

71. The Priority Development Areas in the draft Spatial Plan are Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

72. Orion supports in principle the approach to focus on these areas but reiterates the concerns raised above, that the implementation of the Spatial Plan will be of vital importance to the success of its goals. Provisions must be included in policies and plans that actively address the need to upgrade infrastructure to meet increased demand.

73. The map below shows areas where bulk electricity provision may currently be constrained until infrastructure is upgraded. Some of the priority areas fall within red or yellow areas and, as such, the timing of intensification or acceleration of development may need to be planned with an eye to when adequate infrastructure can be provided. Equally, electrification and development in other currently 'green' areas may lead to additional network constraints, depending on a range of drivers and levers which we are exploring through our future energy scenarios, and would be keen to discuss with the Komiti.



74. There are plans for upgrading the bulk supply to some of the red and yellow areas (for example in Rolleston and Halswell), but timing of those upgrades will vary and as such any additional development that results in significantly increased demand will have to be planned to occur in conjunction with the relevant upgrades.

Spatial Strategy

75. The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. It sets out the spatial strategy.

76. Orion **supports** the spatial strategy in principle but submits that some of the directions contained in the opportunities could be further amended or expanded as follows:

Opportunity 2

77. Page 60 and Map 9 refers to protecting strategic infrastructure, noting that urban development should be avoided around strategic infrastructure to ensure the safety and wellbeing of residents and to

safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network (see Map 9).

78. There is no specific link to this discussion in terms of a direction statement corresponding to an opportunity. In our view, Map 9 better corresponds with the discussion under direction 5.3. We suggest that Map 9 is moved to this part of the plan along with a new direction statement referring to the protection of strategic infrastructure. We also ask that this discussion is amended to refer to **electricity distribution** as well as electricity transmission. The distribution network is shown on the map but given its importance should also be specifically referred to in the accompanying narrative.

Opportunity 4

79. Direction 4.2 should be expanded as follows:

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

80. In our view this is crucial to achieving the opportunities identified in the strategy. Early identification of land interests needed for infrastructure for housing and transport developments will better enable this opportunity to be achieved. Ultimately, we think this will be of lower cost in the long run and minimise social disruption.

81. Direction 4.4 should be amended as follows:

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

82. We want to emphasise the importance of energy efficient buildings and healthy homes. Energy efficient buildings, especially housing, is critical for an efficient, lower cost / higher societal benefit overall transition to a decarbonised energy system. From our point of view, there is little point in New Zealand investing billions of dollars to enable a low carbon energy system, if the renewable energy supplied to heat, cool, light and maintain a building simply ebbs away through poorly designed, constructed and/or operated buildings. For housing this would further contribute to substandard conditions and energy hardship, as well

as driving our winter peak electricity demand, associated investment in infrastructure, and ultimately costs to our community.

Opportunity 5

83. Direction 5.1 should be amended to also refer to energy infrastructure as follows:

*5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links, **energy infrastructure** and the centres network*

84. Many of our commercial and industrial customers are exploring electrification as a pathway to decarbonise their process heat, replacing existing coil boilers and other fossil fuel energy sources. The resulting significant increase in electricity demand will require enabling investment in our network infrastructure.

85. Direction 5.3 should be amended as follows:

*5.3 Provision of strategic infrastructure that is resilient, efficient, **integrated** and meets the needs of a modern society and economy*

86. The discussion in relation to direction 5.3 refers to establishing strong partnerships with providers of energy and digital technologies, and ensuring that the planning for telecommunications and energy infrastructure is well integrated with new development. We think this should be emphasised in the opportunity itself.

87. We also highlight the need for a strong focus on energy resilience in the face of increasing climate change physical risk; our community's exposure to earthquakes, particularly an Alpine Fault event; and society's increasing reliance on electricity for critical services, including communication, transport and heat, and so vulnerability to outages.

88. See also our discussion about Map 9 as set out above.

89. In addition to strengthening electricity infrastructure, we see the potential for a network of community energy / resilience hubs as an enabler of community disaster resilience, and potentially broader community benefits. There may be benefit in considering the location and design of such hubs in the Spatial Plan, and we would welcome the opportunity to explore this with the Komiti.

Opportunity 6

90. We submit that a new direction should be included that allows for the electrification of the transport network. For example:

6.5 Enables and supports the electrification of the transport fleet including through charging infrastructure

91. As we have said above, we expect growing demand for electricity for transport as fossil fuels are phased out of both private and public transport. We acknowledge and fully support the focus on changing people's travel behaviours and shifting the focus from single occupancy vehicles to more sustainable modes. In addition, the electrification of the transport fleet will be critical to support decarbonisation of the region, and require significant and timely enabling changes to network infrastructure.

92. Charging infrastructure will also be integral to the electrification of the transport fleet. This will include residential charging (on and off street), commercial charging, and workplace charging. The spatial strategy will need to dovetail with the Government's electric vehicle charging strategy when that is finalised and released.

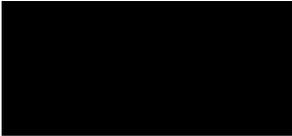
93. People and freight mode shift; the rate of uptake of electric vehicles across our region; together with where, when and how these vehicles are charged, are all important drivers of electricity infrastructure investment, highlighting the importance of integrated planning to achieve our decarbonisation goals.

Concluding comments

94. Thank you again for the opportunity to provide this submission. We would like to be heard in support of our submission when the Komiti holds hearings.

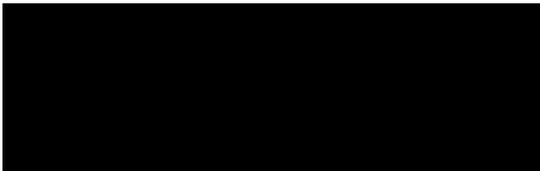


Yours sincerely



Sam Elder

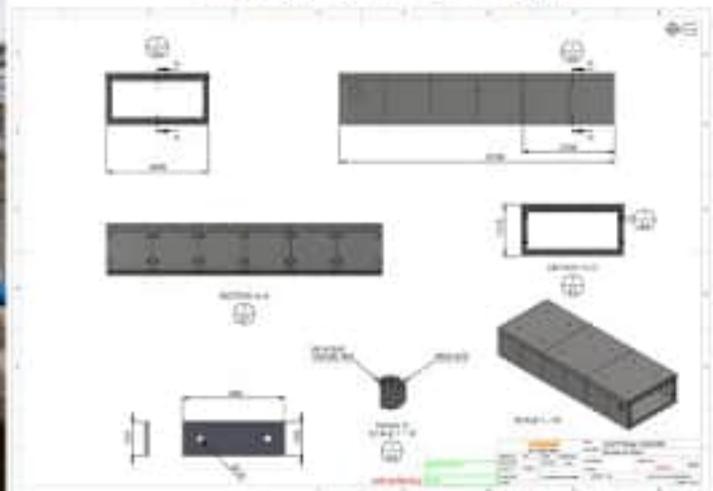
GM Energy Futures



Relocating cable will also require the installation of two joint bays at either end. Below images show joint bay sizing and cable pull set up area required.



Pre-Cast Joint Bay Design



Benefits

- Strong shoring structure – load rated for vehicles
- Allows for temp reinstatement
- Quicker installation - 2 days faster per bay saving traffic management & site security
- Better trench hygiene than plywood alternative
- Fit jointing container
- Seismically rated & removes requirement for encasing joints in thermal concrete



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Richard **Last name:** Johnson

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

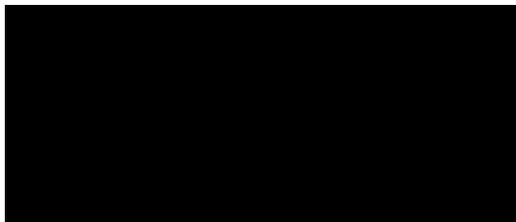
Attached Documents

File
230723_Submission_Greater_Chch_Spatial_Plan - Richard Johnson

Submission: Greater Christchurch Spatial Plan

23 July 2023

Submitter: Richard Johnson



Thank you for the opportunity to contribute my thoughts to the GCSP.

I've been involved in planning in Chch since the 1970s and the second review of the Chch City Plan.

My first thought is that there seems little regard has been given to the history of land use and political decisions that have shaped the city we have today (pre-earthquake). The earthquakes simply threw some urgent land use decisions in to the mix that will now be a factor in forward thinking eg Red Zone, the further retail and employment hollowing out of the city centre, and the overdue concentration of key services such as Justice precinct and the convention/ hotel/ stadium/ sports centre mix right in the centre.

The GCSP does not seem to have adopted a whole of community future focus framework around which or from which the various statutory documents can draw. While it is dominated by a housing/PT focus it does not seem to set out a balanced/ whole of community assessment. The focus on delivering from the NPS-UD may skew the analysis and proposals?? The NPS does require, among a number of things, a proposal that:

- sets out how well-functioning urban environments will be achieved; and
- how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.

I read those requirements to require a whole-of-city point of view, providing responses for the whole urban ecosystem. I don't think it does that well. Otherwise how do you account for the rather limp approach to the east of the city, and New Brighton in particular? The proposals seem to be a nod towards an area of long-standing under-investment (planning and infrastructural neatly captured by the unresolved compost facility issue and the sewage treatment plant rebuild post the fires) by the Council and Government agencies. Not making it one of the Priority Action Areas (PAA)

demonstrates to me a bias towards a simplistic view of the future of the City being based on public transport and the need to have beds on the corridor, and a cherry pick of PAAs and regional centres (beds near shopping).

I'm not convinced that the GCSP addresses well the questions of what we want as an outcome from the GCSP in 50 years (not just NSP-UD driven numbers but look and feel and how that affects individual, community, business behaviours and decisions?)

Christchurch has a base urban form reflected in the spatial plan diagram. This underlying urban form has evolved since its settlement:

1. Central core based on Hagley Park, four belts and central business/ services/ retail core.
2. Urban villages (old boroughs).
3. Concentric form constrained by the coast to the east, hills to the south and Waimakariri River to the north.
4. A hub and spoke connection network connecting all parts of Chch. This radial network form is evident in the spatial plan diagram.
5. The hub and spoke foundation has survived decisions over the years (pre-earthquake) to provide new hubs of social/ business enablement/ connection
 - a) A hierarchy of shopping centres dominated by the big hubs of Northlands, Shirley, Linwood, Riccarton
 - b) Decentralisation of employment that was originally based around the rail and Sydenham, Addington, Woolston, central city and dispersed to Blenheim Rd, Moorhouse Ave, airport, Hornby and Belfast
 - c) Concentration of hospital services at Hagley, Princess Margaret and St Georges in Merivale.
 - d) Proliferation of commercial and social services out into residential areas.
 - e) Movement of the University out to Ilam.
6. There are many "mini-nodes" that provide a local community focus that are not recognised and are not given a role in the GCSP. They, at their own level, have been part of the successful Chch radial pattern of hubs and spokes providing a way point to and from the central city. They are, have potential to be, and can be enabled to contribute to the goals of GCSP as "urban villages"; in many ways these mini-nodes or villages have always had a core servicing/ community services component. As such they are well positioned to support

higher density adjacent to the nodes with community focus, community facilities and services.



One of the overarching directions of the GCSP is to *“Focus growth through targeted intensification in urban and town centres and alongside public transport routes”*.

That direction has merit at a strategic level but its proposed implementation in the GCSP is unnecessarily restricted to just the central spine. This spine only links up a very small part of the concentric shaped city. The central spine forces travel at distance between the main modes linking up nodes that have little functional relationships or inter-dependencies. Movement along the spine or between nodes on the spine is not enabled by non-vehicle means. It is not a walkable, low intensity travel option. It appears to provide options only for those on or immediately adjacent the spine. It caters for only a small part of the bigger Chch community (if the extent of orange to grey on the spatial plan is a guide).

Conventionally strategic plans adopt a framework based on:

1. Work

2. Play
3. Live

The interaction between these and the interplay between them is what creates and sustains a community. It has a focus on localism as community well-being is better derived from near at hand relationships not costly (time and resources) travel.

A more sustainable option would be based on further enabling the widespread opportunities for growth and intensification in the “village communities’ that are present and well established in Chch. These urban villages need to be supported and enabled to thrive and grow to support the social/ community and business services that are already there. These areas need support and planning investment to secure a sustainable future contributing to the growth targets and housing/ business/ community facility needs of the whole city. There needs to be a focus on self-sustaining urban communities that have a neighbourhood focus to reduce the need to travel to the spine to secure services and get access to facilities. These village communities will:

1. Provide local opportunities at scales that may better contribute to the concentric urban form of Chch (clearly evident in the spatial plan diagram), supporting a well-functioning urban area (which is more than just a spine and large urban nodes on that spine; it is all that area encircled by the hatched green line on the spatial plan); and
2. support a more responsive and flexible growth option as opportunities are spread across a spectrum of socio-economic areas, of different age and condition housing stock; and
3. create growth and intensification options in places where core services and facilities are already present and do not need to be created; and
4. provide a distributed system supporting growth and intensification reducing the risks associated with concentration of assets and community investment in to fewer options; and
5. ensure resilience by many points of growth and development drawing on existing patterns of development and so not exposing the overall goal to implementation risks from fewer locational options and a limited form of intensification and growth.

The fundamental form of Chch is almost fixed. I support that GCSP does not suggest a radical re-shaping of that form. GCSP should be supporting a 50 year outcome that supports and reinforces the distributed community form and not try to create a new form on a set of considerations driven and dominated by public or mass transport supported by a mode shift by people living in more dense developments as the underpinning rationale.

The urban village or village community clustered approach is a more efficient contributor to urban form and to a well-functioning urban environment than the proposed spine and regional nodes proposed.

The role of local nodes or urban villages should be recognised and enabled in the GCSP in support of:

1. *Opportunity #4: Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs*
2. *Opportunity #6: prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.*
3. *Key move #2: A strengthened network of urban and town centres*

But to be future focussed, and to build on the existing community and private assets of these distributed local nodes, the GCSP should provide an enabling policy framework that supports a sustainable urban form for Chch. That framework should specifically provide for growth options consistent with a local urban form that is supportive of intensification and a range of transport modes not just PT.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 8 August 2023 8:55 am
To: [REDACTED]
Subject: Re: Submission on Greater Christchurch Spatial Plan

Hi Cathy
Sorry I did not indicate but yes please may I have a speaking slot.
Thank you
Richard

On Wed, 2 Aug 2023 at 11:47 AM, [REDACTED] wrote:

Kia ora Richard

Thank you for your submission and taking the time to share your views on the Greater Christchurch Spatial Plan.

Would you like to speak to the Hearing Panel regarding your submission? Hearing days are likely to be at the end of October and beginning of November. We will be in touch with submitters who have indicated they want to be heard separately in due course. Please note, the Hearing Panel will consider your submission regardless of whether you choose to speak.

Ngā mihi

[REDACTED]



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Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Cole **Last name:** O'Keefe

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Waka Kotahi NZ Transport Agency

Your role in the organisation and the number of people your organisation represents:

Manager Strategic System Planning (Acting) - System Leadership

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Waka Kotahi - Draft Greater Christchurch Spatial Plan submission



Submission on the Consultation of Draft Greater Christchurch Spatial Plan

By Greater Christchurch Partnership

To: Greater Christchurch Partnership

Uploaded to [<https://greaterchristchurch.org.nz/urbangrowthprogramme/make-a-submission/>] on 21 July 2023 in PDF format

Submitter: Waka Kotahi NZ Transport Agency

WAKA KOTAHI NZ TRANSPORT AGENCY'S SUBMISSION:

1. Waka Kotahi NZ Transport Agency (Waka Kotahi) welcomes the opportunity to provide feedback through our submission on the Draft Greater Christchurch Spatial Plan (Draft Spatial Plan). This submission addresses key parts of the Draft Spatial Plan which Waka Kotahi supports, together with areas Waka Kotahi considers could be clarified and some that could be strengthened.
2. Waka Kotahi continues to work with our partners of Whakawhanake Kāinga Komiti and Greater Christchurch Partnership on this Draft Greater Christchurch Spatial Plan/ Future Development Strategy (FDS). This includes working with the Council team to:
 - finalise the Draft Spatial Plan with the incorporation of feedback received from this consultation procedure
 - further develop the joint work programme and implementation plan.

Waka Kotahi NZ Transport Agency's Statutory Functions, Powers and Responsibilities

3. The Waka Kotahi statutory objective under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
4. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport (GPS)¹. This sets out four strategic priorities, which are relevant to this submission:
 - **Safety:** Developing a transport system where no one is killed or seriously injured.
 - **Better Travel Options:** Providing people with better transport options to access social and economic opportunities
 - **Climate Change:** Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.
 - **Improving Freight Connections:** Improving freight connections for economic development.
5. The Ministry of Transport (MoT) have developed a Transport Outcomes Framework. It sets out the purpose of the transport system is to improve people's wellbeing, and the liveability of places. It does this by contributing to five key outcomes, summarised in the diagram below.



6. The National Policy Statement on Urban Development (NPS-UD) provides a framework supporting strategic transport outcomes through the integration of land-use planning and infrastructure provision. The NPS-UD also provides the key policy direction for the development of the FDS.
7. Policy 1 of the NPS-UD is of particular relevance to the outcomes of the FDS from a transport / land use integration perspective (highlighted bold for emphasis):

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- *have or enable a variety of homes that:

 - i. *meet the needs, in terms of type, price, and location, of different households; and*
 - ii. *enable Māori to express their cultural traditions and norms; and**
 - *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
 - ***have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and***
 - *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
 - ***support reductions in greenhouse gas emissions; and***
 - *are resilient to the likely current and future effects of climate change.*
8. The Emission Reduction Plan / Te hau mārohi ki anamata (ERP) sets out a pathway to an approximate 41% reduction (on 2019 levels) in New Zealand's carbon emissions by 2035. Transport is expected to play a crucial role in meeting this target. The transport chapter of the ERP includes several nationwide sub-targets for 2035:
 - reduce vehicle kilometres travelled (VKT) by 20% (versus baseline 2035 forecast)
 - increase zero emissions vehicles to 30% of light fleet
 - reduce freight emissions by 35%
 - reduce the emissions intensity of transport fuel by 10%.
 9. To deliver on Government outcomes, including those set by the GPS, Emission Reduction Plan, NPS-UD and the Transport Outcomes Framework, Waka Kotahi has developed strategies relevant to the Draft Spatial Plan. These are Arataki – our 30 Year Plan, Toitū Te Taiao (sustainability action plan), our urban development position statement. These documents provided guidance to the development of this submission. For further details, copies can be found at our website.

Feedback on the Draft Greater Christchurch Spatial Plan

Please note that the structure of this section aims to align with the online form

Public transport system proposed in the Draft Spatial Plan

10. Waka Kotahi supports the direction for improvements to the public transport system and its interrelationship with the future development direction set out in this Draft Spatial Plan. It is to be noted that the exact location, design, scale and funding decisions on the components will be progressed through separate but aligned and integrated planning and investment decision making processes.
11. *Page 38 – A mass rapid transit system.* Waka Kotahi supports the integration of the Mass Rapid Transit (MRT) system within the wider land transport strategic direction and approach, as this will provide for improved transport facilities within Greater Christchurch and is integral to supporting and enabling the planned improved urban form.
12. The preferred route for MRT that will connect Christchurch's Central City with Riccarton, Papanui, Hornby and Belfast, as per Map 3, is supported by Waka Kotahi. These routes are integrated and support the increased intensification and associated medium density and high-density zones proposed under Christchurch City Council's Plan Change 14.

Focus of future development and investment around urban centres and transport corridors

13. *Map 2* - Waka Kotahi supports the direction for future housing development around urban centres and along public transport corridors. In particular, the focus to enable greater intensification and higher densities around centres and public transport routes as identified in *section 4.3*. Waka Kotahi considers this a critical factor to successfully provide good quality, frequent public transport services and active mobility choices that are attractive and sustainable. The benefits of such intensification provide positive outcomes that support broader strategic outcomes including emission reduction and VKT reduction.
14. Waka Kotahi supports the need for sufficient development capacity for housing in Greater Christchurch. As stated in section 4.2, there is sufficient housing capacity for the medium (0-10 years) and long term (0-30 years), as a result of the recent greenfield areas being rezoned, from the NPS-UD and Resource Management (Enabling Housing Supply and Other Matters) Amendment Act. Waka Kotahi supports this alignment with planned medium- and long-term investment in the transport system, enabling sufficient housing supply within existing zoned areas allows for better utilisation and optimisation of existing transport infrastructure, and a clearer forecast of maintenance and operational needs for the sub-region.
15. Furthermore, with reference to the research on Household Expenditure on Infrastructure Services published by NZ Infrastructure Commission, which indicates an average household is likely to spend more than half its income on transport. The focus to enable people to live within accessible locations of existing amenities will contribute towards improving living affordability.
16. Waka Kotahi would like to recognise the potential impact of some of the qualifying matters being proposed under Christchurch City Council Plan Change 14 – Draft Housing and Business Choice Plan Change, which may limit development potential and the realisation of the direction and outcomes set out in the Draft Spatial Plan. We note this is being considered under a separate planning process.
17. Waka Kotahi would also like to understand how the Proposed Airport Noise Contour and the corresponding development enablement policy, could limit development potential and the realisation of the direction and outcomes set out in the Draft Spatial Plan. We note this will be considered through the review of the Regional Planning Statement by Environment Canterbury under a separate planning process in due course.

Maintain and enhance the natural environment within our urban areas

18. Waka Kotahi supports integration of the natural environment within our urban areas, in particular on the utilisation of natural solutions to tackle known hazards such as stormwater management or noise barrier to reduce reverse sensitivity.

Concept of greenbelt around our urban areas

19. Waka Kotahi supports the concept of a Greenbelt around urban areas and encourages the consideration of integrating walking and cycling access within its design and implementation to better connect the urban areas with the natural environment.

Approach to Priority Areas and Priority Development Areas

20. Waka Kotahi supports a coordinated approach to address the specific needs of the Priority Areas/ Priority Development Areas identified in the Draft Spatial Plan, as this approach will enhance integration and ensure alignment with the delivery of infrastructure and development in the right place at the right time. Waka Kotahi supports the Joint Work Programme illustrated on page 90 and would like to work closely with our partners to further develop the sequence of activities, as part of the implementation plan.
21. With reference to paragraphs 16 and 17 above, Waka Kotahi would like to work closely with Council under the separate planning processes to understand the potential impact of these and how they may limit the potential of planned priority development opportunities in the short to medium term.

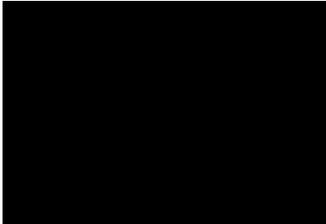
Outline of the Draft Spatial Strategy

22. Waka Kotahi considers the proposed six opportunities, the set of directions and key moves identified in the Draft Spatial Plan aligns with the strategic direction set out in the Transport Outcomes Framework, the NPS-UD, the ERP and other Waka Kotahi strategies, as listed above.
23. Waka Kotahi supports the areas that should be protected and avoided from land development, as identified in Map 5, which includes strategic infrastructure (state highway, railway, airport, etc), sites and areas of significance to Māori, environment areas and features, groundwater protection zone, and highly productive land. These identified areas support long-term investment decisions for the transport system in accordance with where land development occurs.
24. Waka Kotahi supports the inclusion of the State Highway Corridor as part of the strategic infrastructure (Map 9) of which its function will be considered as part of urban growth and land use is appropriately integrated with the strategic transport networks and wider system. This will promote the safety and wellbeing of residents while safeguarding the effective operation, maintenance and potential improvements of this infrastructure overtime.

WAKA KOTAHI NZ TRANSPORT AGENCY WISHES TO:

25. Waka Kotahi NZ Transport Agency wishes to be heard in support of this submission.

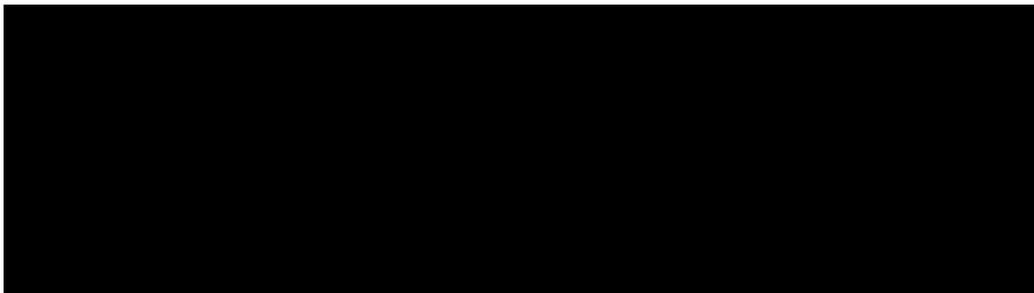
Dated the 21st day of July 2023



Cole O'Keefe

MANAGER STRATEGIC SYSTEM PLANNING (ACTING) – SYSTEM LEADERSHIP

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Andrew **Last name:** Mactier

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Fletcher Living

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Fletcher Living Submission on the Draft Greater Christchurch Spatial Plan

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: **Greater Christchurch Partnership**
huihuimai@greaterchristchurch.org.nz

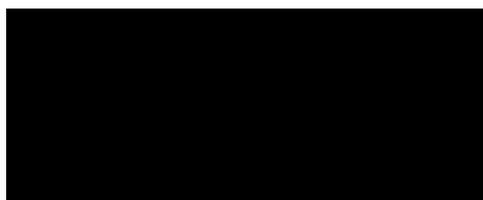
1. Submitter Details

Submitters name: **Fletcher Living**

Address For Service:

Contact person:

Phone:



2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan). We commend the Greater Christchurch Partnership in commencing the development of a Future Development Strategy for the Greater Christchurch area that provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future.

Details of our submission on the Spatial Plan are set out below.

2.1 Do you support the improved public transport system proposed in the draft Spatial Plan?

✓ In Part

Reasons

We support the improvements to the public transport system in principle, but it is not clear that the delivery of the Mass Rapid Transit system (MRT) system as proposed is feasible nor affordable and have concerns that any focus on implementing the proposed MRT will come at the cost of not delivering on an improved wider public transport system for the Greater Christchurch area.

The Spatial Plan has a very strong emphasis on a MRT system. Focusing on the proposed MRT should not come at the cost of improving the existing public transport system, particularly the public transport system which does not meet the current needs of the community.

While we recognise that Opportunity 6 of the Spatial Plan seeks to '*prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities*' it is not clear how or when this will be achieved. Delivery of a satisfactory public transport system that meets the current needs of the community in the Greater Christchurch area has been a perennial issue for those agencies responsible for delivering the public transport system. Much of the Spatial Plan's direction is predicated on

increased residential densities to provide a critical mass to support public transport. Aside from MRT, there is little clarity on how public transport services will align with greater housing density.

The current public transport system does not adequately serve existing urban areas with a service that meets the needs of the community and there do not appear to be any plans to improve, or even provide public transport into recently developed urban areas, areas which are currently being considered for rezoning for urban expansion in parts of Greater Christchurch, or to service areas which are signalled for further intensification through the Spatial Plan and subsequent processes.

Given the above it is difficult to be confident that the transformational shift in transport choice, from private motor vehicle to public transport, as articulated and envisioned by the Spatial Plan is achievable and that the anticipated reduction in carbon emissions will transpire as intended.

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

✓ In Part

Reasons

In principle there may be sound rationale to focus development and investment around urban centres and along transport corridors. However, we have concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these areas, and making this a focus of the Spatial Plan.

Encouraging and providing for future development should not be limited to areas around the “significant urban centres” and “core public transport routes” shown on Map 2. A broader approach for future development throughout Greater Christchurch is required for the reasons addressed below.

Firstly, due to the large number of additional dwellings and associated services that will be required over the next 30 years and beyond it is important to enable denser development throughout Greater Christchurch and not just focusing on Christchurch City, subject to avoiding land which has important values or is subject to limitations such as natural hazards.

Secondly, it is not critical that people live near “significant urban centres”. These centres are places that most people go to occasionally rather than on a regular basis. The most frequent shopping is at a supermarket which is often done as part of trip to work or home and some other destination. Therefore there is no logistical reason to only encourage and provide for higher densities in these areas.

Thirdly there are real concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these ‘brownfield’ areas and making this a focus of the Spatial Plan. While intensification of ‘brownfield’ sites and areas may be philosophically appealing, the feasibility of achieving this is unlikely to be possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners reluctance to sell, or sell at reasonable market rates

- Miscalculating infill capacity by failing to properly account for the size, shape, value, access, and location of existing dwellings, utilities and other improvements.
- High cost of redeveloping sites which have existing buildings, utilities and other improvements on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

Additional areas of concern with the proposed approach include:

- Cost efficiency and effectiveness – providing infrastructure and utilities to service the level of intensification anticipated.
- Detrimental effects on amenity effects for those areas subject to infill and intensification, and associated adverse effects on people’s well-being and lifestyle, especially in cases where intensification is carried out in an ad-hoc and piecemeal way, as seems most likely.
- The Spatial Plan does not show future growth areas beyond the 2050 timeframe (see Map 2) and relies solely on infill and development of greenfield areas currently being considered by Council plan changes and District plan reviews. This implies that all future growth to accommodate an extra 300,000 population beyond the 2050 population of 700,000 will be through intensification into existing urban areas. This is at odds with Policy 1 of the NPS-UD which require that:

Planning decisions contribute to well-functioning urban environment, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

The Spatial Plan is also at odds with Central Government’s Urban Growth Agenda which is “to improve housing affordability by removing barriers to the supply of land and infrastructure and making room for cities to grow up as well as out.” This agenda clearly anticipates providing for growth both out and up, whereas the Spatial Plan predominantly provides only for upward development, especially beyond 2050. Greenfield development is largely ignored in the Spatial Plan despite its proven role in providing for housing within Greater Christchurch. The high number of new houses achieved in recent years by way of greenfield development has occurred for a number of reasons, the most significant of which is that large blocks of land are only available outside existing urban areas. These blocks can and have enabled a large number of new sections and houses to be efficiently created in a relatively short time frame. This has resulted in a variety of housing options being available in well-designed, accessible developments.

Additionally, caution must be applied to the notion that greenfield development is the antithesis of intensification and is therefore not a preferred source of housing supply. Greenfield development can deliver higher housing densities which typically create more optimal outcomes than brownfield intensification. The ability of greenfield development to masterplan and deliver density which includes amenity such as greenspace and community space along with provision for public transport services and sustainable and efficient infrastructure far surpasses the ability for similar outcomes to be achieved in brownfield setting.

The draft Natural and Built Environment Bill, and associated draft Spatial Planning Bill reinforces and builds on the Urban Growth Agenda's requirement to provide for housing choice, as set out in Clause 5 – System outcomes, of the NBE Bill:

To assist in achieving the purpose of this Act, the national planning framework and all plans must provide for the following system outcomes:

(a) ...

(b) ...

(c) well functioning urban and rural areas that are responsive to the diverse and changing needs of people and communities in a way that promotes—

(i) the use and development of land for a variety of activities, including for housing, business use, and primary production; and

(ii) the ample supply of land for development, to avoid inflated urban land prices; and

(ii) housing choice and affordability; and

(ii) an adaptable and resilient urban form with good accessibility for people and communities to social, economic, and cultural opportunities; and

(d) ...

(e) ...

Clause 3 of the Spatial Planning Bill sets out that Regional Spatial Strategies are to assist in achieving the system outcomes established in the NBE Bill.

A Spatial Plan that emphasises infill without regard to other housing types, and making provision for an ample supply of land would appear to be at odds with the direction of the urban growth agenda, and risks inflating urban land prices and limiting housing choice for the community.

2.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

✓ Yes

Reasons

A healthy natural environment is intrinsically linked with the wellbeing of people and places. It is important to work with nature when considering development for the future, especially in a time of increased risk from the effects of climate change induced weather events and potential sea level rise. Any proposal to protect, maintain and enhance the natural environment in urban areas needs to be based on sound evidence and on a case-by-case basis.

2.4 Do you support the concept of a Greenbelt around our urban areas?

✓ Unsure

Reasons

It is not clear what the future use of land between the Green Belt and Existing urban area is intended to be. Whilst the concept of a Green Belt is not opposed in principle, there appears to be little thought put into its identification and application. Currently the Green Belt appears to critical area of land that may be the most practical and efficient location for growth, particularly those areas of land between Prebbleton, Lincoln and Rolleston, but also to the west of Christchurch between West Melton and Templeton. In its current form the Green Belt potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan and has the potential to lead to perverse outcomes in terms of future urban growth and development. In addition, large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan.

A policy framework that achieves the same outcomes described by the draft Spatial Plan (an area where there is a dominance of open space for nature, rural production, and recreation. A green belt can be used to provide a large, connected area of natural environment spaces and to limit urban expansion.), but which does not rely on such a blunt instrument as a green belt, will achieve better outcomes and should be sufficient to:

- Provide for open space for nature and recreation

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

2.5 Priority Development Areas: Do you agree with the approach to focus on these areas?

✓ In Part

Reasons

In principle we support the concept of Priority Development Areas (PDA) and look forward to working in partnership with the relevant Territorial Authorities and Government agencies to unlock opportunities in these areas.

However, it is unclear what the focus of the various PDAs is intended to be and in what sequence (i.e. which PDA has priority?), over what timeframes, which priority areas will be and if for more intensive residential development by way of infill, the extent to which this is feasible. As noted above, while intensification of existing urban areas may appear viable, the feasibility of achieving this is often not possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners' reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, utilities and other improvements.
- High cost of redeveloping sites which have existing buildings, utilities, and other improvements on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

2.6 The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. Do you agree with the draft spatial strategy outlined above?

✓Partially

Reasons

Opportunity	Direction	Support/Oppose
<p>1. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places</p>	<p>1.1 Avoid urban development over Wāhi Tapu</p> <p>1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and on regional and site-specific characteristics.</p>
<p>2. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change</p>	<p>2.1 Focus and incentivise growth in areas free from significant risks from natural hazards</p> <p>2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and site-specific characteristics.</p> <p>We also consider that, based on the information provided in the Spatial Plan, that the estimation of risk from climate change is overly optimistic given the timeframe of the Spatial Plan. Managed retreat should be discussed in detail and provided for.</p>

<p>3. Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people</p>	<p>3.1 Avoid development in areas with significant natural values 3.2 Prioritise the health and wellbeing of water bodies</p> <p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>Support Directions 3.1 and 3.2 subject to any actions associated with this Direction being based on a sound evidential basis and on site specific characteristics.</p> <p>Support in part. This is most realistically achieved in well designed greenfield areas. It is difficult to see that this is able to be achieved in brownfield development areas, which is likely to result in less than optimal social, cultural and environmental outcomes.</p> <p>Support, subject to any actions associated with this Direction being based on a sound evidential basis and on site specific characteristics.</p> <p>Oppose, for the reasons set out in Section 2.4</p>
<p>4. Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs</p>	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services;</p>	<p>Support</p>

	<p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p> <p>4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>Support in part. Amend as follows: 'Ensure <u>at least</u> sufficient ...' to align with Central Governments Urban Growth Agenda</p> <p>Support in part, for the reasons set out in Section 2.2 and section 2.5 In addition, it is not clear what incentives will be provided and how realistic this Direction will be in terms of implementation</p> <p>Support in part, for the reasons set out in Section 2.2</p> <p>Support in part. This direction seem unrealistic as it largely depends on economics and attitudes. In addition, it is not clear that thriving neighbourhoods with quality developments and supporting community infrastructure is realistic in brownfield intensification areas</p>
<p>5. Provide space for businesses and the economy to prosper in a low carbon future</p>	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network</p>	<p>Support</p>

	<p>5.2 A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services</p> <p>5.3 Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy</p>	<p>Oppose in part. It is not clear what this direction is seeking and whether this Direction is required.</p> <p>Support in part. The current Christchurch International Airport noise contours are out of date and need to be updated using the Annual Average Noise Contours recently developed, by CIAL, and peer reviewed by Environment Canterbury. The Spatial Plan needs to use the updated noise contours to inform future planning processes and decision making.</p>
<p>6. Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities</p>	<p>6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility</p> <p>6.2 Significantly improve public transport connections between key centres</p> <p>6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga</p> <p>6.4 Develop innovative measures to encourage people to change their travel behaviours</p>	<p>Support</p> <p>Support, for the reasons set out in Section 2.1</p> <p>Support</p> <p>Support</p>

	6.5 Maintain and protect connected freight network	Support
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And for the reasons set out in Sections 2.1 – 2.5, and in Section 2.7

2.7 Do you have any feedback on other aspects of the Draft Spatial Plan

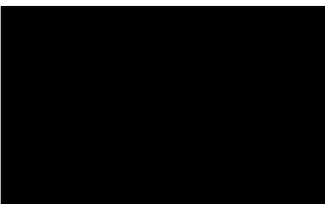
The Spatial Plan recognises that it will be necessary to incentivise higher density residential living. The previous and now current Christchurch District Plan have provided for higher densities. While there had been some demand for this housing typology, recent experience indicates that demand is now tailing off. This indicates that unless there are significant incentives that the desired increase in density will not occur. It is not sufficient to enable this development. This is recognised in Direction 4.3 but no examples of this critical component for densification are provided or discussed.

We agree that focusing growth away from hazardous locations and investing in infrastructure that reduces exposure and adapting urban areas by incorporating functional elements into the blue-green network can all help to reduce some of the risks. However, we note there does not appear to be any discussion or initiatives that considers managed retreat of existing development that is vulnerable with the next 30 years.

Further clarity on implementation and delivery of the Spatial Plan is required. As currently drafted the implementation and delivery is vague and uncertain and it is not clear how each supporting agency will be involved and who is providing leadership on various initiatives, and where there is a coordinating agency in charge of implementation. It is equally uncertain how the development community will be able to take advantage of opportunities to partner with territorial authorities, the Greater Christchurch Partnership and Government Agencies on relevant initiatives.

3. Hearing options

We confirm that we do wish to be heard in support of our submission.



23 July 2023

Signature of person authorised to sign on behalf of submitter

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Andrew **Last name:** Mactier

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Hughes Developments Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

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Attached Documents

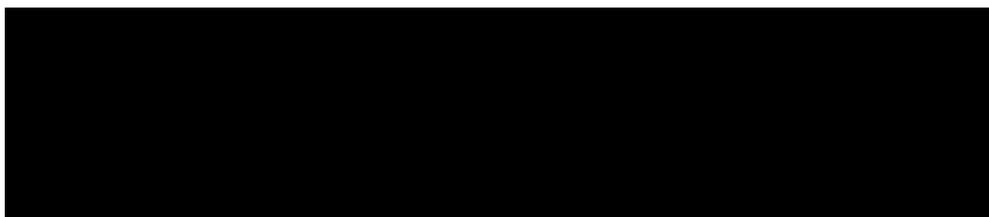
File
Hughes Developments Ltd Submission on the Draft Greater Christchurch Spatial Plan

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: Greater Christchurch Partnership
huihuimai@greaterchristchurch.org.nz

1. Submitter Details

Submitters name: Hughes Developments Limited



2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan). We commend the Greater Christchurch Partnership in commencing the development of a Future Development Strategy for the Greater Christchurch area that provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future.

Details of our submission on the Spatial Plan are set out below.

2.1 Do you support the improved public transport system proposed in the draft Spatial Plan?

Partially

Reasons

We support the improvements to the public transport system in principle, but it is not clear that the delivery of the Mass Rapid Transit system (MRT) system as proposed is feasible nor affordable and have concerns that any focus on implementing the proposed MRT will come at the cost of not delivering on an improved wider public transport system for the Greater Christchurch area.

The Spatial Plan has a very strong emphasis on a MRT system. Focusing on the proposed MRT should not come at the cost of improving the existing public transport system, particularly the public transport system which does not meet the current needs of the community.

While we recognise that Opportunity 6 of the Spatial Plan seeks to '*prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities*' it is not clear how or when this will be achieved. Delivery of a satisfactory public transport system that meets the current needs of the community in the Greater Christchurch area has been a perennial issue for those agencies responsible for delivering the public transport system. Much of the Spatial Plan's direction is predicated on increased residential densities to provide a critical mass to support public transport. Aside from MRT, there is little clarity on how public transport services will align with greater housing density.

The current public transport system does not adequately serve existing urban areas with a service that meets the needs of the community and there do not appear to be any plans to improve, or even provide public transport into recently developed urban areas, areas which are currently being considered for rezoning for urban expansion in parts of Greater Christchurch, or to service areas which are signalled for further intensification through the Spatial Plan and subsequent processes. This is particularly evident in areas of Selwyn where there has been strong growth in recent years, such as Rolleston, Lincoln and Prebbleton. This will no doubt be a prevalent issue across many other parts of the Greater Christchurch area also.

Given the above it is difficult to be confident that the transformational shift in transport choice, from private motor vehicle to public transport, as articulated and envisioned by the Spatial Plan is achievable and that the anticipated reduction in carbon emissions will transpire as intended.

And for any other applicable reasons set out in Section 2.7

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

✓ No

Reasons

Encouraging and providing for future development should not be limited to areas around the “significant urban centres” and “core public transport routes” shown on Map 2. The Spatial Plan has an overly Christchurch City centric approach to providing for future growth, almost to the point of consciously excluding areas in Selwyn and Waimakariri Districts which, based on the constraints mapping and other information provided in the Spatial Plan appear equally suitable for future growth. A broader approach for future development throughout Greater Christchurch is required for the reasons addressed below.

Firstly, due to the large number of additional dwellings and associated services that will be required over the next 30 years and beyond it is important to enable denser development throughout Greater Christchurch and not just focusing on Christchurch City, subject to avoiding land which has important values or is subject to limitations such as natural hazards.

Secondly, it is not critical that people live near “significant urban centres”. These centres are places that most people go to occasionally rather than on a regular basis. The most frequent shopping is at a supermarket which is often done as part of trip to work or home and some other destination. Therefore there is no logistical reason to only encourage and provide for higher densities in these areas.

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- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners reluctance to sell, or sell at reasonable market rates

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- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn¹ and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

Additional areas of concern with the proposed approach include:

- Cost efficiency and effectiveness – providing infrastructure and utilities to service the level of intensification anticipated.
- Detrimental effects on amenity effects for those areas subject to infill and intensification, and associated adverse effects on people’s well-being and lifestyle, especially in cases where intensification is carried out in an ad-hoc and piecemeal way, as seems most likely.
- The Spatial Plan does not show future growth areas beyond the 2050 timeframe (see Map 2) and relies solely on infill and development of greenfield areas currently being considered by Council plan changes and District plan reviews. This implies that all future growth to accommodate an extra 300,000 population beyond the 2050 population of 700,000 will be through intensification into existing urban areas. This is at odds with Policy 1 of the NPS-UD which require that:

Planning decisions contribute to well-functioning urban environment, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

¹ Recent analysis of consent data reveals a clear and overwhelming preference for stand-alone houses in the Selwyn District, which are unlikely to change materially over the short to medium term.

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

It is also at odds with Central Government's Urban Growth Agenda which is "to improve housing affordability by removing barriers to the supply of land and infrastructure and making room for cities to grow up as well as out." This agenda clearly anticipates providing for growth both out and up, whereas the Spatial Plan predominantly provides only for upward development, especially beyond 2050. Greenfield development is largely ignored in the Spatial Plan despite its proven role in providing for housing within Greater Christchurch. The high number of new houses achieved in recent years by way of greenfield development has occurred for a number of reasons, the most significant of which is that large blocks of land are only available outside existing urban areas. These blocks can and have enabled a large number of new sections and houses to be efficiently created in a relatively short time frame. This has resulted in a variety of housing options being available in well-designed, accessible developments.

Additionally, caution must be applied to the notion that greenfield development is the antithesis of intensification and is therefore not a preferred source of housing supply. Greenfield development can deliver higher housing densities which typically create more optimal outcomes than brownfield intensification. The ability of greenfield development to masterplan and deliver density which includes amenity such as greenspace and community space along with provision for public transport services and sustainable and efficient infrastructure far surpasses the ability for similar outcomes to be achieved in brownfield settings.

The draft Natural and Built Environment Bill, and associated draft Spatial Planning Bill reinforces and builds on the Urban Growth Agenda's requirement to provide for housing choice, as set out in Clause 5 – System outcomes, of the NBE Bill:

To assist in achieving the purpose of this Act, the national planning framework and all plans must provide for the following system outcomes:

(a) ...

(b) ...

(c) well functioning urban and rural areas that are responsive to the diverse and changing needs of people and communities in a way that promotes—

(i) the use and development of land for a variety of activities, including for housing, business use, and primary production; and

(ii) the ample supply of land for development, to avoid inflated urban land prices; and

(ii) housing choice and affordability; and

(ii) an adaptable and resilient urban form with good accessibility for people and communities to social, economic, and cultural opportunities; and

(d) ...

(e) ...

Clause 3 of the Spatial Planning Bill sets out that Regional Spatial Strategies are to assist in achieving the system outcomes established in the NBE Bill.

A Spatial Plan that emphasises infill without regard to other housing types, and making provision for an ample supply of land would appear to be at odds with the direction of the urban growth agenda, and risks inflating urban land prices and limiting housing choice for the community.

And for any other applicable reasons set out in Section 2.7

2.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

✓ Yes

Reasons

A healthy natural environment is intrinsically linked with the wellbeing of people and places. It is important to work with nature when considering development for the future, especially in a time of increased risk from the effects of climate change induced weather events and potential sea level rise. Any proposal to protect, maintain and enhance the natural environment in urban areas needs to be based on sound evidence and on a case-by-case basis.

2.4 Do you support the concept of a Greenbelt around our urban areas?

✓ No

Reasons

It is not clear what the future use of land between the Green Belt and Existing urban area is intended to be. Whilst the concept of a Green Belt is not opposed in principle, there appears to be little thought put into its identification and application. Currently the Green Belt appears to capture critical areas of land that may be the most practical and efficient location for growth, particularly those areas of land between Prebbleton, Lincoln and Rolleston, but also to the west of Christchurch between West Melton and Templeton. In its current form the Green Belt potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan and has the potential to lead to perverse outcomes in terms of future urban growth and development. In addition, large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan.

A policy framework that achieves the same outcomes described by the draft Spatial Plan (an area where there is a dominance of open space for nature, rural production, and recreation. A green belt can be used to provide a large, connected area of natural environment spaces and to limit urban expansion.), but which does not rely on such a blunt instrument as a green belt, will achieve better outcomes and should be sufficient to:

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

And for any other applicable reasons set out in Section 2.7

2.5 Priority Development Areas: Do you agree with the approach to focus on these areas?

✓ Partially

Reasons

In principle we support the concept of Priority Development Areas (PDA) and look forward to working in partnership with the relevant Territorial Authorities and Government agencies to unlock opportunities in these areas.

However, it is unclear what the focus of the various PDAs is intended to be and in what sequence (i.e. which PDA has priority?), over what timeframes, which priority areas will be and if for more intensive residential development by way of infill, the extent to which this is feasible. As noted above, while intensification of existing urban areas may appear viable, the feasibility of achieving this is often not possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners' reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, utilities and other improvements.
- High cost of redeveloping sites which have existing buildings, utilities, and other improvements on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased

dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

2.6 The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. Do you agree with the draft spatial strategy outlined above?

✓Partially

Reasons

Opportunity	Direction	Support/Oppose
<p>1. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places</p>	<p>1.1 Avoid urban development over Wāhi Tapu</p> <p>1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and on regional and site specific characteristics.</p>
<p>2. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change</p>	<p>2.1 Focus and incentivise growth in areas free from significant risks from natural hazards</p> <p>2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and site specific characteristics.</p> <p>We also consider that, based on the information provided in the Spatial Plan, that the estimation of risk from climate change is overly optimistic given the timeframe of the Spatial Plan. Managed retreat should be discussed in detail and provided for.</p>

<p>3. Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people</p>	<p>3.1 Avoid development in areas with significant natural values</p> <p>3.2 Prioritise the health and wellbeing of water bodies</p> <p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production.</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>Support Directions 3.1 and 3.2 subject to any actions associated with this Direction being based on a sound evidential basis and on-site specific characteristics.</p> <p>Support in part. This is most realistically achieved in well designed greenfield areas. It is difficult to see that this can be achieved in brownfield development areas, which is likely to result in less than optimal social, cultural and environmental outcomes.</p> <p>Support, subject to any actions associated with this Direction being based on a sound evidential basis and on site specific characteristics.</p> <p>Oppose, for the reasons set out in Section 2.4</p>
<p>4. Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs</p>	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services.</p>	<p>Support</p> <p>Support in part. Amend as follows:</p>

	<p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p> <p>4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>‘Ensure <u>at least</u> sufficient ...’ to align with Central Governments Urban Growth Agenda</p> <p>Support in part, for the reasons set out in Section 2.2 and section 2.5 In addition, it is not clear what incentives will be provided and how realistic this Direction will be in terms of implementation</p> <p>Support in part, for the reasons set out in Section 2.2</p> <p>Support in part. This direction seems unrealistic as it largely depends on economics and attitudes. In addition, it is not clear that thriving neighbourhoods with quality developments and supporting community infrastructure is realistic in brownfield intensification areas</p>
<p>5. Provide space for businesses and the economy to prosper in a low carbon future</p>	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network</p> <p>5.2 A well connected centres network that strengthens Greater Christchurch’s economic competitiveness and</p>	<p>Support</p> <p>Oppose in part. It is not clear what this direction is seeking</p>

	<p>performance, leverages economic assets, and provides people with easy access to employment and services</p> <p>5.3 Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy</p>	<p>and whether this Direction is required.</p> <p>Support in part. The current Christchurch International Airport noise contours are out of date and need to be updated using the Annual Average Noise Contours recently developed, by CIAL, and peer reviewed by Environment Canterbury. The Spatial Plan needs to use the updated noise contours to inform future planning processes and decision making.</p>
<p>6. Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities</p>	<p>6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility</p> <p>6.2 Significantly improve public transport connections between key centres</p> <p>6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga</p> <p>6.4 Develop innovative measures to encourage people to change their travel behaviours</p> <p>6.5 Maintain and protect connected freight network</p>	<p>Support</p> <p>Support, for the reasons set out in Section 2.1</p> <p>Support</p> <p>Support</p> <p>Support</p>

And for the reasons set out in Sections 2.1 – 2.5, and in Section 2.7

2.7 Do you have any feedback on other aspects of the Draft Spatial Plan

The Spatial Plan recognises that it will be necessary to incentivise higher density residential living. The previous and now current Christchurch District Plan have provided for higher densities. While there had been some demand for this housing typology, recent experience indicates that demand is now tailing off. This indicates that unless there are significant incentives that the desired increase in density will not occur. It is not sufficient to enable this development. This is recognised in Direction 4.3 but no examples of this critical component for densification are provided or discussed.

We agree that focusing growth away from hazardous locations and investing in infrastructure that reduces exposure and adapting urban areas by incorporating functional elements into the blue-green network can all help to reduce some of the risks. However, we note there does not appear to be any discussion or initiatives that considers managed retreat of existing development that is vulnerable with the next 30 years.

The Network of Urban and Town Centres needs revisiting to recognise that Rolleston and Rangiora are both Significant Urban centres in their own right. There is no value in differentiating them as Major towns. It is also concerning to read that some of the network of urban centres will not be the focus for significant growth in the future. It is not clear which urban centres will be prioritised and which will not.

Further clarity on implementation and delivery of the Spatial Plan is required. As currently drafted the implementation and delivery is vague and uncertain and it is not clear how each supporting agency will be involved and who is providing leadership on various initiatives, and where there is a coordinating agency in charge of implementation. It is equally uncertain how the development community will be able to take advantage of opportunities to partner with territorial authorities, the Greater Christchurch Partnership and Government Agencies on relevant initiatives.

There are several conflicting priorities which need resolving, including the desire to reduce carbon emissions, but with limited public transport to aid in achieving this. This is a particular issue in recent areas of strong growth, such as Rolleston, Lincoln and Prebbleton, but is also prevalent in other parts of Greater Christchurch. In addition, the Significant Urban Centres approach directs travel to these locations but there is a lack of public transport. This is likely to result in increased use of private motor vehicles.

3. Hearing options

We confirm that we do wish to be heard in support of our submission.



23 July 2023

Signature of person authorised to sign on behalf of submitter

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Andrew **Last name:** Mactier

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Independent Producers Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

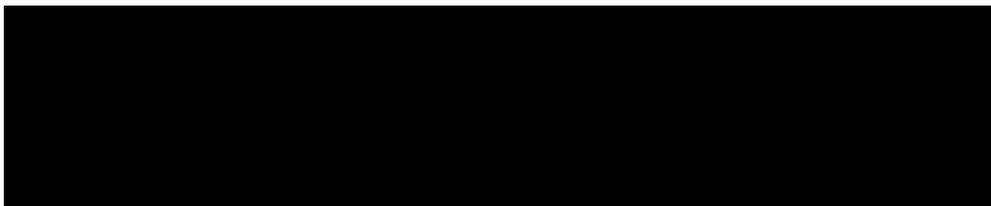
File
Independent Producers Limited DRAFT SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: **Greater Christchurch Partnership**
huihuimai@greaterchristchurch.org.nz

1. Submitter Details

Submitters name: **Independent Producers Limited**



2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan). We commend the Greater Christchurch Partnership in commencing the development of a Future Development Strategy for the Greater Christchurch area that provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future.

The specific nature of our submission relates to the protection of strategic infrastructure as detailed throughout the Spatial Plan, in particular Christchurch international Airport and its associated noise control contours.

The Spatial Plan includes various maps which show airport noise contours that are currently identified in the operative and proposed District Plans for the Selwyn and Waimakariri Districts, and the operative Christchurch District Plan. These planning instruments show both a 55dBA and 50dBA noise contour.

Recent modelling carried out on behalf of Christchurch International Airport Limited (CIAL) has developed new noise contours using updated modelling technology. The modelling created two sets of new noise contours: the Outer Envelope Contours (OEC) and the Annual Average Noise Contours (AANC). The CIAL modelling has been peer reviewed by an independent group of experts convened by Environment Canterbury.

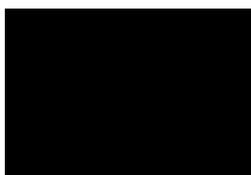
Notwithstanding concerns we have about the noise contour modelling and associated peer review adopting the ultimate capacity of airport operations approach, and the unreliability of any robust growth and population projections, we consider that the Spatial Plan should, subject to the matters addressed further in this submission, use these most recent peer reviewed noise contours as the basis for informing any future land use planning processes and decision making, rather than relying on the outdated contours currently shown in the Spatial Plan. We further contend that any noise contours used for planning purposes should rely on the AANC rather than the OEC. This is based on advice from Environment Canterbury's Independent Peer Review Panel to the effect that the OEC is a theoretical contour only and that application of the AANC is consistent with global best practice.

Further to the points noted above, we consider that use of only the 55dBA is the most appropriate contour for land use planning purposes rather than the 50dBA contour. Findings in the Environment Court confirm that if the contour were set at 55dBA it is unlikely there would be any prospect of a curfew for airport operations, so reliance of a 50dBN contour is not required. Furthermore, CIAL's noise experts (Marshall Day) have consistently advised in respect of all other airports in New Zealand that reliance on the 55 dBA contour, rather than a 50dBA contour, is considered sufficient at providing a reasonable level of amenity.

In the event that the Spatial Plan's Hearings Panel do consider that the 50dBA is required to manage effects, then any proposed planning regime should not be based on an avoidance policy as is the current approach, rather it should seek to manage development to ensure the protection of amenity through appropriate building design.

3. Hearing options

We confirm that we do wish to be heard in support of our submission.



23 July 2023

Signature of person authorised to sign on behalf of submitter

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Lynda **Last name:** Murchison

If you are responding on behalf of a recognised organisation, please provide the organisation name:

NZ Pork

Your role in the organisation and the number of people your organisation represents:

Senior Environmental Advisor for Chief Executive

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
NZ Pork - Submission on draft Greater Christchurch Spatial Plan

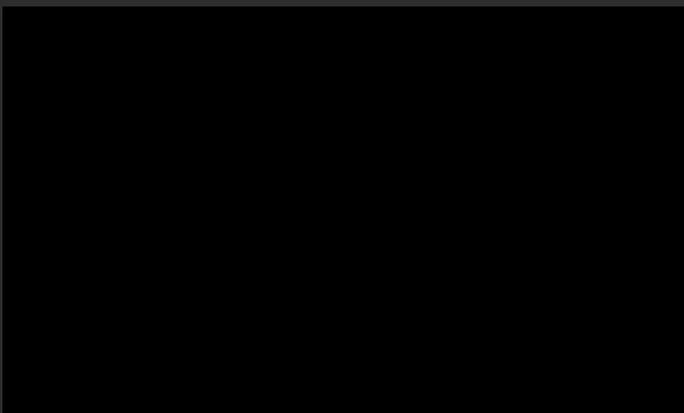
NZ PORK



Submission to: Urban Growth Partnership for Greater Christchurch

On: **Draft Greater Christchurch Spatial Plan**

Date: 23rd July 2023



1. Introduction

- 1.1 The New Zealand Pork Industry Board (NZPork) thanks the Urban Growth Partnership for Greater Christchurch for the opportunity to comment on the consultation draft of a Spatial Plan for Greater Christchurch.
- 1.2 Commercial pig farming is a niche industry in New Zealand, but an important part of rural Canterbury including within the Greater Christchurch area. Pig farming is not well known or understood, so is often overlooked in both national and local government policy and planning documents. Therefore, this submission starts by providing some background information about NZPork and pig farming, before discussing the following topics:
 - The role of primary production in the Christchurch/Canterbury economy
 - The impact of urban growth on rural land uses generally, and pork production in particular
 - The need to include rural land use in the spatial plan for Greater Christchurch
 - Status of the spatial plan

2. Summary

- 2.1 Primary production drives both Christchurch and the wider Canterbury economy. The climate and geography of Canterbury lends itself to many forms of primary production including pig farming, and most notably outdoor pig farming, which does not occur in many places, globally. Pigs are monogastric so emit low biogenic methane emissions compared with ruminants. As such, we submit pig farming has an important potential role in a low emissions farming economy.
- 2.2 NZPork supports the need for spatial planning generally, and within the Greater Christchurch area. We support the focus in the draft spatial plan on providing for urban growth through a combination of increasing urban density and expansion around existing urban hubs, in preference to indiscriminate lower density residential expansion and rural lifestyle development. We support the recognition in the draft plan of the need to protect highly productive land and the value of Green Belts.
- 2.3 While we understand the focus is on urban growth, the Greater Christchurch area also encompasses a significant area of rural land and associated land uses, including approximately 15 commercial piggeries. Urban growth impacts on rural land uses in multiple ways and protection of highly productive soil from residential development is only part of the issue. Farming generally, and pig farming in particular, is compromised by residential and rural lifestyle expansion in close proximity.
- 2.4 We submit that a spatial plan for Greater Christchurch needs to recognise and manage impacts of urban growth on rural land uses; and ensure rural activities and rural communities within the Greater Christchurch area can not only continue but expand and change.
- 2.5 We also submit that the Greater Christchurch Urban Partners should uphold the directions of this draft spatial plan in their own regional and district plans; otherwise, what is the point?

3. NZPork

- 3.1 The New Zealand Pork Industry Board is a statutory board established under the Pork Industry Board Act 1997. The Board is funded by compulsory levies paid by pig farmers.



- 3.2 The object of the Board is to help attain the best possible net on-going returns for New Zealand pigs, pork products and co-products, and to support the pork industry to make the best possible on-going contribution to the New Zealand economy.
- 3.3 An essential part of attaining these objectives is ensuring pig farming meets or exceeds expectations around environmental and social responsibility; which includes contributing to the collective goal to reduce New Zealand and hopefully global greenhouse gas (GHG) emissions, while ensuring people have access to high quality and affordable animal protein.

4. Commercial Pig Farming in Canterbury

- 4.1 Commercial pig farming in New Zealand is small by international standards, with 93 commercial (levy-paying) pork producers in 2021. These farmers produce approximately 632 153 pigs annually, with a rolling four-year average value of \$178m (2018-2021). Ninety-five percent of our farmers have NZPork Pigcare Accreditation.
- 4.2 Canterbury is the pork producing capital of New Zealand: 63% of piggeries registered with NZPork are located within Canterbury; 15 of those within the greater Christchurch area at Yaldhurst, West Melton, Rolleston, Kaiapoi, Eyreton, Rangiora and Banks Peninsula. Another four farms are located outside but close to the Greater Christchurch boundary.
- 4.3 In New Zealand, pigs are farmed using a spectrum of models from intensive indoor farming systems to outdoor free-farmed and free-range systems. Some pig farmers specialise in pork production only, while others farmers farm pigs in conjunction with sheep and beef, arable and dairy farming, horticulture and viticulture.
- 4.4 Outdoor pork production requires flat land, low rainfall and free draining soils, so most outdoor pig farms are situated in Canterbury. New Zealand is one of few countries with a suitable climate for year-round outdoor or free-range pig farming; Canterbury's outdoor pig farms are rare, globally.
- 4.5 Annual pork consumption per capita in New Zealand is around 23kg and is projected to increase by 0.8kg per capita year-on-year to 2031. Currently, only 40% of pork products consumed in New Zealand are sourced domestically; the balance is imported pork product (largely as cured meats). However, New Zealand pork producers form an integral part of the rural economy: they utilise other farming resources such as grains for feed, provide a source of organic fertiliser which is high in nitrogen, potassium and phosphorous, and provide employment.
- 4.6 Pig farming potentially has an important role in lower emissions farming systems in New Zealand. Pigs are monogastric, meaning they do not produce biogenic methane emissions on the same scale as ruminant livestock (cattle, sheep, deer and goats). Pig farming makes up less than 0.2% of New Zealand's agricultural emissions (mostly from pig effluent) and NZPork has a very achievable goal of having all pig farms carbon neutral by 2050 (www.nzpork.co.nz). Therefore, pig farming is potentially an option in mixed farming systems for farmers wanting to reduce their biogenic methane emissions without losing production.



- 4.7 Pigs require concentrated, highly specialised diets for optimal nutrition and pig farmers rely on a combination of grains, grazing (in outdoor situations) and supplementary feeds, including food waste. Traditionally, dairy farmers kept pigs as part of a complementary farming system, feeding them on milk by-products. While that practice no longer occurs, the principle of synthesised or mixed farming to efficiently utilise feed and minimise waste (including GHG emissions) remains valid.
- 4.8 Food waste is estimated to contribute around 9% of New Zealand biogenic methane emissions (www.environment.govt.nz). The potential of pig farming in the reduction of food waste has been recognised by the Office of the Prime Minister's Chief Science Advisor in the project, 'Food resource, food waste' (www.pmsca.ac.nz). This project started in April 2022 and to date has produced two reports. This year, subject to confirmation from the Prime Minister, the plan is to produce and publish two further substantive reports:
- Report 3 – exploring options for capturing value from food waste which isn't prevented or rescued, such as upcycling, **conversion to animal feed**, composting, and anaerobic digestion [emphasis added]
 - Report 4 – focusing on food waste prevention at all stages of the food supply chain, from primary production through to consumer food waste prevention.

5. Role of Primary Production in the Christchurch/Canterbury Economy

- 5.1 Urban growth is a by-product of economic growth. Economists recognise a direct relationship between productivity and personal income. High productivity is also associated with life expectancy, health outcomes, education measures and living standards (Feiger & Dyason, 2019, p.7). NZPork submits that it is vital any spatial plan for urban growth in the Greater Christchurch Area recognises and enables the forces that drive the Christchurch/Canterbury economy.
- 5.2 Canterbury is well endowed with natural resources to support primary production: 60% of the land area is cultivatable: the climate is dry and benign; there is access to high quality, plentiful water resources (though storage is needed); and good transport infrastructure (Saunders & Saunders, 2012, p.2). Canterbury has 21% of New Zealand's Land Use Capability Class 1-3 soils and 19% of New Zealand's total farmed area (Ibid, p.2). Agriculture comprised 6.7% of Canterbury's GDP in 2020 compared with 4.3% for the nation as a whole (Canterbury Mayoral Forum, 2022).
- 5.3 ChristchurchNZ commissioned three reports in 2019 on the drivers of the Christchurch and wider Canterbury economy. Those reports found that agriculture is the main driver of the Christchurch/Canterbury economy alongside manufacturing – of which primary manufacturing comprises 64%, and tourism (pre Covid-19). Construction was also a major growth industry in Christchurch from 2014, through by 2017 that growth had peaked (Ibid, p.14). Agriculture and manufacturing were responsible for 32% of employment in 2019, followed by construction at 9.8% and retail at 9.6% (Feiger & Dyson, 2019b, p.14).
- 5.4 Feiger & Dyason (2019b, p.3) observed, "The value chain benefit of agriculture is a standout feature for the rest of Canterbury, supporting industries such as manufacturing and transport. The development of strategic and policy directions ought to consider the important role of agriculture and other growing industries in the region to encourage economic growth and development."



NZ PORK

- 5.5 While little primary production occurs within Christchurch City's urban area, the sub-industries which dominate the Christchurch economy are aligned with performance in the major industries of primary production and primary manufacturing. For example, exports from the Ports of Christchurch (CIAL) and Lyttleton were estimated to be \$7.1bn in 2018, increasing to \$8.8bn if Timaru is also included; being 24.7% of Canterbury's GDP (Feiger & Dyason, 2019a, p.10).
- 5.6 "The strong agricultural economy of Canterbury supports growth and development in the rest of the economy due to its forward and backward linkages with manufacturing and transport providing good examples of how the growing agricultural industry creates opportunities for other industries to prosper" (Feiger & Dyason, 2019b, p.16).

6. Impact of Urban Growth on Rural Land Uses and Pork Production

- 6.1 Urban expansion does not occur on a blank canvass. It encroaches into and impacts on rural land uses and rural communities. Some of these effects can be positive, bringing new people and amenities into rural areas. However, there are also adverse effects of urban growth on rural areas, which are well-documented in planning literature.
- 6.2 The loss of highly productive soils for food production has been recognised in the National Policy Statement for Highly Productive Land 2022 and in this draft spatial plan. The impact of the loss of good quality soils for farming purposes is not limited to the ability to grow fruit and vegetables, however. The geography of the Canterbury Plains means that, generally speaking, moving east to west soils become lighter, stonier and more free-draining. Farming on such soils requires more inputs, such as fertiliser and irrigation water, to obtain the same level production as on good quality soils. This effects not only the cost of production but the environmental footprint of farming. This correlation between urban growth and the environmental impacts of rural land uses, is not one well-recognised in land use planning in Canterbury.
- 6.3 The loss of productive soils is not the only effect of urban growth on rural land uses. Other examples include:
- Reverse-sensitivity effects with odour, dust, seasonal activities such as the use of bird scarers and frost fans, spraying, stubble burning, and animals roaring
 - More traffic on rural roads and conflicts with other road users such as stock (droving) and farm machinery
 - Increased pressure on restricted rural water supplies
 - Reduced pest management
 - Increased land values which increases rates.
- 6.4 Pig farming is particularly sensitive to reverse-sensitivity effects from residential and rural lifestyle encroachment. Pigs natural body odour is quite strong and people can find it offensive; resulting in misperceptions of pigs or pig farms as 'dirty.' The odour from pig effluent is also stronger than other animal effluent and will vary depending on pig diet and effluent treatment systems. Irrespective of whether they are farmed indoors or outdoors, pigs require separation distances from residential and rural-residential activities.
- 6.5 Outdoor pig farms require good but free-draining soils. Indoor pig farms need to locate in proximity to good soils on which farmers can spread pig slurry or effluent, which is usually provided as fertiliser to



other farmers. For example, an indoor pig farm with 400 sows will produce 10680 L/day of effluent. Assuming an average concentration of 0.01% nitrogen, this equates to 32000 kg/N/yr. With a maximum application rate of 200kgN/ha/yr, the farmer will need 195ha of land to spread effluent. The same land area may be used 3-4 times per year, depending on soil type, weather events and the receiving farmer's fertiliser requirements.

- 6.6 Reverse-sensitivity effects from pig farming are not hypothetical. At the time of writing, NZPork is assisting two farmers within the Greater Christchurch area with on-going reverse sensitivity issues, in Selwyn and Waimakariri Districts, respectively.
- 6.7 In the first example, the pig farm is an intergenerational farm operating for over 50 years. In 2021, a resident moved into a lifestyle property nearby and within 12 months had made over 100 complaints to Environment Canterbury about odour from the pig farm. In all but one instance, Environment Canterbury compliance officers found no issue. Earlier this year, the complainant sold their property and proceeded to buy another property even closer to the pig farm. (That property is now on the market.)
- 6.8 In the other example, in 2005 owners of an established pig farm opposed an application for a non-complying subdivision of land adjoining the land they lease to spread effluent. The subdivision application was declined by the Council but granted by the Environment Court by way of a consent order. The consent order included a requirement for a 'no complaint' covenant to be registered on each Title formed by the subdivision, which is binding on all subsequent owners. The covenant prevents the landholders from complaining about the pig farm or enticing others to complain. In 2017, one of the properties was on-sold and since then Environment Canterbury has received multiple complaints about odour from the pig farm. In all instances to date, Environment Canterbury compliance officers have found no odour issue. The complainant is now circulating leaflets among adjoining property owners encouraging them to complain. Because Environment Canterbury treats all complaints as anonymous, the pig farm owners are having difficulty being able to enforce the land use covenant.

7. Support for Spatial Planning Including Rural Land Uses

- 7.1 The potential conflict between urban growth and rural land uses has long been recognised in town and country planning. A cornerstone of the Town and Country Planning Acts 1953 and 1977 was the maintenance of rural land for food production and management of urban sprawl.
- 7.2 The Resource Management Act 1991 is underpinned by neo-liberalist planning approaches which favour the use of market forces to direct land use. For the last 30 years, New Zealand has shied away from spatial or land use planning, with resulting effects on soil, infrastructure, urban design, reverse-sensitivity, and urban growth patterns dependent on road transport using private vehicles.
- 7.3 Reverse-sensitivity effects are dealt with in neo-liberalist planning approaches in one of two ways: either 'buyer beware' or requiring activities to contain any adverse effects within the property boundary. As the examples in section 6 demonstrate, neither approach has proven satisfactory for either the pig farmers involved or the complainants.
- 7.4 NZPork supports the reintroduction of more directive spatial planning to manage urban growth in the Greater Christchurch Area. We also support the direction in the draft spatial plan for urban growth to be



provided through a combination of intensification and expansion around existing urban areas, while avoiding highly productive soils.

- 7.5 We submit, the spatial plan needs to go further a step further. Firstly, other potential effects of urban growth on rural land uses than loss of productive soils need to be recognised and managed, including potential reverse-sensitivity effects. Secondly, we submit that the spatial plan for Greater Christchurch needs to recognise and provide for the rural land uses and communities that exist within the Greater Christchurch Area; and allow for their growth as part of a low emissions economy.
- 7.6 While this is a draft spatial plan produced by the Greater Christchurch **Urban** Partnership (emphasis added) we submit urban growth needs to be understood and managed alongside and within the context of the rural areas it both connects with and impacts upon: they are two sides of the coin.

Amendments to the Plan

- 7.7 NZPork submits that the draft spatial plan be retained as written except for the additions requested below.
- (i) Aspirations for Greater Christchurch (p.14)
- Add a new aspiration that reads: *“Primary production and rural land uses remain key characteristics of the Greater Christchurch Area and enjoy the space and environmental conditions to continue to operate, and to expand or change.”*
- (ii) How Christchurch has Grown (p.19) - the third paragraph of this section acknowledges that farming was the city’s first industry reflecting the pre-eminence of the Waitaha/Canterbury region as a foreign province.
- Add a new paragraph after paragraph three which outlines the on-going significance of farming to the Christchurch/Canterbury economy and the activities which continue to occur within the Greater Christchurch Area. Acknowledge the need for these activities to be able to expand or change in response to new markets and new issues, including transitioning to a lower emissions economy. Note that urban expansion has compromised farming in this area in terms of loss of productive soils and reverse-sensitivity effects and commit to managing urban growth so that these effects do not continue and are not exacerbated.
- (iii) Part 1: Opportunity 3 (p.30)
- Add a new point 3.6 which reads: *“Avoid urban growth or rural lifestyle development in areas that may cause or exacerbate reverse-sensitivity effects with existing rural land uses.”*
 - Add to ‘Key moves’ a new key move: *“Maintain rural land uses and character”*
- (iv) Part 2: Opportunity 5 (p.31)
- Amend Opportunity 5 to read: *“Provide space for businesses, including primary production and other rural land uses, and the economy to prosper in a low carbon future.”*
 - Add a new 5.4 which reads: *“Ensure urban growth occurs in locations and patterns that sustain the natural resources of Canterbury for primary production, including but not limited to productive soils, avoids reverse-sensitivity effects with rural land uses, and does not*



compromise the ability of primary production activities to expand or change, including adapting to a lower emissions economy.”

- (v) Make consequential additions to the remainder of the document to give effect to the amendments requested and themes raised in this submission.

8. Status of the Spatial Plan

- 8.1 The draft spatial plan states (p.21) that it satisfies the requirements of a future urban development strategy under the National Policy Statement on Urban Development. District plans must give effect to any national policy statement under s75(3)(c) of the Resource Management Act 1991 (or s67(3)(c) for regional plans). Figure 5 on p.24 of the document depicts this statutory requirement.
- 8.2 The draft spatial plan also notes at p.21 that while this is a new document it builds upon earlier plans and strategies for Greater Christchurch and, “does not seek a fundamental change from their strategic direction.”
- 8.3 In this context, NZPork questions why the proposed Waimakariri District Plan seeks to rezone nearly one third of its rural area to rural lifestyle, being land within the Greater Christchurch Area. This approach seems inconsistent with the pattern for urban growth in the draft spatial plan. While this is a matter for resolution through submissions and hearings on the proposed Waimakariri District Plan, it does raise a question as to how such a fundamentally different approach can be taken to urban growth in that plan when presumably the same information that was relied upon by the Greater Christchurch Urban Partnership in developing the draft spatial plan would also be available to the Waimakariri District Council as a Partner, for its district plan review?

9. Conclusion

- 9.1 In conclusion, pig farming is an important food production industry now and increasingly as New Zealand shifts to a low emission farming economy. Canterbury is already the pork production capital of New Zealand and one of few areas globally suited to outdoor pork production. The Greater Christchurch area is home to 15 commercial piggeries.
- 9.2 Existing pork producers located within the Greater Christchurch Area are already adversely affected by reverse-sensitivity effects from residential or rural lifestyle development; in some instances, from repetitive and unfounded complaints.
- 9.3 Urban development does not occur on a blank canvas: it expands into rural areas which have land uses, infrastructure, environments and communities which are affected by urban development. Therefore, any spatial plan for Greater Christchurch needs to recognize and manage these potential issues.
- 9.4 NZPork supports the approach in the spatial plan of accommodating urban growth through intensification and planned expansion around existing urban hubs; the direction to protect highly productive land for food production; and introducing Green Belts. However, we submit the spatial plan needs to take a step further and recognise and manage all potential effects of urban development on rural land uses, particularly reverse-sensitivity effects. It needs to recognise and accommodate the need for rural land uses in the Greater Christchurch area to have room to grow.



NZ PORK

9.5 We also submit the Greater Christchurch Urban Partners need to commit to the directions in the draft spatial plan in their own statutory plans.

We would like to speak in support of our submission and are happy to provide further information or respond to any queries. Our address for service is on the front of this submission.

Yours faithfully


Lynda Murchison
Senior Environmental Advisor
for Brent Kleiss
Chief Executive

References

P. Feiger P & D, Dyason (2019) *Exploring Our Economy Series – Vol 1 Exploring- the Christchurch Industries*, Christchurch NZ, Christchurch.

P. Feiger P & D, Dyason (2019a) *Exploring Our Economy Series – Vol 2 Exploring Christchurch Growth Options*, Christchurch NZ, Christchurch.

P. Feiger P & D, Dyason (2019b) *Exploring Our Economy Series – Vol 3 Exploring Canterbury*, Christchurch NZ, Christchurch.

Ministry of Foreign Affairs and Trade (2020) *Regional Summaries, Canterbury, Research Report*, New Zealand Ministry of Foreign Affairs and Trade, Wellington.

Saunders C & J Saunders (2012) *The Economic Value of Potential Irrigation in Canterbury*, Agribusiness & Economic Research Unit, Lincoln University, Lincoln.

Unstated Author (2022) *Canterbury 2022 An Overview: A Report for the Canterbury Mayoral Forum*, Report 22/16, Christchurch.



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Helen **Last name:** Broughton

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Waipuna Halswell-Hornby-Riccarton Community Board

Your role in the organisation and the number of people your organisation represents:

Chairperson

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Halswell Hornby Riccarton Community Board - Submission Greater Christchurch Spatial plan FINAL
Halswell Hornby Riccarton Community Board - attachment
Halswell Hornby Riccarton Community Board - attachment2

SUBMISSION TO: Whakawhanake Kāinga Komiti
ON: The Greater Christchurch Spatial Plan
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser
[REDACTED]

1. INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on The Greater Christchurch Spatial Plan (“the Plan”).
- 1.2. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board understands from the maps in the Plan that the strategy was to connect Christchurch City with Rolleston and Rangiora. This appears a sensible objective, but the Board is concerned that the end destination is not Rolleston or Rangiora.
- 2.2. The Board is concerned that there appears no mass transit system to the East, Woolston, Linwood. The Board considers this remiss and this lack of development features as well in the Christchurch City Council’s Proposed Plan Change 14. This is likely to leave these suburbs to either become positively tranquil or decline.
- 2.3. The Board considers that it needs to be recognised that Christchurch City is not growing as fast as Waimakariri or Selwyn are growing. The Board questions the Plan’s growth projections for Christchurch City. Please refer to report by Mike Blackburn attached. (This was also referred to The Hearings Panel for Plan Change 14). The Board understand from mathematicians that it is difficult to model 60 years out with any accuracy and considers that the lack of accuracy needs to be stated.
- 2.4. The Board supports Mana Whenua priorities and expectations.
- 2.5. The Board supports the Christchurch Central City being the primary centre for Greater Christchurch, however, the Board does not agree that Papanui/Riccarton should be incentivised through planning. The Board considers that, through past poor planning decisions, Riccarton is situated very close to the central city and, in fact, competes with the

central city for retail and housing and that the more intensified housing is encouraged in Riccarton, the more the central city will decline.

- 2.6. The projection of 70 to 150 households per hectare for Riccarton and Hornby is far beyond the current medium density requirements of 30 Households per hectare. At present the number of households for the current medium density areas is 75 households per hectare. The Board believes that the aim should be for Riccarton and Hornby as per Papanui 50 to 100 households per hectare.
- 2.7. The Board supports a Mass Rapid Transit System provided it runs on a separate path. The Board Chairperson was a Councillor on the Christchurch City Council between 2001- 2013. In 2007 under Mayor Bob Parker a study was undertaken to look at a light rail system between the Central City and the University of Canterbury. Once the costings were done, they were so high any further discussion was abandoned. The Board considers that a Mass Rapid Transit system is very worthwhile provided it has its own path and does not involve the use of current large buses which have very low patronage.
- 2.8. It is important to look at the reality of six or three storied housing development. The Board suggests that generally the images portrayed look better than it is likely to be in reality (e.g. images on Page 41). Attached as an example are two schematic drawings of what three and six storeys will look like done by WSP in a report to Council for District Plan Change 14. The Board is concerned that overseas where intensification has occurred there are very few trees and large concrete developments.
- 2.9. The Board supports the concept of a Green Belt. The Board has indicated concerns regarding the level of intensification proposed in Plan Change 14, but supports the green belt to protect soils. The Board's view is that Christchurch has sufficient land supply until 2050 even with current levels of intensification. One does not have to choose between intensification and a green belt.
- 2.10. The Board supports Opportunity 1 to protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people's physical and spiritual connection to these places. It needs to be noted, in context the importance of including existing heritage buildings and those to be included through Christchurch City Council's District Plan Change 14 for the City and other territorial authorities.

- 2.11. The Board supports Opportunity 2 to reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change.
- 2.12. The Board supports Opportunity 3 to Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people.
- 2.13. While the Board generally supports Opportunity 4 to Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs, it cautions that existing communities should not be destroyed. To put this in context. The National Policy Statement on Urban Development should not be portrayed as positive. Councils should be neutral on this or leave it out. The Board is aware that many residents are angered by Central government directing Christchurch. Councillors were generally against Plan Change 14 when adopted- only four of seventeen speaking positively in favour.
- 2.14. The Board supports enabling the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services; along with the development of kāinga nohoanga within urban areas.
- 2.15. The Board supports ensuring sufficient development capacity is provided or planned for to meet demand.
- 2.16. The Board supports the concept that the projected demand for housing over the next 30 years is not a major issue for Greater Christchurch but does not accept one can project to 60 years. The Board accepts, however, that a reasonably conservative view has been taken- i.e. the understanding that a 60 year plan is based on housing remaining reasonably constant over time.
- 2.17. With reference to 4.3, the Board considers that growth needs to be factored in to Rolleston and Rangiora. With reference to Figure 11 the Board is unclear clear why Riccarton and Hornby have higher density than Papanui as both are on a major transport corridors. There may be a technical error in the numbers over the "walkup apartment". The apartment block shown has not been viewed positively by residents.

- 2.18. The Board considers the 4.5 goal to deliver thriving neighbourhoods with quality developments and supporting community infrastructure including Vibrant Communities with Access to Services is a worthwhile goal but the reality likely to be different. The area represented by Central Riccarton Residents' Association has been zoned medium density for approximately 30 years. It has not worked in terms of social connectedness. The area largely has a more transient population and has lost greenspace. It is congested, with cars parking on footpaths and Council berms. The Board suggests the Panel walks around this area to see the effects of the current medium density provisions.
- 2.19. In terms of Community facilities and open, green and public spaces the Board considers it is difficult to see how an existing area can be intensified and open space created. This is much more easily achieved in new developments. The risk is that intensification will occur with no further outdoor space being provided, which will increase social deprivation, isolation and at-risk young people.
- 2.20. Regarding 5.3 the Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy, the Board comments that there must be provision of appropriate infrastructure before any development occurs. It should indicate that infrastructure, planning, and funding must precede actual intensification.
- 2.21. The Board recognises that Opportunity 6: to Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural, and economic opportunities incorporates a goal to shift how people travel. The Board sees this an aspirational goal which will be difficult to realise given that even in current medium density areas many people (including young workers and students) use cars for work/sport/entertainment etc.

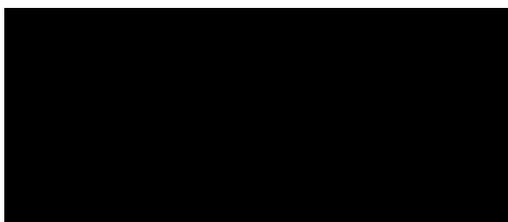
3. CONCLUSION

- 3.1. The Board requests that the Whakawhanake Kāinga Komiti takes into consideration the above submission on The Greater Christchurch Spatial Plan and in particular request that:
- That infrastructure and future greenspaces are in place before any intensification.
 - There is further consideration of the current rail network.
 - That Riccarton /Hornby and Papanui should be similar in terms of intensification.

- That clarification is required as to why Rolleston and Rangiora cannot be included.

3.2. While the Board acknowledges that the Plan is an aspirational document it is concerned that it was not consulted/briefed at an earlier stage. Residents in the Board area are generally against the intensification proposed in Plan Change 14 and the Spatial Plan takes intensification to another level.

3.3. The Board wishes to be heard in support of its submission.



Helen Broughton
Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 2023.



CANTERBURY CONSTRUCTION REPORT[©]

BLACKBURN
management

RECOGNISED MARKET LEADERS
**ASSOCIATE
MEMBER**

MULTI-UNIT DEVELOPMENTS CHRISTCHURCH CITY



Canterbury Construction Report[®]

2018 to 2022

Multi-Unit Developments

Christchurch City

Release date: January 2023
This report is prepared by
Blackburn Management Limited

The data used in this report has been taken from the
Monthly Building Consent Reports and other information provided by:

Christchurch City Council
Selwyn District Council
Waimakariri District Council
CoreLogic
Statistics New Zealand

Please Note:

The analysis contained in this report is based on information that has been supplied by the above mentioned Territorial Authorities and data providers, which is released as a matter of public record.

Additional information and market commentary is sought and provided by industry participants.

Although all attempts are made to verify the data where possible, no representation is made by Blackburn Management, its agents or staff as to the accuracy of this information.

This report provides an analysis of the multi-unit residential construction market in Canterbury. It focuses on new residential dwellings.

This report excludes certain data relating to rest home facilities or elderly persons housing, sleepouts or secondary buildings and relocatable buildings (not being built for a specific site).

No information in this report is provided with respect to Kainga Ora.

Some residential consents are issued across multiple stages. Information relating to these building consent applications are only included when the final stage has been consented.

Photographs, Images and Pictures

All Photographs, Images and Pictures in this report are used with permission, or are without copyright restriction in the public domain.

Executive Summary

I believe that the market for medium density multi-unit dwellings in Christchurch is currently oversupplied (I've been saying this for the past year).

I predict that the number of new residential units being consented in Christchurch in 2023 will fall by 20% to 30% over the next 12 to 18 months.

In the 12 months to December 2022 there were 3,032 multi-unit dwellings consented across 456 building consent applications (that's an average of 6.6 units per building consent application).



This is a 45% increase (943 units) over the 2,089 multi-unit dwellings consented in 2021.

Which was a 47% increase (667 units) over the 1,418 multi-unit dwellings consented in 2020.

New residential multi-units account for almost 7 out of 10 new dwellings consented across the City in 2022.

This has been a continuing trend since 2017.

The median size of these multi-unit dwellings is just 77 m² (on average, that's about 1.5 bedrooms).

The average household occupancy of Christchurch is 2.7 persons per household...you simply can't fit 2.7 people into a 1.5 bedroom unit (not as a short or medium term housing strategy for the City).

Over the past two years, the population of Christchurch has been in decline. Not by a tremendous amount, but it's definitely not growing (-0.5% in 2021 and -0.2% in 2022). Compare this to neighboring Selwyn (+5.0% in 2022) and Waimakariri (+2.0% in 2022).

You don't need more houses when your population is not growing (certainly not at the rate we have been building them over the past couple of years). To be fair...that's a very broad statement...but you get the idea.

Almost every builder and developer I have spoken to (pretty much from the start of 2022) has told me that unit sales are down (sales appear to be down across all parts of the market, including units, individual dwellings and sections).

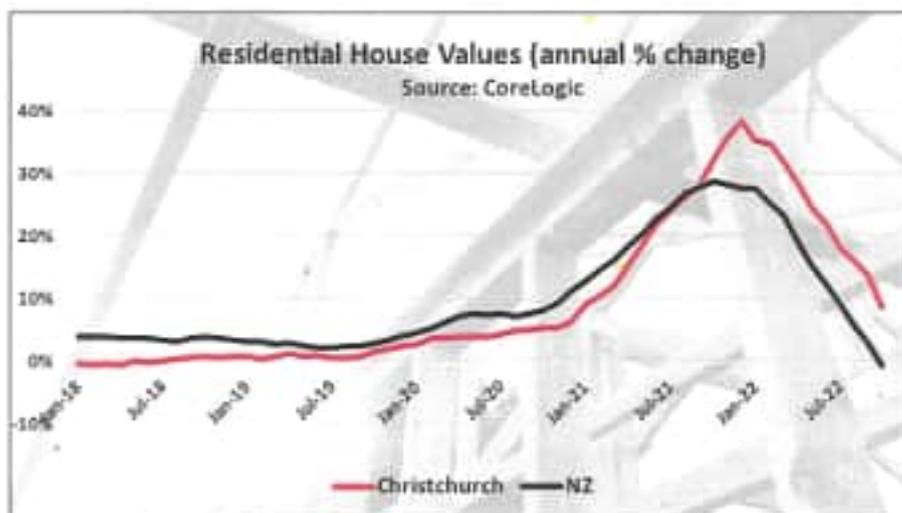
Many of the developments currently under construction were sold six or 12 months ago. With projects taking longer to sell in 2022, this will inevitably flow through to a slowdown in new building consents into 2023.

Property values aren't what they were this time last year (that's probably an understatement), but you could also argue that annual increases in value of 38.0% (December 2021, via CoreLogic) were never real and that values today aren't too far off what they would have been without the artificial bubble of 2021 and 2022.

I guess your point of view will depend on when and what you brought.

Unfortunately, this (and a projected ongoing increase in interest rates) will see a number of buyers (including builders and developers) now unable to settle these purchases, most likely forfeiting their deposit (and hopefully not much more) just to get out of the deal.

On-selling in a crowded market will further depress prices.



I suspect that the above graph probably looks like many developers sales charts.

Economically, it's going to be a tough year. A recession will make it harder to borrow money, which will be at higher interest rates. Developers will find it harder (than it already is) to find money for "spec" projects, which will inevitably be competing for fewer buyers (and most certainly, fewer investor buyers).

However, despite all of the above, it's not like the arse is going to completely fall out of the market.

Even if the market did come back by 30%, this still means that there would be somewhere around 2,000 new units consented across the city in 2023. This could still be a bit on the high side, given the limited population growth, but it often takes the building sector 12 months or more to catch up to the market.

We could see this decline continue through into 2024.

During the market crash of 2008 (following the Global Financial Crisis), building consent numbers dropped by around 45% over two years (before the earthquakes). Everything I have read and watched on in the pending economic recession suggests that 2023 won't be as bad as 2008...but how really knows?

I know many developers who are well prepared for this change in market conditions. The "writing has been on the wall" for anyone to see (if you were paying attention) for some time now. The market will slowdown...but we will keep on building, certainly not as many, but developers will adapt to the requirement of the market (what buyers want) and will change what, how many and where they build.

Unfortunately, this will be bad news for some developers who will need to redesign or potentially shelve some projects or (worst case scenario) look to sell out of others at a loss (again, on a crowded market). I expect that it will be a tough time for many builders and developers, with some not making it to the end of the year.

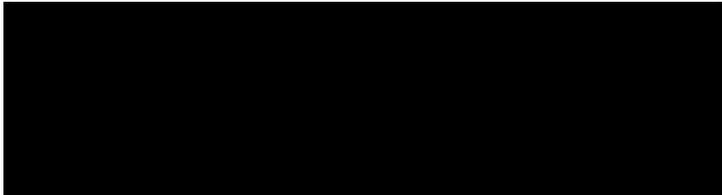
It's hard not to sound like the Grim Reaper, delivering this executive summary, but this is the state of the current market for multi-unit construction in Christchurch (and I suspect, across most of the Country).

In 2021, I issued a caution to the market, I am now upgrading that to a warning.

Anyone, working in, or building in, or investing in, or supplying to this market should read this report. It will change / crystallise your thinking on business for the coming year.

As always, I appreciate your comments and views on this report and the broader market.

Please give me a call if you have any questions.



Mike Blackburn
January 2023.



Figure 21: **Rata Street** looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration under a proposal of **12m height limit** within the Riccarton Bush interface.



Figure 22: **Rata Street** looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing **20m height limit** and possible apartment configuration under the **NPS-UD Built Form Standards**. Outcome may vary through High Density Residential Standard provisions.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Ann **Last name:** Hamilton

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
GCSP Submission - Ann Hamilton



**Whakawhanake
Kāinga Komiti**
Urban Growth Partnership
for Greater Christchurch

Received
Customer Service

210 JUN. 2023

Name: *Tina*



Huihui Mai
Let's come together

Draft Greater Christchurch Spatial Plan Submission form



Over the past 15 years, Christchurch and its surrounding towns have grown rapidly. By 2050, more than 700,000 people are projected to be living in Greater Christchurch - 30% more than there are today. The population could potentially double to 1 million people within the next 60 years, if not earlier.

Collective effort is required to increase resilience to natural hazards and climate change, improve access to employment, education and housing, reduce carbon emissions, and create a sustainable and prosperous future.

In our recent Huihui Mai engagement we asked residents how they thought we should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability.

Of the more than 7,000 people who responded to the online survey:

86%

agreed with the direction to focus growth around key urban and town centres and along public transport routes

56%

of people are open to higher density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people.

68%

Identified improving the health of waterways as a top priority

53%

of people agree with the proposed MRT route and 24% disagree. Agreement is much higher in suburbs along the MRT route (72%).

This information has informed the draft Greater Christchurch Spatial Plan, which is open for public submissions until 23 July 2023. Even if you were not part of the earlier Huihui Mai engagement - your feedback on the draft plan is still important. We want to know if we got it right.

Making a submission

Fill out the online submission form
or send us an email

www.greaterchristchurch.org.nz
huihuimai@greaterchristchurch.org.nz

Deliver* this form to:

Christchurch City Council Te Hononga Civic Offices, 53 Hereford Street, Christchurch
Selwyn District Council Offices, 2 Norman Kirk Drive, Rolleston
Waimakariri District Council Offices, 215 High Street, Rangiora
Environment Canterbury, 200 Tuam Street, Christchurch

Post* this form to:

Greater Christchurch Spatial Plan Consultation, Greater Christchurch Partnership, PO Box 73014, Christchurch 8154

*Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearing panel

If you make a submission, you can also speak to the Hearings Panel in support of your submission. Hearings on the draft Greater Christchurch Spatial Plan are scheduled to be held in October 2023.

Please note: We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However if requested, we will make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email huihuimai@greaterchristchurch.org.nz.

Webinar

We're holding a webinar on Tuesday 27 June between 12 - 1pm to talk about the plan and to answer any questions you might have. You can register for the webinar online at www.greaterchristchurch.org.nz

Once you register for the webinar you will have the opportunity to send in your questions either before, or during, and we will answer as many as we can. The webinars will be recorded and uploaded to this page so you can watch at another time if you are unable to attend.

Contact the team

If you'd like us to attend your community meeting or event. If you have any questions for the team please email us: huihuimai@greaterchristchurch.org.nz

Next steps

Late July - September Submissions are collated and a report is produced for the Hearings Panel

October & November Hearings and Deliberations

Whakawhanake Kāinga Komiti considers endorsement and recommendation to partners of the Hearings Panel Recommendations Report

Early 2023 Partners consider adoption of the Greater Christchurch Spatial Plan



Your details

First name	Ann		
Last name	Hamilton		
Preferred method of contact: Email/Phone	[REDACTED]		
Postal Address	[REDACTED]	Suburb	[REDACTED]
City	[REDACTED]	Postcode	[REDACTED]
Email	[REDACTED]	Daytime Phone	[REDACTED]

Optional

Age Under 18 years | 18 - 24 years | 25 - 34 years | 35 - 49 years | 50 - 64 years | 65 - 79 years | Over 80 years

Gender Male | Female | Non-binary | Another gender

Ethnicity NZ European | Māori | Pacific Peoples | Asian | Middle Eastern | Latin American | African | Other European | Other

If you're responding on behalf of an organisation, please provide

Organisation name

Your role

Number of people your organisation represents

Would you like to speak to the Hearings Panel about your submission? Your submission will be fully considered, regardless of whether you speak to the Panel.

Yes No

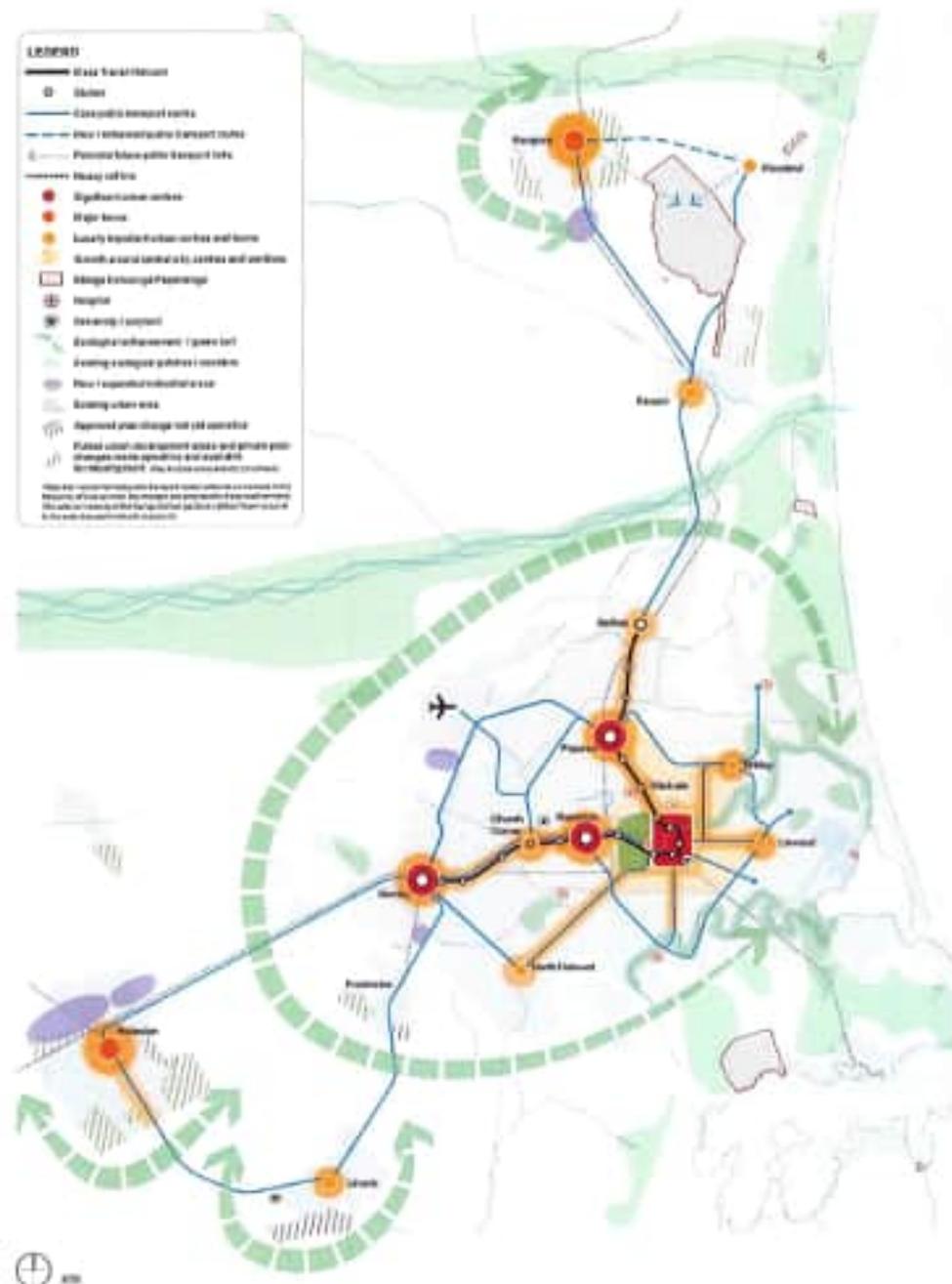
If yes, please ensure you have provided a daytime phone number in the details section so we can arrange a speaking time with you.



Questions

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The Greater Christchurch spatial strategy (1 million people)





Q1 The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions. Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes No Unsure

Why? Concentrating a large number of people in a small unnatural area is a ~~dist~~ disaster for health and wellbeing of the whole community.
Carbon emissions do not affect climate change

Q2 Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing. Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes No Unsure

Why? Life is lived outside the very narrow parameters your plan considers.

Right now the population is declining, deaths are up, births are down, and it may be many years before this trend changes so any plan based on population growth is now obsolete. NZ does not need the kind of immigrants that are causing huge social problems in Europe right now, either.

Q3a The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes No Unsure

Why? I support keeping the environment as natural as possible but that is not done by forcing people into small, unnatural habitats. This has been tried in many cities around the world with disastrous results. The Gorbals in Glasgow is a classic example: increased crime, depression, abuse, alcohol abuse, drug abuse and unemployment was the only result.



Q3b One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation. Do you support the concept of a Greenbelt around our urban areas?

Yes No Unsure

Why? The result will be a concentration of people in smaller areas. Where is this land going to be found? Under houses that already exist? We need to protect our heritage buildings as much as we need to protect the environment.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- a Offer opportunities for accelerated and/or significant development
- b Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- c Are in key locations where successful development gives effect to the draft Spatial Plan.

Q4 The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes No Partially

Why (please specify the Priority Area)

Why do we need to accelerate development? What is wrong with any development need being organically driven by the community? Who would the "partnership" be between? When clever phrases like Priority Development Areas and Urban Growth Partnership Spatial Plans are created it smacks of UN interference with our lives.



The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

 Opportunity 41	 42	 43	 44	 45	 46
<p>Protect, restore and enhance kaitiaki heke and other natural heritage and sites of significance in the city and provide for the city's physical and spatial connection to these places.</p>	<p>Reduce and manage risks in kaitiaki heke and communities are exposed to the impact of coastal hazards and climate change.</p>	<p>Protect, restore and enhance the natural environment, with particular focus on the kaitiaki heke, the environmental biodiversity, the connectivity between natural areas and amenability for people.</p>	<p>Provide diverse and affordable housing in locations that support strong neighbourhoods that provide for people's day-to-day needs.</p>	<p>Provide space for businesses and the economy to prosper in a low-carbon future.</p>	<p>Promote sustainable transport choices to ease people and goods to key geographic nodes, reduce greenhouse gas emissions and provide access to social, cultural and economic opportunities.</p>
<p>Enable the prosperous development of kāinga nohonga on Māori Land and within urban areas Focus growth through targeted intensification in urban and town centres and along public transport corridors</p>					
<p>1.1 Avoid urban development near (and) into lowlands.</p>	<p>1.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>1.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>1.4 Avoid urban development near (and) into lowlands.</p>	<p>1.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>1.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>2.1 Avoid urban development near (and) into lowlands.</p>	<p>2.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>2.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>2.4 Avoid urban development near (and) into lowlands.</p>	<p>2.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>2.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>3.1 Avoid urban development near (and) into lowlands.</p>	<p>3.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>3.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>3.4 Avoid urban development near (and) into lowlands.</p>	<p>3.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>3.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>4.1 Avoid urban development near (and) into lowlands.</p>	<p>4.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>4.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>4.4 Avoid urban development near (and) into lowlands.</p>	<p>4.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>4.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>5.1 Avoid urban development near (and) into lowlands.</p>	<p>5.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>5.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>5.4 Avoid urban development near (and) into lowlands.</p>	<p>5.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>5.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>6.1 Avoid urban development near (and) into lowlands.</p>	<p>6.2 Protect, restore and enhance kaitiaki heke and other natural heritage.</p>	<p>6.3 Ensure the resilience of communities and ecosystems to climate change and natural hazards.</p>	<p>6.4 Avoid urban development near (and) into lowlands.</p>	<p>6.5 Ensure sufficient development capacity is provided or planned for to meet demand.</p>	<p>6.6 Focus, and increase, intensification of housing to areas that support the desired pattern of growth.</p>
<p>Key Moves 47-50</p>	<p>The prosperous development of kāinga nohonga</p>	<p>A strengthened network of urban and town centres</p>	<p>A more rapid transit system</p>	<p>A collective focus on unlocking the potential of Rangi Avenue</p>	<p>An enhanced and expanded blue-green network</p>

Q5 Do you agree with the draft spatial strategy outlined above?

Yes No Partially Unsure

It would be helpful to understand which aspects you support or do not support and why:

Reading the outline it becomes very obvious that this strategy is not being created by the people who live in the GC area. Section 4.3 says "Focus and incentivise, intensification of housing to areas that support the desired pattern of growth." This leads to the question; whose desired pattern of growth? The UN model or one that grows organically through the efforts and desires of the people that make up the community? Why does housing have to be incentivised and intensified? Who profits from this push?

Q6 Do you have any feedback on other aspects of the draft Spatial Plan?

This strategy smacks of UN's strategic goals and needs to be dropped immediately before any more of the communities spare money gets spent on it. Every day more and more people wake up to the truth about the corporate nature of the UN, Governments and Councils and reject their interference in our lives.

Let the community act organically and the future will take care of itself. We do not need the UN telling us how to live our lives.

P.S. Climate change is a scam. How can you tell? If a tax is involved it's a scam. If the powers that shouldn't be are still flying to Davao every year in their private jets while we are told by them to stop driving our cars, it's a scam.



Whakawhanake
Kāinga Komiti
Urban Growth Partnership
for Greater Christchurch



greaterchristchurch.org.nz

Greater Christchurch Partnership
PO Box 73014, Christchurch 8154

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 27/07/2023

First name: Troy **Last name:** Lange

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Trojan Built Property Holdings Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
2261GCSpatial Plan submission - Trojan Built Properties Ltd and Troy Lange

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Submitter Details

Name: Trojan Built Properties Ltd and Troy Lange

Postal address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Contact Person

Fiona Aston

Hearing Options

We do wish to be heard in support of our submission. If others make a similar submission, we may consider presenting a joint case with them at the hearing.

Introduction & Background

Troy Lange is director Trojan Built Properties Ltd, which is a construction company based in Christchurch and which has development interests in west and south Greater Christchurch, including land affected by the Christchurch International Airport Ltd airport noise contours.

We have lodged a submission and further submissions on Proposed Change 14 to the Christchurch District Plan seeking an amendment to the Airport Noise Qualifying Matter (ANQM) such that it only apply to areas within the 55 dBA Ldn airport noise contour; is based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths; and that the Annual Average rather than Outer Envelope contour apply. The submission also seeks removal of the Low Public Transport Accessibility Qualifying Matter (LPTAQM), in particular as it applies to north west Christchurch; and rezoning land between the 50 and 55 Ldn CIAL airport noise contour for urban development (Future Urban Zone or Medium Residential), with no restrictions relating to airport noise, in particular but not limited to 120, 100, 88, 76, 68, 66, 60, 46, 44, 42, 40 and 38 Hawthornden Road as shown on Figure 1 below.



Figure 1: Location of Hawthornden Road properties sought to be rezoned for urban residential development (and other land within the 50 dBA airport noise contour) – outlined in red. Operative 50 dBA airport noise contour – hatched blue line.

Relief Sought (see also Response to Online Questions below)

We seek the following amendments to the Draft Greater Christchurch Spatial Plan (the Spatial Plan), and any other additional, consequential or alternative amendments which give effect to the intent of our submission and our interests:

Map 5: Areas to protect and avoid, Map 9 Strategic infrastructure

Amend Maps 5 and 9 such that the Christchurch Airport Noise Control Zone (CANCZ) apply to land within the 57 dBA airport noise contour, such contour to be based on the methodology adopted in the Christchurch Airport Remodelled Contour Independent Expert Panel Report (June 2023) except that it be based on a maximum 30 year assessment period having regard to matters such as future growth projections, predicted flight paths and expected flight paths and not ultimate runway capacity; and that the Annual Average not Outer Envelope contour apply. Maps 5 and 9 should also show the 65 dBA airport noise contour, based on the same assumptions and methodology as stated above for the 57 dBA contour, and the Spatial Plan should clarify that sensitive activities (as defined in the

Christchurch District Plan, or similar) are permitted between the 57-65 dBA contour, subject to appropriate acoustic insulation, and that no noise mitigation measures are required outside the 57 dBA airport noise contour.

Reason:

The Map 5 and 9 Christchurch Airport Noise Control Zones show the operative CIAL airport 50 dBA and 55 dBA airport noise contours. These are now out of date. The amended contours as recommended by the Independent Expert Review Panel are based on the most up to date information and best practice, but do not make recommendations regarding the appropriate contour to use for noise control purposes, and only model future airport growth projections based on ultimate runway capacity (as per their terms of reference).

The amended CACNZ sought in this submission is consistent with international best practice and NZS 6805:1992, Airport Land Use Management and Land Use Planning (NZS 6805) and is the most appropriate way to achieve the purpose of this Act having regard to the costs, benefits and risks associated with alternatives.

We further submitted on the PC14 in support of the Miles Premises Ltd submission which sought that noise controls apply at the 57 dBA airport noise contour.

Protecting strategic infrastructure

~~Urban development should be avoided~~ **Appropriate measures should be applied** around strategic infrastructure, to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network (see Map 9).

Reason:

Consistent with Christchurch District Plan Change 5E decision which requires acoustic insulation for sensitive activities where noise levels exceed 55 dBA (railway noise) and 57 dBA (road noise). The same approach i.e. managing noise effects on sensitive with acoustic insulation requirements should apply to airport noise. This is also the current operative District plan requirement for development subject to airport noise.

Maps 2 and 14

Amend Maps 2 and 14 to identify land between the 50-57 dBA revised airport noise contours (as requested to be defined under 'Maps 5 and 9' above) as new/expanded residential areas, with no restrictions in relation to airport noise, including 76 Hawthornden Road. In the alternative, some of this land (but not 76 Hawthornden Road) could also be identified for

business purposes. 76 adjoins existing residential development and is highly suitable for and a logical extension of existing residential development.

Table 2: Sufficiency of housing development capacity to meet projected demand (2022 – 2052)

Table 3: Sufficiency of industrial land to meet projected demand (2022 – 2052)

Decisions on recent Selwyn private plan change requests consistently agree with evidence that the Council's housing and business capacity assessments underestimated housing and business capacity, and overestimated available capacity, and did not meet the requirements of the National Policy Statement – Urban Development (NPS-UD). We understand that essentially the same Council methodology underlies the figures in Tables 2 and 3. They should be revised to reflect best practice and ensure that they comply with the NPS-UD.

Response to Online Form questions (where relevant to Miles Premises Ltd and our interests)

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

Do you support the improved public transport system proposed in the draft Spatial Plan?

We are concerned that the Spatial Plan and future urban form is predicated on a future Public Transport (PT) system including Mass Rapid Transit (MRT) proposal for which there is no funding in place and no approved business case in support of MRT. Yet 75% of (presumably new) homes and 81% of jobs are anticipated along the MRT corridor. (MRT Mass Rapid Transit Indicative Business Case for Greater Christchurch- Summary May 2023). There is only a 5 % difference between the three urban growth scenarios (compact, consolidated and dispersed) in terms of reductions in greenhouse gas emissions i.e. between 40-45% reduction (Urban Form Scenarios Evaluation Report 2022) which is a minimal difference and, on its own does not justify the very large investment required for MRT (\$3-\$4 billion to build).

The desire for a viable MRT appears to be driving the form of urban growth, rather than 'the other way round'. Whilst we support the core PT routes and MRT in principle, we do not support the compact urban form growth model which concentrates all future growth along these PT routes, and appears to not make any provision for urban growth elsewhere, including residential development within the 57 dBA airport noise contour, as sought in our submission.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

Disagree.

Apartments and terraced housing are not necessarily more affordable than other housing typologies for many first time home buyers. The background work on Proposed Change 14 demonstrates this. Moreover as mass transit becomes more established housing near stations becomes sought after, thereby pushing up prices and contributing to gentrification. This is not to say that this urban structure does not have validity but there are fishhooks.

There needs to be a balance between and ample provision for greenfield development and intensification, including our land (the Site) in accordance with the mandatory requirement of the National Policy Statement -Urban Development (NPS-UD) Policy 1 to have or enable a variety of homes that meet the needs, in terms of type, price, and location, of different households.

The Spatial Plan is proposed as the Future Development Strategy for Greater Christchurch, as required by the NPS-UD (Subpart 4). However, the background document 'Urban Form Scenarios Evaluation Report' acknowledges that the it does not meet the mandatory NPS-UD requirement for every local authority to provide at least sufficient development capacity in its region or district to meet expected demand for housing and business land (see p 13). There is a projected a shortfall in Selwyn and Waimakariri Districts.

Whilst over time, and with an ageing population, there may be a gradual shift towards more apartment living (with lifts), this cannot be forced by unrealistically restricting other forms of housing.

The inadequate supply of land for other forms of housing will result in scarcity, greater potential for monopolistic practices and continued escalation in land and house prices, and a continuation of the price escalation which has occurred in recent times. This is contrary to the NPS-UD which requires planning decisions to improve housing affordability by supporting competitive land and development markets (Objective 2).

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

There is a potential conflict between transit orientated development and centres based development. Both are partly based on achieving agglomerations of scale and there needs to be sufficient growth in the short to medium term to achieve both.

The 'compact urban form' proposed focuses future development and investment around the MRT corridor and core PT corridor. Our land ('the Site') is located on a core PT corridor (and potential future MRT route) and is an ideal location for residential development, including potential medium/high density residential development and mixed development. Its development for residential purposes will contribute to a well functioning urban environments.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below....

Do you agree with the draft spatial strategy outlined above?

Partially – there need to be amendments to as set out below (shown in bold and underlined or strike out)

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

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

Reason – consistent with wording of NPS-UD.

4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

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

Reason – consistent with NPS-UD.

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

We support #6 in principle, noting that this focus is necessary to give effect to the Government's Emission Reduction Plan (ERP) targets. However, we do not consider that a focus on attempting to manipulate the current urban form of GC to one that will create sufficient population density to help support the viability of the proposed mass rapid transit system is the appropriate key move to achieve this. It is not realistic, may never 'see the light of day', and will have negligible benefits in terms of reduced greenhouse gas emissions.

Further residential development opportunities, including our Site need to be enabled by the Spatial Plan.

Do you have any feedback on other aspects of the Draft Spatial Plan?

See 'Relief Sought' above and our further comments below.

NPS-UD

As acknowledged in the background document assessing alternative growth scenarios, the proposed Spatial Plan is a Future Development Strategy as required under the NPS-UD which does not meet the mandatory requirements of the NPS-UD. It doesn't provide for sufficient development capacity in Selwyn and Waimakariri.

In addition, it will not meet the NPS-UD requirement for planning decisions to contribute to well functioning urban environments – in terms of Policy 1, it will not

- have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households (1a)
- support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- support reductions in greenhouse gas emissions to any greater extent than other growth scenarios (a mix of consolidated and dispersed growth) which meet all the other requirements of the NPS-UD including providing at least sufficient development capacity for housing and business land.

It simply cannot proceed in its current form as it will not give effect to higher planning documents, specifically the NPS-UD.

Maps 2 and 14

The Spatial Plan does not meet the requirement for a FDS to spatially identify the 'broad locations' in which at least sufficient development capacity for housing and business land will be provided over the long term, in both existing and future urban areas. Maps 2 and 14 only show existing urban areas and approved rezonings, and is cadastrally based rather than showing broad locations. It continues the current CRPS approach of applying a firm immovable Metropolitan Urban Limit. Decisions on private plan change for rezoning in Selwyn District have consistently found that this is in direct conflict with the NPS-UD direction and associated guidance documents.

Implementation

The Draft Spatial Plan does not meet the NPS-UD implementation and review requirements for a FDS.

The NPS-UD requires a FDS to include an Implementation Plan which must be updated annually (Clause 3.18). The Spatial Plan has no provision for updating the Implementation Plan, simply noting that progress on the proposed Joint Work Programme will be updated every two years.

The FDS must be reviewed every 3 years (Clause 3.16) whereas the Draft Spatial Plan only commits to a review every 5 years.

Ongoing monitoring and review is essential, and a firm written commitment as a minimum to the FDS mandatory review and updating requirements. The Spatial Plan needs to be a 'living' and flexible document if it has any chance of keeping pace and being responsive to urban growth needs in a fast changing world/receiving environment and in the context of some very significant and immediate environmental challenges (in particular climate change) and the focus of the entire urban form / future on one which will support costly and uncertain public transport initiatives including MRT.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 27/07/2023

First name: Jendy **Last name:** Judd

Your role in the organisation and the number of people your organisation represents:

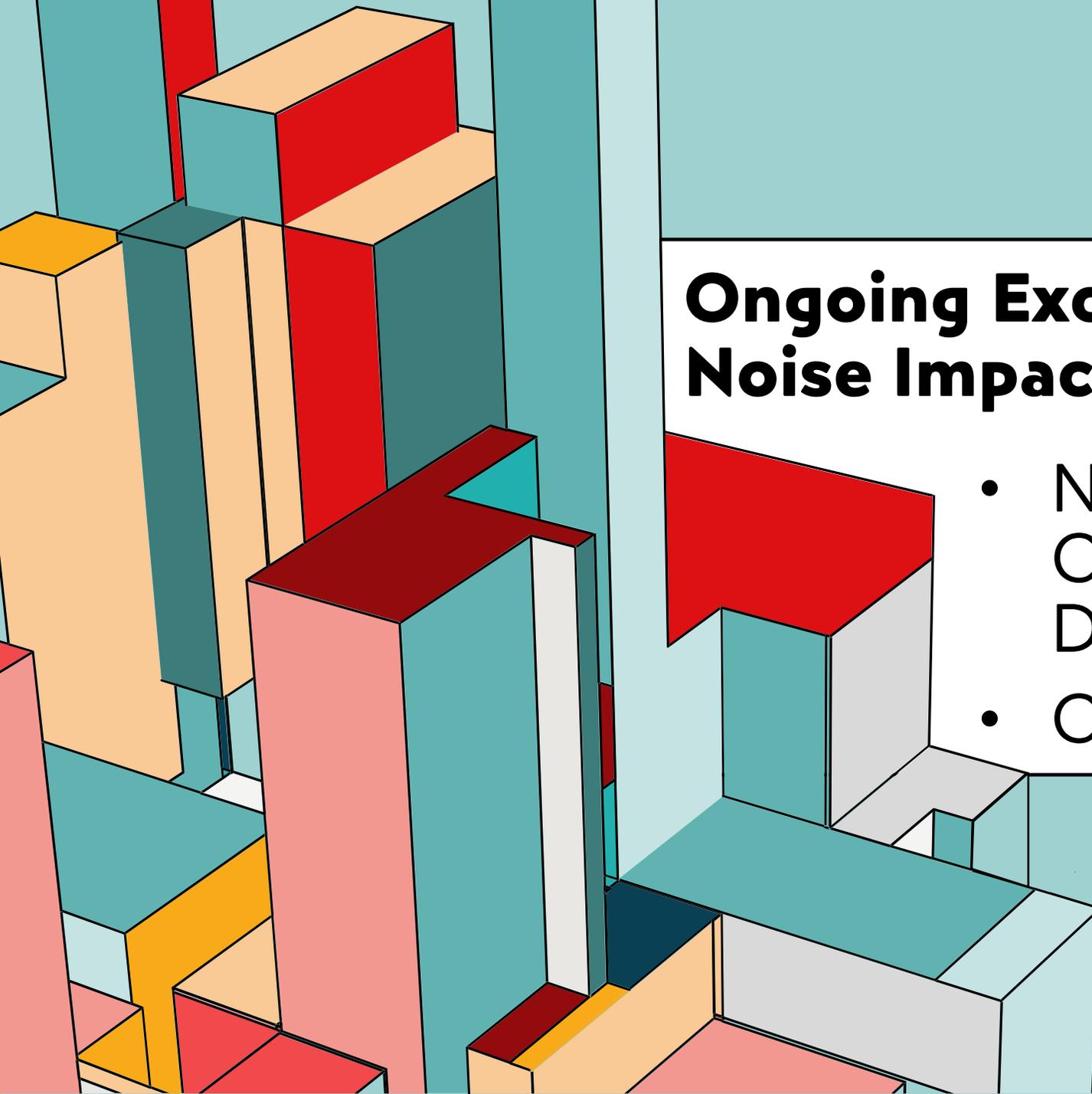
Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
JENDY JUDD - Presentation - Airport Noise Liaison Committee March 22 FINAL - without notes
JENDY JUDD - 20220531_Coringa_Rd_Memo_Noise
JENDY JUDD - Greater Chc Spatial Plan - FeedbackJ July 2023 FINAL PDF



Ongoing Excessive Operational Noise Impacting local Community

- Noise in excess of Noise Contours within the District Plan (DP)
- Community Ignored

ABOUT US

- Jim Turpin Resident 30+ years
- Morrie Woodham Resident 30+ years
- Andrew Schulte Principal, Cavell Leitch
- Jendy Judd Resident 10 years

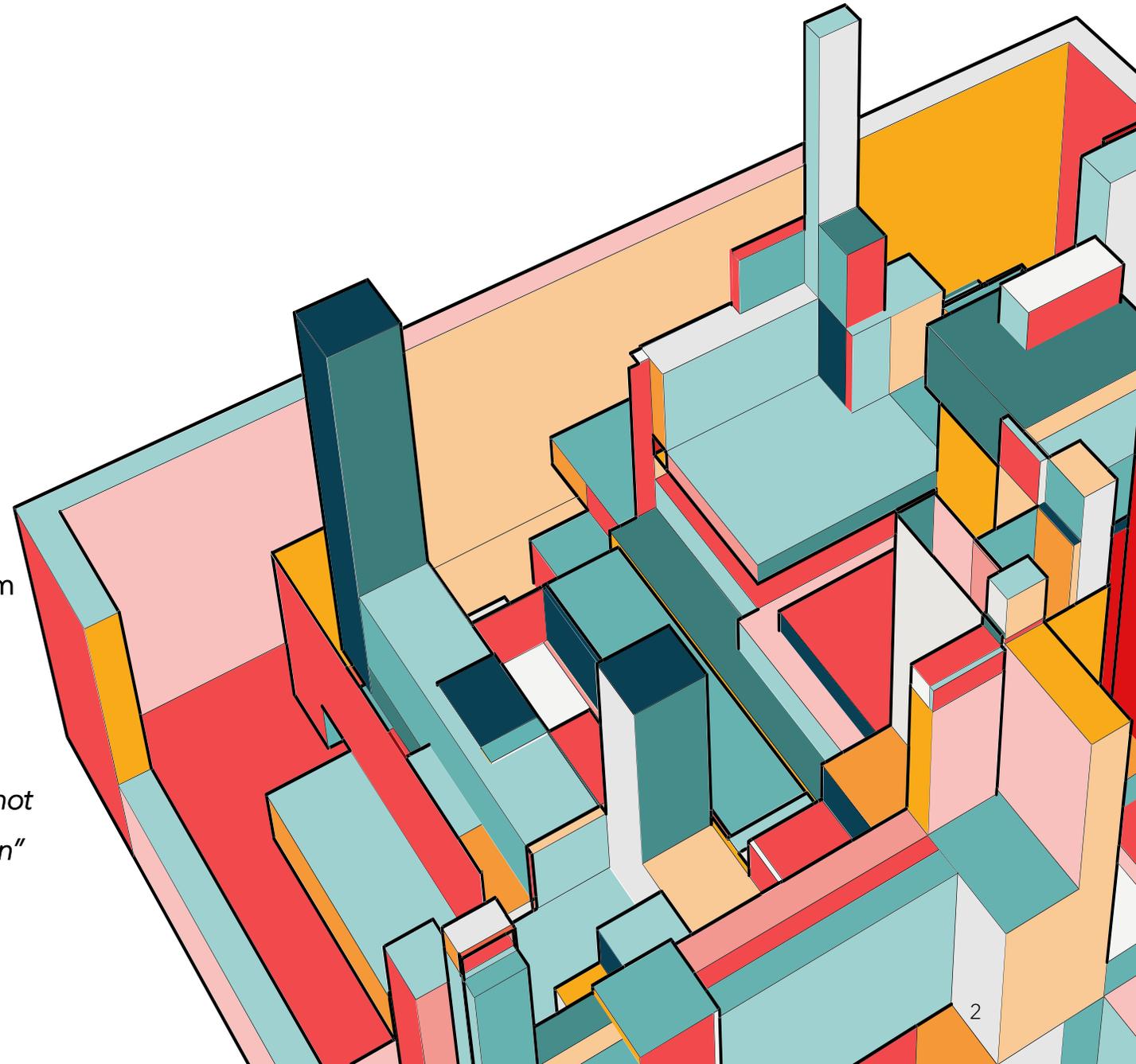
Local Community

- Yaldhurst had a population of 1,602 (2018 NZ Census)
- School (approx. 120 students, opened 1876)
- Businesses, church, memorial hall, families, livestock, museum

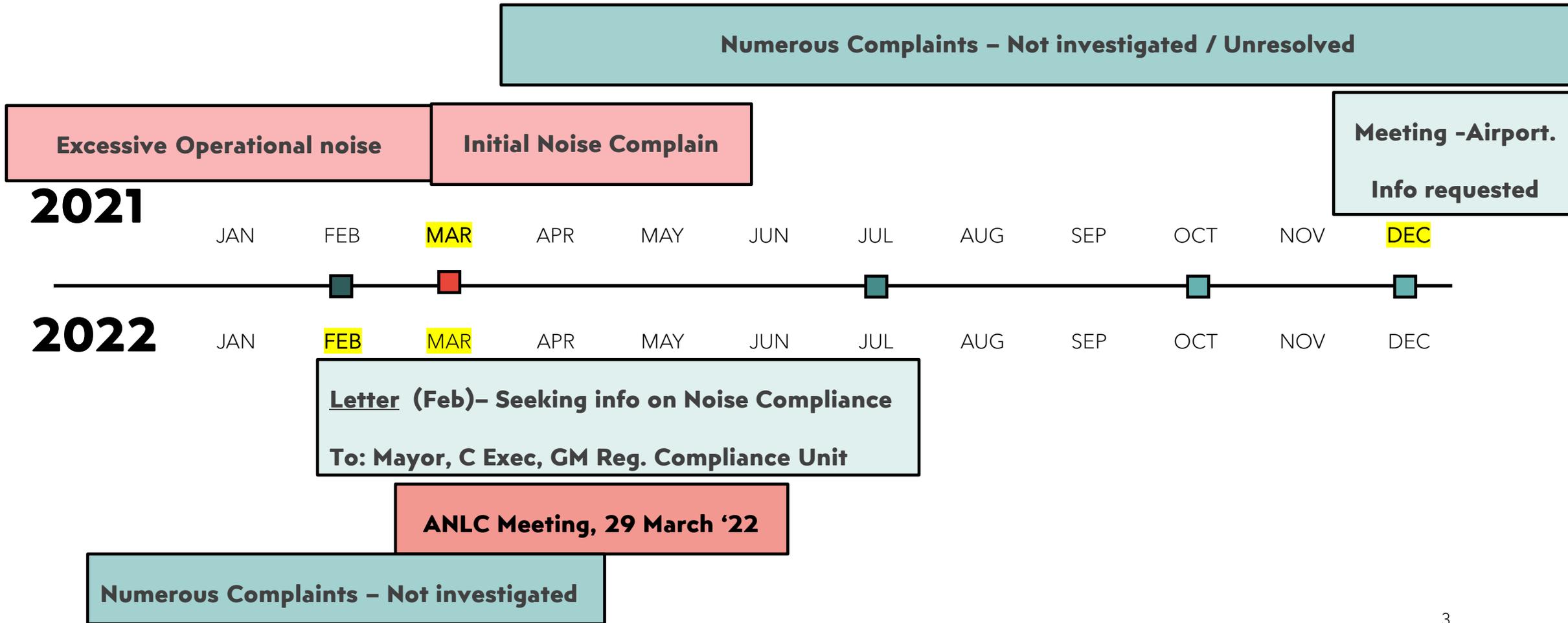
Ref: CCC District Plan

“The Christchurch District Plan requires operational aircraft noise does not exceed 65 dB Ldn within the area outlined in Figure 1 of the District Plan”

55dB and 50dB are noise contours beyond the 65dB contour



TIMELINE



ONGOING ISSUES – EXCESSIVE NOISE

Significant Operational Noise- In excess of Noise Contours expressed within DP

- *Significant changes to flightpath (Southern runway)*
- Unreasonable noise
- *Within 55dBA Contour*
External noise recordings all above 65dBA, to 80+dBA;
Internally 61dBA +

Community Disconnection

Complaints Process Ignored (ANMP)

1. First complaint March '21 (Jendy)
2. Numerous complaints '21-'22
3. No investigations
4. All unresolved
5. Awaiting info for peer review

Costs – Health, Wellbeing, \$

1,602 Residents + school

- Duty of care – legal and moral obligations
- Psychological harm: stress, loss of sleep, emotional
- Impact to wellbeing and enjoyment of life
- Residents' investment based on noise contours

Airport Acoustic Report: Limited /narrow scope, methodology and reporting - Misleading & deceiving

- Methodology & data gathered unfit for purpose
- Data from **ONLY 2** noise measurement stations at airport, not within community
- Data gathered only 3mths per year, not 12mths; averaged
- Only 2019 data used for 2022 & 2021 reports

EASY, SIMPLE SOLUTIONS

To ensure daily compliance to existing noise contours within District Plan and improve the health and wellbeing of 1,602+ residents

**Immediately
reinstate Flight
Paths - Sth RW**

 **Positive** impact on health and wellbeing of residents

**Benefits of the DP
applies to all parties.**

**Engage and
support the
community**

**Resolve
Complaints**

1. All Investigated
2. All resolved
3. Simplicity, honest, integrity, proactive
4. Need for less committees

**Openly Share
Information**

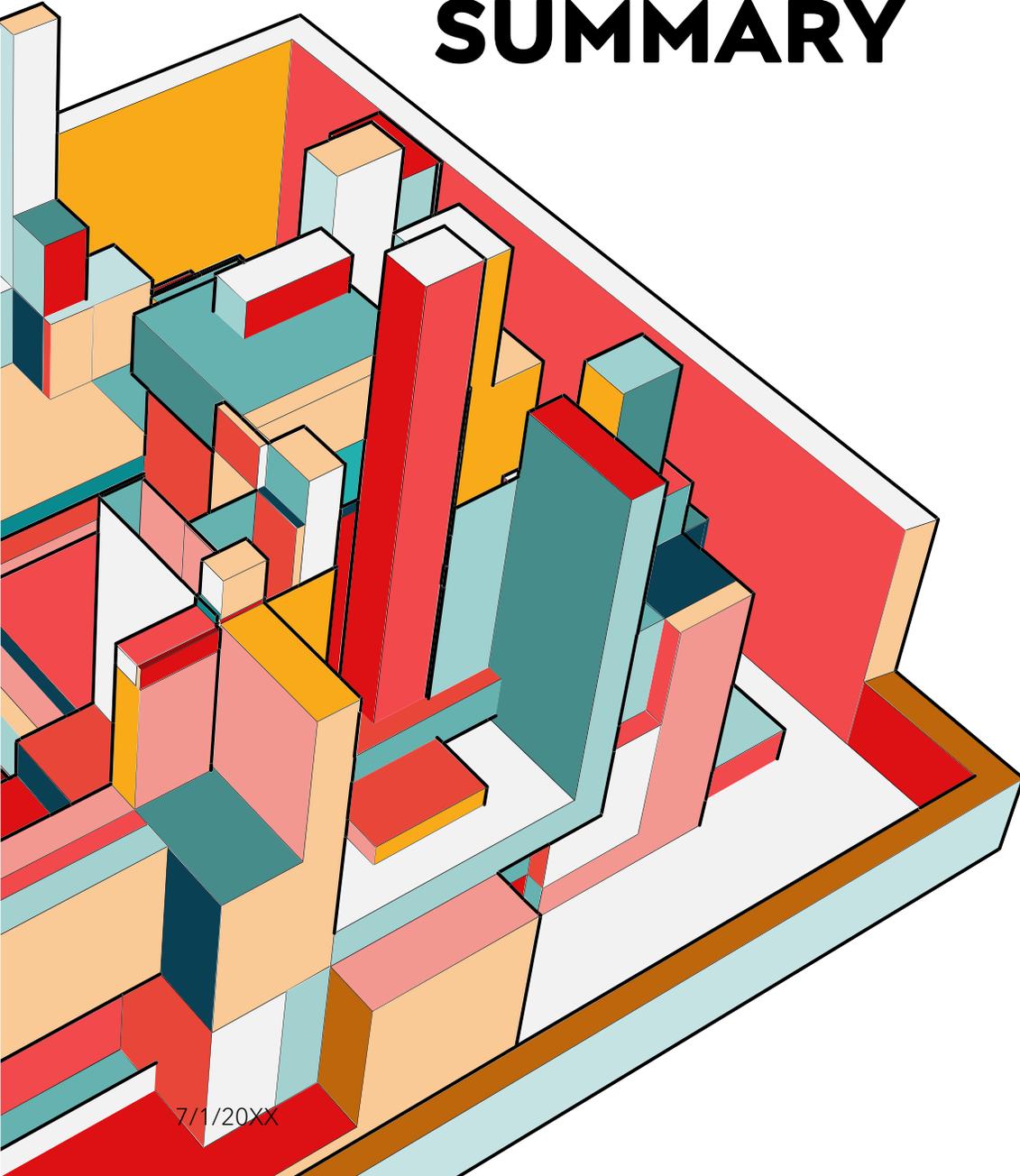
Be transparent

1. Peer review - Raw data (Letter dated 16 Feb '22)
2. Scope of work to Marshall Day (March '22)

**Acoustic Report:
Redesign scope, methodology
and measuring to ensure noise
reduction and compliance *at all
times***

- Report methodology based upon exceeding DP and H&S requirements, at all times.
- Data from previous 12 mths from numerous measurement stations, for all flights, throughout all contours and residential areas

SUMMARY



Requests:

- **Reinstate** former flight paths
- **All flights aligned to all noise contours** expressed within the DP to improve health & being of community
- **Immediately** address effects of airport noise on the local community
- Risk assessments and risk management to minimise noise
- Establish numerous noise measuring stations throughout all contours and community
- Daily, all year, monitoring and compliance to existing noise contours within District Plan
- Transparent and thorough monitoring, investigation, reporting and management of noise

QUESTIONS TO THE COMMITTEE

“The Christchurch District Plan requires operational aircraft noise does not exceed 65 dB L_{dn} within the area outlined in Figure 1 of the District Plan.”

Noise contours with the District Plan (DP)

- I am within 55dBA.
- What noise environment should I experience at my home?
- For residents' in 50dBA?

Immediate Changes

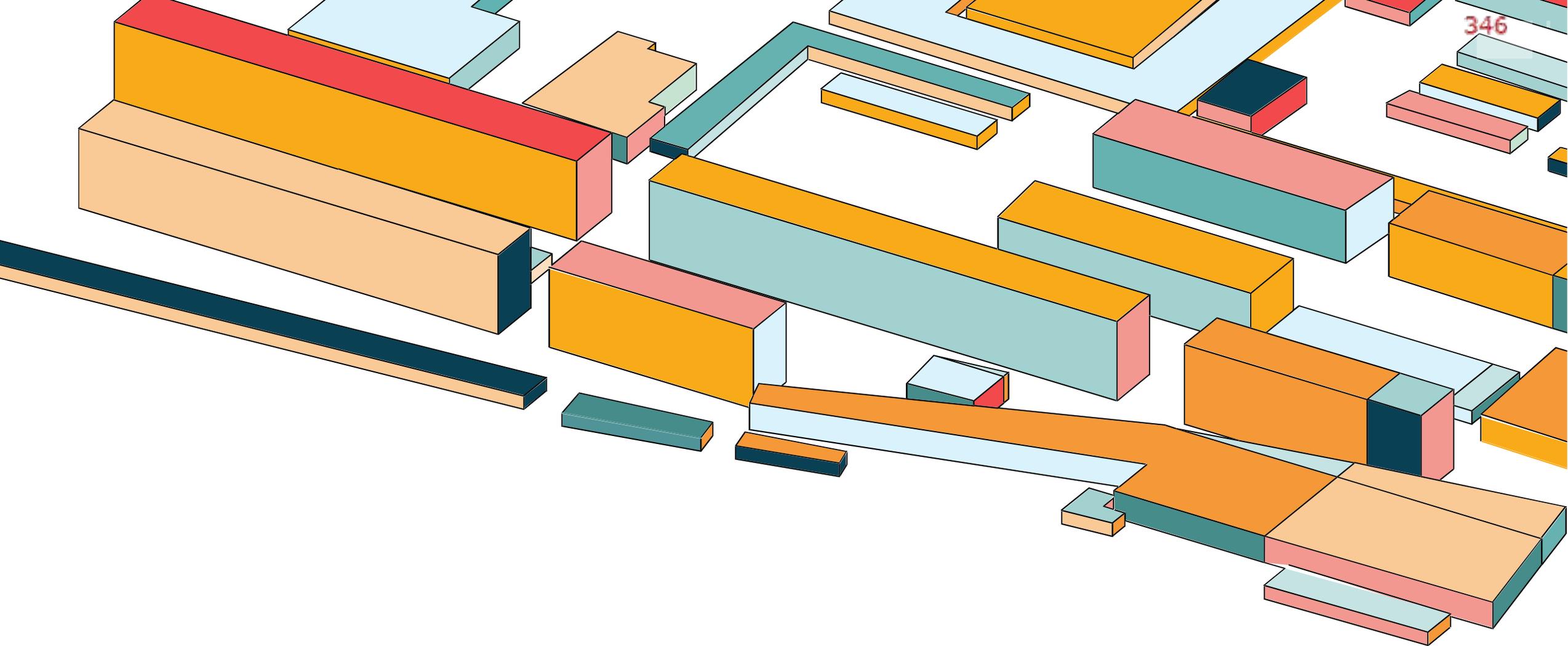
What changes will you implement immediately to improve resident's wellbeing?

- Implement within the next 3mths?
- Next steps in dispute resolution process?

Accurate data - collection and interpretation

Measurements stations - how will gather daily data within Yaldhurst?

What changes will be taken to ensure the actual/real time noise environment is properly understood?



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THANK-YOU

MEMO

Project:	Christchurch Airport Noise	Document No.:	Mm 03
To:	Christchurch International Airport Ltd	Date:	31 May 2022
Attention:	██████████	Project No.:	20190737
From:	██████████	No. Pages:	5
		Attachments:	No
Subject:	██████████ - Aircraft Noise Levels		

Christchurch Airport has asked Marshall Day Acoustics (MDA) for assistance in responding to concerns raised by the resident(s) of 34 Coringa Road with the Christchurch Airport Noise Liaison Committee.

In particular, MDA has been asked to respond to the following questions.

1. Is L_{dn} (3 month) an appropriate measure for aircraft noise?
2. What noise environment should be experienced at 34 Coringa Road?
3. Has the noise experienced at 34 Coringa Road increased due to the use of DMAPS¹?
4. Does Christchurch Airport comply with the District Plan Noise Limits?

We hope the following explanation assists with the understanding of these issues.

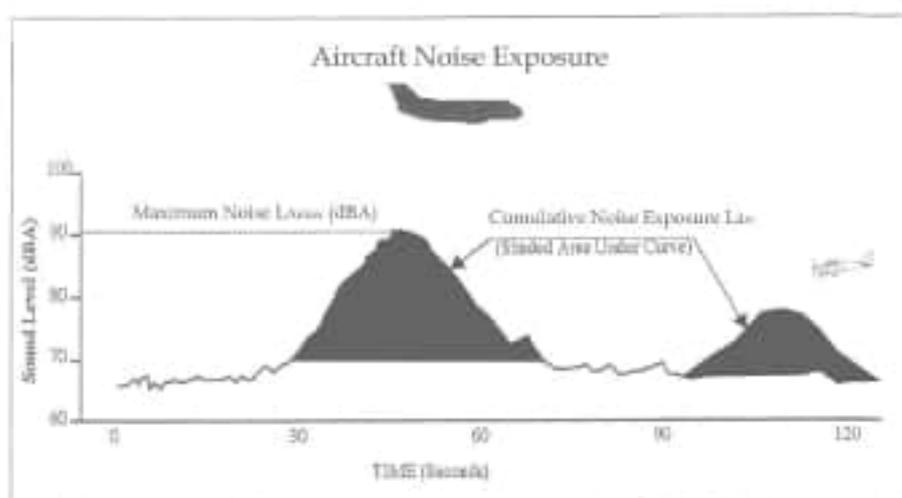
1. Aircraft Noise Metrics

Two main noise metrics are used for the measurement of aircraft noise throughout the world: L_{dn} and L_{Amax} – both are measured in A-weighted decibels (dBA).

L_{dn} (the Day Night Noise Level) is a ‘cumulative noise exposure index’. It is influenced by the number of aircraft noise events that occur and how loud they are individually. L_{dn} can be determined over a 24-hour period or over several months.

L_{Amax} is the maximum noise level (dBA) recorded during an aircraft flyover (as shown in Figure 1 below). It is a single event noise metric that gives a measure of how loud an individual aircraft is. While L_{Amax} can be useful, it makes no allowance for the cumulative impact of noise events experienced.

Figure 1: Aircraft Noise Events



¹ DMAPS is an AIRWAYS departure procedure where aircraft make a turn of 15 degrees when they reach an altitude of 500ft

While the L_{dn} and L_{Amax} metrics are both expressed in A-weighted decibels (dBA), they are completely different metrics with different measurement parameters and cannot be compared with each other. L_{Amax} will always be a much higher 'number' than L_{dn} . For example, a hypothetical site affected by aircraft noise, might have a cumulative noise exposure of 60 dB L_{dn} and single event maximum noise levels of 70 to 80 dB L_{Amax} from individual aircraft depending on the aircraft size.

L_{dn} is used in the New Zealand Standard NZS 6805:1992 'Airport Noise Management and Land Use Planning', and the standard recommends it is assessed over a 3-month period. This standard was finalised after several years of consultation and reflects a consensus among many key stakeholders including the Ministry of Transport (Waka Kotahi), the Ministry of Health, local authorities, residents' groups, airlines and acoustic consultants.

For compliance assessment, the Christchurch District Plan rules specify that the busiest 3-month period over the year (that is the noisiest 3 months) should be used.

L_{dn} (or other similar noise exposure metrics) are used at every airport in Europe, America, Australia and New Zealand. L_{dn} (or similar) is also used in virtually all of the international research into community response to aircraft noise.

It is MDA's view that this is the most appropriate community noise index currently available.

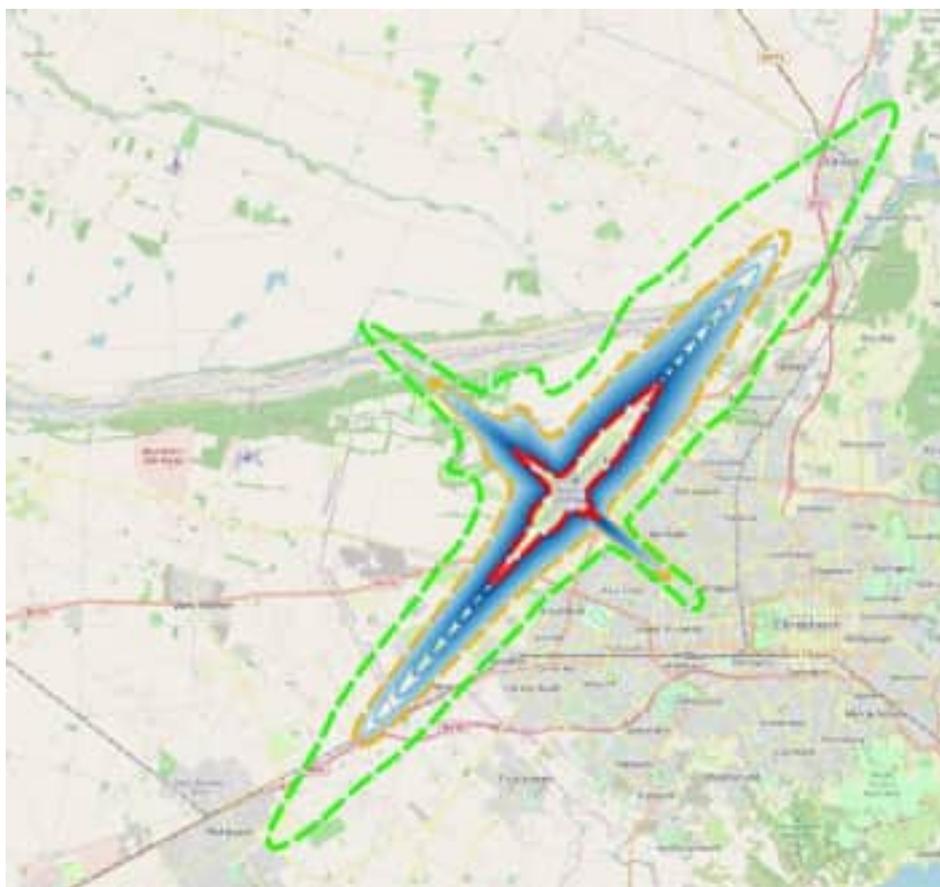
2. Expected noise environment at 34 Coringa Road

Figure 2 depicts the Operative Noise Contours around Christchurch Airport which are part of the Christchurch District Plan.

The red line represents the 65 dB L_{dn} boundary, the yellow represents the 55 dB L_{dn} boundary and the green represents the 50 dB L_{dn} boundary.

It is important to note the unit of measurement here is dB L_{dn} . As in point 1 above, this is a *cumulative noise exposure index* which cannot be compared to L_{Amax} levels of individual aircraft noise events.

Figure 2: Operative Noise Contours



It is important to understand the expected noise environments in the areas between the noise contour boundaries are *graduated*.

Specifically, [REDACTED] Road sits between the 65 dB L_{dn} boundary and the 55 dB L_{dn} boundary. Its expected future noise environment is, therefore, above 55 dB L_{dn} and below 65 dB L_{dn} .

Figure 3: Operative Noise Contours 55 to 65 dB L_{dn}

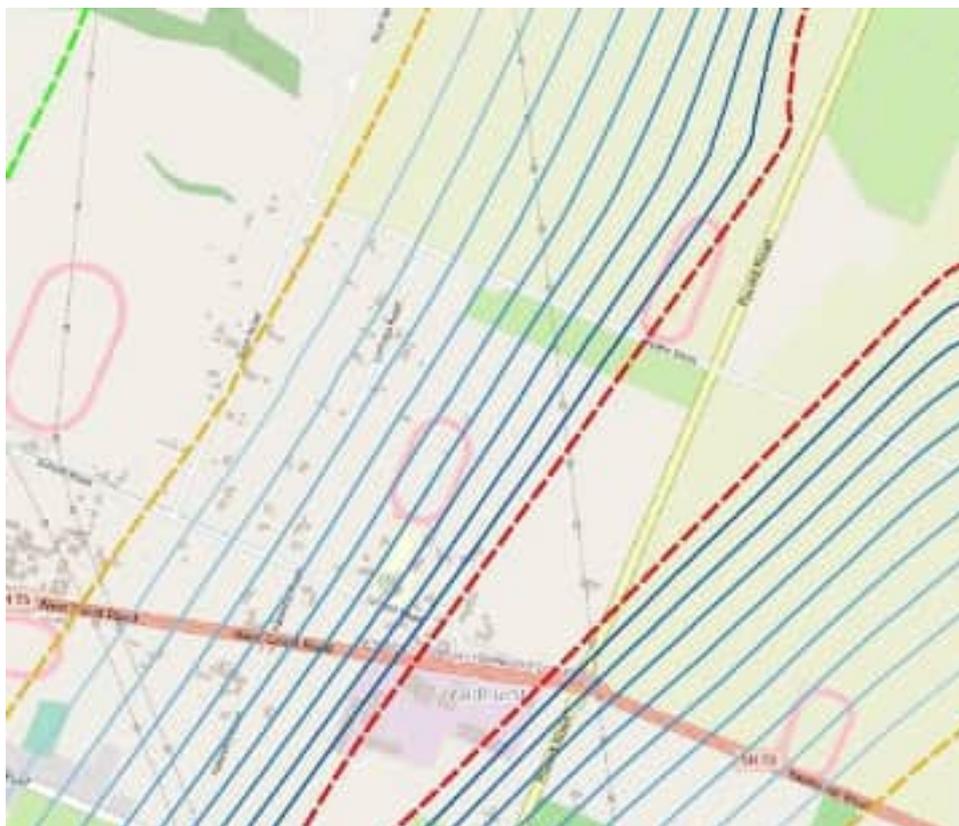


Figure 3 shows [REDACTED] Road in relation to the 65 dB L_{dn} boundary (red) and the 55 dB L_{dn} boundary (yellow). The blue overlaid lines represent the 56 to 64 dB L_{dn} noise contours in one decibel increments.

[REDACTED] Road sits within the 56 dB L_{dn} and 57 dB L_{dn} noise contours.

This means that when Christchurch Airport is operating at its ultimate capacity, [REDACTED] Road is expected to be exposed to a noise level of between the 56 dB L_{dn} and 57 dB L_{dn} .

In short, the District Plan noise contours can be interpolated to determine an effective noise limit at [REDACTED] Rd of 57 dB L_{dn} .

Single event noise levels at [REDACTED] Rd from narrow body jets such as the Airbus A320 are in the range of 70 – 80 dB L_{Amax} for departures and 55 – 65 dB L_{Amax} for arrivals.

3. DMAPS' impact on noise environment at [REDACTED]

To establish the current noise environment at [REDACTED] Road, MDA used internationally recognised noise modelling software, AEDT/INM, from the Federal Aviation Authority in the USA.

The noise levels modelled are specifically for the site at [REDACTED] Road which sits 1.6 km from the main runway's southern threshold and 800 m 'side-on' to runway centreline.

We modelled L_{dn} from all aircraft movements over three months given that is the metric by which Christchurch Airport's adherence to the District Plan rules is measured.

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We also modelled departures on both 'Straight Tracks' and 'DMAPS Tracks'. DMAPS is a departure procedure that was introduced by Airways in March 2020 to improve aviation safety as well as operational and fuel efficiency.

'Straight Tracks' are aligned with the runway centreline and 'DMAPS Tracks' are closer to Coringa Rd due to a 15 degree turn. Coringa Rd is not under the DMAPS' flight track.

Table 1 – Noise levels at 34 Coringa Rd

Description	All departures on Straight Tracks	All departures on DMAPS Tracks	Difference in noise level
L _{dn} from 2020 compliance contours ² busiest 3 months	53 dB L _{dn} ²	55 dB L _{dn} ²	+2.0 dB L _{dn}
L _{dn} from 2021 compliance contours ³ busiest 3 months	51 dB L _{dn} ³	53 dB L _{dn}	+2.1 dB L _{dn}

This shows a small and insignificant increase in noise level (circa 2 dB L_{dn}) due to the DMAPS departures. The model also shows that a single event level for a DMAPS departure is approximately 2 dB L_{Amax} higher than for a straight departure. This is a small increase that is acoustically insignificant.

4. Christchurch International Airport's compliance with the district plan noise rules

Rule 6.1.6.2.5 of the operative Christchurch District Plan sets a noise limit for the airport of 65 L_{dn} at the 65 dB L_{dn} Air Noise Compliance Boundary.

MDA prepared all the Annual Aircraft Noise Contours (AANC) provided to CCC and can confirm they all comply with Rule 6.1.6.2.5. This includes those for 2021 when the DMAPS departures began. We are confident DMAPS departures do not cause a breach of the noise rules.

With respect to [REDACTED] Road, the noise levels for 2020 and 2021 were below the effective noise limit of 57 dB L_{dn} for the site.

We are therefore confident that Christchurch International Airport is fully compliant with the Christchurch District Plan's Aircraft operational noise rules.

About Marshall Day Acoustics

Founded in Auckland in 1981, Marshall Day Acoustics is one of the world's largest and most experienced acoustic engineering firms.

With more than 90 staff throughout New Zealand, Australia, China, Hong Kong and France, we have more than 30 years' experience in aviation. Our expertise is sought by planning authorities, international airports, military bases and regional airports.

Our capabilities include:

² DMAPS commenced in March 2020, at the end of the busiest 3 months of 2020 (January to March). These L_{dn} calculations are based on theoretically moving all departures onto either straight tracks or DMAPS to demonstrate a comparable difference.

³ DMAPS was operating in the busiest 3 months of 2021 (March to May). This L_{dn} calculation is based on theoretically moving all departures from DMAPS to straight tracks to demonstrate a comparable difference.

Environmental: complex noise modelling, validation and refinement studies; noise contour design; impact assessment including the generation of community noise exposure statistics; aircraft noise emission testing, stakeholder engagement and community consultation; and policy support.

Monitoring: short-term and permanent noise monitoring systems; advanced aircraft noise detection software; supply, installation and data management; and cloud-based integration of flight track and noise data.

Building: façade design to control noise intrusion, room acoustics and PA design for enhanced amenity and speech intelligibility; services noise control; and design for privacy and separation.

23 July 2023

huihuimai@graterchristchurch.org.nz

Dear Sir(s) / Madam(s)

Consultation: Greater Christchurch Spatial Plan (Draft for Consultation)

This submission is related to numerous residential concerns regarding infrastructure current and future impacts, upon the health and wellbeing of our community. In particular (but not limited to):

Part 1: Areas to Protect, Avoid and Enhance (within stated plan above)

Area to Protect - Local Community

- Yaldhurst had a population of 1,602 (2018 NZ Census)
- Long-term, established community.
- School (approx. 120 students, **opened 1876**)
- Businesses, church, memorial hall, families, livestock, museum, domain, sports, and culture
- Residents fully aware that they reside within CCC District Plan noise contours – have shaped their lives around these contours.
- Moral and legal expectation that the CCC District Plan applies to all stakeholders.

Submission Information

Managing Impact to People and the historic community

The Christchurch District Plan requires all operational aircraft noise does not exceed 65 dB Ldn at all times within the area outlined in the District Plan (see noise contour image attached).

Current Issues -

1. Excessive ongoing noise – *Recent changes* to the noise environment in the community , and in particular the southern runway resulting in ongoing excessive noise impacting the health and wellbeing of residents.
2. CIAL / CCHL non-compliance to the noise contours within the CCC District Plan. That is, the CIAL air traffic is operating outside of noise contours expressed within the District Plan which is impacting the local community.
 - a. The airport is breaching operational noise levels daily, Ongoing excessive noise levels (including today) **with readings above 65 dB, with some exceeding 90 dB, and over 66dB internally . Impacting health of residents.**
3. Noise Measurement Standard is unfit for the purpose of meeting the district plan and impact to residents.
4. Land development and Noise contours - differs across stakeholders. Christchurch Holdings Ltd (CCHL) CIAL can develop, whilst other landowners can't.

Excessive ongoing noise

- Ongoing issues – raised with CIAL and CCC initially in March 2021
 - The airport is breaching operational noise levels daily, Ongoing excessive noise levels (including today) within the 55dBA and 50dBA noise contours, **with acoustic readings above 65 dB, some exceeding 90 dB, and over 66dB internally (in home), impacting health of residents.**
 - Please refer to three attachments attached. These documents are a few of numerous inactions / and correspondence with CIAL to resolve the matter, without success.
 - No evidence of improvements for residents over extended period.
- Residents are experiencing a significant increase in the level of noise due to change of flight paths, which breaches the noise level anticipated between the 55dBA and 50dBA noise contours, impacting health and wellbeing of residents.
- Following complaints based on excessive increase in noise, I was advised verbally by a manager at Airways NZ Ltd, that there was a due to a change (early 2021) to the flight paths used for the Airport. This has meant, aircraft have been passing directly over her many residents and at a lower height, than was ever the case.
- **CIAL / CCHL non-compliance** to the noise contours within the CCC District Plan. That is, the CIAL air traffic is operating outside of noise contours expressed within the District Plan which is impacting the local community.
 - The airport is breaching operational noise levels daily, Ongoing excessive noise levels (including today) **with readings above 65 dB, with some exceeding 90 dB, and over 66dB internally . Impacting health of residents.**
- **Noise Measurement Standard** - needs to be changed, **and/or** its application for CIAL.
 - Airport noise measurements and standard is unfit for purpose of meeting district plan requirements and minimising impact to community.
 - **65bBA should be based on instantaneous noise, not averaged over 24hours((including period of low noise)**
 - **Current standard cannot be breached by CIAL. Therefore, noise complaints have/and never will be resolved if this standard is utilised in the current form.**
 - Residents are gathering expert acoustic opinion on the standard and its application.

Noise Contours - Current Restraints to residents

- Noise constraints impact how residents can use or develop their land. However , there is a commensurate duty on the Airport to also abide the rules in the District Plan
- CIAL can develop their land within the noise contours.

Ongoing Actions to address issues – March 2021 – ongoing (2+yrs)

- Noise issues and impacts on health - raised with CIAL and CCC initially in March 2021
 - The airport is breaching operational noise levels daily, Ongoing excessive noise levels (including today) **with readings above 65 dB, with some exceeding 90 dB, and over 66dB internally . Impacting health of residents.**
 - No evidence of improvements for residents over extended period.

- Please refer to three attachments attached. These documents are only three of numerous inactions / and correspondence with CIAL to resolve the matter, without success.
- We (residents) have extensive information regarding this ongoing issue, such as meeting documents, letters, and emails. For simplicity of this submission, I haven't provided this information, however, please assume that this information is inclusive and can be provided when requested / later.
- Many residents, including me, are concerned about retaliation of the CIAL and CCC because of ongoing habitual rogue behaviours against residents seeking to address this issue.

Submission Requests

1) Compliance by all stakeholders to Noise Contours

- Reinstate flight paths as expressed within the CCC District Plan
- Flights within 65db noise contours for take-off and landing
- CIAL to operate within noise contours, during take-off and landing. Reinstate original flight exit on southern runway to keep within 65dBA contours in District Plan

2) Noise standard Measurement - needs to be changed, and/or its application for CIAL.

- Airport noise measurements and standard is unfit for purpose of meeting district plan requirements and minimising impact to community.
- 65bBA should be based on instantaneous noise, not averaged over 24hours(including period of low noise)
- Current standard cannot be breached by CIAL. Therefore, noise complaints have/and never will be resolved if this standard is utilised in the current form.
- Residents are gathering expert acoustic data.

3) Spatial / District Plan – application for all stakeholders equally

- That is, land development and usage equal to all parties.
- For example, CIAL / CCHL able to develop land (within contours) that other landowners can't!

Future Involvement

We (residents) have extensive information regarding this ongoing issue, such as meeting documents, letters, and emails. For simplicity of this submission, I haven't provided this information, however, please assume that this information is inclusive and can be provided when requested / later.

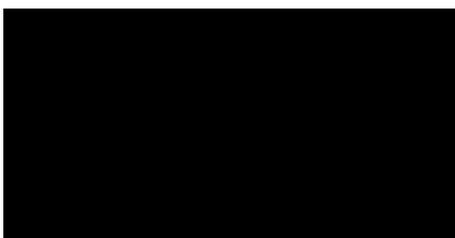
Can you please add my contact details below for future involvement in hearings, webinars, community events and/or information events etc. I can forward this onto residents.

- Please keep the personal information confidential.

- My neighbours have challenged the situation and indicated that they have not taken things further primary for fear of being singled-out (retaliation), as their concerns being constantly dismissed. They are supporting me in this submission.

We are merely seeking the CIAL to comply with the noise contours within the district plan and therefore improve the health and wellbeing of the community.

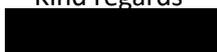
Contact details (confidential)



Please forward the information to Canterbury Regional Council Airport committee.

Look forward to hearing from you.

Kind regards



Noise Limits - Aircraft Operations

Aircraft operational noise limits are set in rule 6.1.6.2.5 (a) (i):

"Noise from aircraft operations shall not exceed 65 dB Ldn outside the 65 dB Ldn Air Noise Compliance Contour shown in Figure 1, other than as provided for in Rule 6.1.6.2.5 (a) (ii)."

Figure 1: Map of 65 dB Ldn Air Noise Compliance Contour



insert from rule 6.1.6.2.5 (a) (i) in the Christchurch District Plan.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 21/07/2023

First name: Margo **Last name:** Perpick

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Momentum Land Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Why:

refer to the attached submission from Momentum Land Limited

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Why:

refer to the attached submission from Momentum Land Limited

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Why:

refer to the attached submission from Momentum Land Limited

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Why:

refer to the attached submission from Momentum Land Limited

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Why (please specify the Priority Area):

refer to the attached submission from Momentum Land Limited

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Why:

refer to the attached submission from Momentum Land Limited

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

refer to the attached submission from Momentum Land Limited

Attached Documents

File
Economic Assessment of Proposed Retirement Village in Kaiapoi - Insight Economics Report
Attachment 1 - South Kaiapoi Block
Submission on Draft Greater Chch Spatial Plan -Momentum Land Limited



Final Report: 18 July 2023

Economic Assessment of Proposed Retirement Village in Kaiapoi

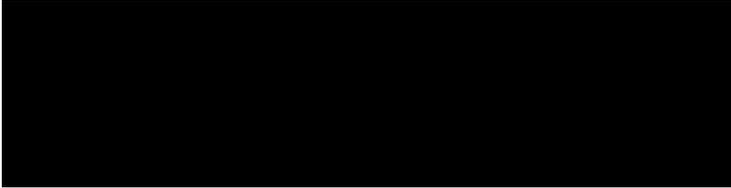
Prepared for: **Momentum Land Limited**

Authorship

This document was written by Fraser Colegrave, Tom Winter, and Danielle Chaumeil.

Contact Details

For further information about this document, please contact us at the details below:

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1. Executive Summary

Momentum Land Limited (MLL) owns rural-zoned land on Beach Road, Kaiapoi, which it wishes to develop as a 301-unit master-planned retirement village, comprising independent-living villas and apartments, a care home, and associated community facilities. To assist, this report assesses the likely economic effects of the proposal.

Having identified and described the subject land, we then summarise the current state of the local and district housing market for context. We show that the district's population has grown rapidly in recent years, with this fast growth set to continue well into the foreseeable future. We also show that the number of people aged 70-plus is expected to increase by 170% over the next 30 years to become more than a quarter of the district's future population (up from about 12% today). Consequently, there is a pressing need to provide new housing options that cater directly for the unique needs of this rapidly growing demographic.

Next, we consider the need for the proposal under the National Policy Statement on Urban Development (NPS-UD). We show that the results of the recent Housing and Business Capacity Assessment (HBA) for the Greater Christchurch Partnership are unreliable because they understate demand while overstating likely feasible capacity to meet it. In addition, we note that the new Medium Density Residential Standards (MDRS) are unlikely to have much impact on district dwelling capacity, at least over the short- to medium-term. Accordingly, additional supply, like the proposal, needs to be identified and enabled as soon as possible to meet NPSUD obligations and to ensure that market supply keeps pace with demand (particularly for the fast-growing, older demographic segment).

We also show that the proposal will help the district to meet its medium-term housing bottom line, as identified in the Strategic Directions chapter of its Proposed District Plan (PDP). Consequently, the proposal also satisfies a key criterion for potential early release within the Kaiapoi Development Area.

For completeness, we also assess the possibility of locating the development elsewhere in Kaiapoi. To identify candidate sites, we searched for all properties within Kaiapoi's projected infrastructure boundary that are at least as large as the subject site, which returned nine properties. One of these is owned by the applicant and is already subject to separate development plans, while the other eight are owned by other entities and not currently available for purchase or development. In addition, all other eight sites face binding constraints or limitations that render them unsuitable and/or an inferior location for the proposal. Accordingly, we conclude that the proposal must locate on the subject site.

Finally, we assessed the proposal's likely economic costs and benefits. They include:

- Providing a substantial, direct boost in market supply to meet current and future demand, which will help keep housing as affordable as possible as demand continues to rise;
- Providing a variety of housing options / typologies to meet the needs and preferences of a fast-growing demographic of older people;

- Enabling older people to “age in place” in a purpose-built facility that provides a “continuum of care”, thereby enabling residents to move from independent living into managed care if/when the need arises without the cost and stress of having to move.
- Freeing up housing for more suitable uses, such as larger families or first home buyers;
- Helping to achieve critical mass for various local services that may otherwise not be viable;
- Achieving high levels of infrastructure efficiency, which in turn avoids unnecessary financial risks and costs for the Council while helping to minimise the prices of new homes;
- The economic stimulus of developing the land and constructing the dwellings and onsite facilities that will be enabled there; and
- The ongoing employment sustained onsite, which will in turn help improve district employment self-sufficiency.

Given the strong and enduring benefits of the proposal, and noting the absence of any material economic costs, we support it on economic grounds.

2. Introduction

2.1 Context & Purpose of Report

Momentum Land Limited (MLL) owns approximately 6 hectares of rural-zoned land on Beach Road, Kaiapoi, in the Waimakariri district, where it wishes to develop a 301-unit master-planned retirement village, comprising independent-living villas and apartments, a care home and associated community facilities. To assist, this report assesses the likely economic effects of the proposal.

2.2 Rationale for the Proposal

The Waimakariri District (Waimak) is experiencing strong population growth, which is set to continue well into the foreseeable future. As the district's population grows, so too does its demand for housing. In addition, the district's population is ageing, which creates heightened demand for housing designed specifically for older people.

At the same time, the National Policy on Urban Development (NPS-UD) imposes strong obligations on Councils in high growth areas, like Waimak, to ensure that there is "at least" enough feasible capacity "at all times" to meet ongoing growth in housing demand, including providing a range of options to meet differing needs.

In addition, WDC has further recognised the need to enable sufficient land for additional housing in appropriate locations by creating a bespoke planning process that fast-tracks the conversion of rural land for residential purposes if they meet specific criteria.

Finally, there is an abject lack of available residential land in and around Kaiapoi to meet ongoing growth in demand, including ongoing spill-over from Christchurch City, whose population has fallen over the last two years as some residents there relocate to Waimak and Selwyn in search of a new housing future.

The proposal directly reflects and responds to these market and policy signals by providing a master-planned, housing development for up to 400 residents that not only achieves high densities, but also give effects to a range of local and national strategies and policies.

The remainder of this report works through this rationale to examine the economic merits, and likely effects, of the proposal.

2.3 Structure of Report

The remainder of this report is structured as follows:

- **Section 3** locates and describes the subject land before outlining the proposed development;
- **Section 4** describes the district's population and housing market context;
- **Section 5** considers the need for the proposal under the NPS-UD;

- **Section 6** assesses the proposal against development area criteria for potential early release in the Proposed District Plan (PDP);
- **Section 7** addresses the possibility of siting the development elsewhere in Kaiapoi;
- **Section 8** considers the likely economic costs and benefits of the proposal; and
- **Section 9** provides a short summary and conclusion.

3. About the Proposal

3.1 Site Location & Description

The subject site is located on the northern banks of the Kaiapoi River, less than one km northeast of the Kaiapoi town centre, as illustrated by the yellow outline in the map below. It is bound by Beach Road to the south, residential dwellings to the west, Kaiapoi North School to the north, and an unnamed paper road to the east. The site spans just over six hectares and is predominantly flat. It is currently used for grazing but is otherwise idle.

Figure 1: Location of Subject Site



3.2 Receiving Environment

The subject site is something of an anomaly because it is land-locked by non-rural uses on all side, making it both physically and visually separated from other rural land. This is illustrated in Figure 2 below, which shows the site's immediate receiving environment.

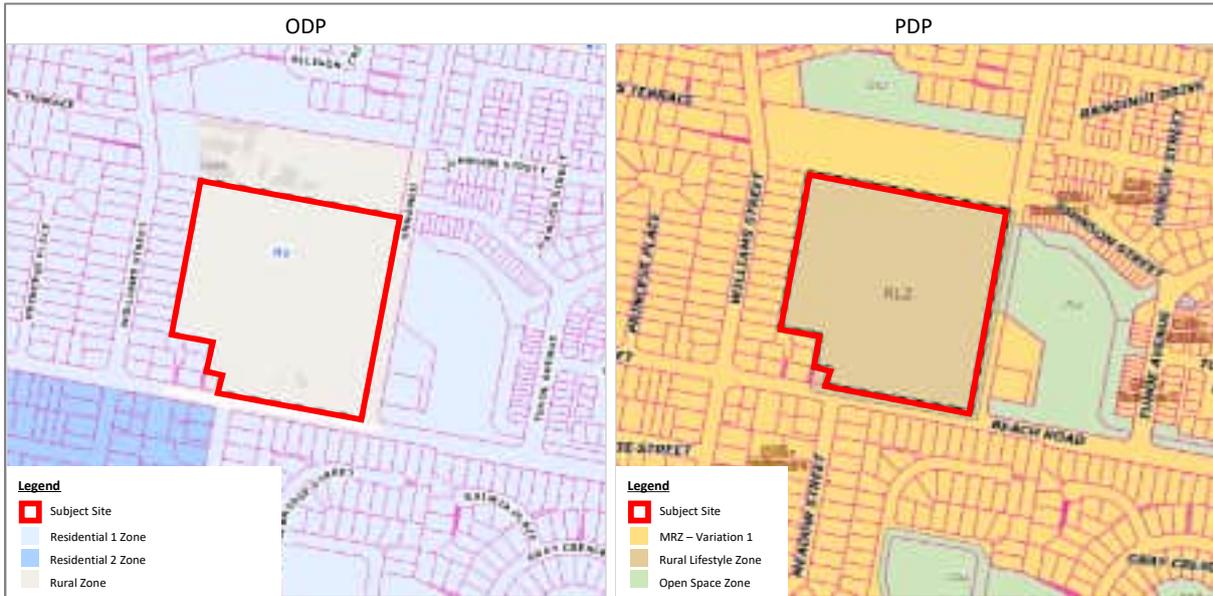
Figure 2: Receiving Environment



3.3 Zoning & Strategic Context

The site is currently zoned Rural under the Waimakariri District Council (WDC) Operative District Plan (ODP), and Rural Lifestyle under the Proposed District Plan (PDP), as illustrated in Figure 3 below.

Figure 3: Zoning of Subject Site Under ODP & PDP



However, the site also falls within the Kaiapoi Projected Infrastructure Boundary (PIB), and is identified as a future residential development area in the Kaiapoi Outline Development Plan. See Figure 4 below.

Figure 4: Location of Site Within Kaiapoi Development Area



The site is also subject to an ongoing submission on the recently notified Variation 1 to the PDP, with the applicant seeking Medium Density Residential zoning.

3.4 About the Proposal

The proposed development is a comprehensive 301-unit retirement village, providing a full continuum of care from active retirees right through to fully-dependent care patients. It has four main elements:

1. 96 single-level villas;
2. 115 independent-living apartments;
3. A care home, comprising 90 rooms / suites and associated medical facilities; and
4. A lodge, with extensive community facilities for residents and guests.

The location of each element is illustrated in Figure 5 below.

Figure 5: Indicative Site Plan



The proposal provides a range of dwellings typologies/sizes to meet varying needs as per Table 1.

Table 1: Indicative Yield by Dwelling Type

Type	Description	# of Units	Share of Units	Average GFA	Share of GFA
Villa	2 Bed	44	15%	111	21%
	2 Bed + Study	40	13%	123	21%
	3 Bed	12	4%	140	7%
Apartment	1 Bed	8	3%	53	2%
	2 Bed	58	19%	79	19%
	2 Bed + Study	43	14%	97	18%
	3 Bed	6	2%	112	3%
Care Facility	Care Room	60	20%	20	5%
	Care Suite	10	3%	67	3%
	Dementia Room	20	7%	20	2%

The 96 single-storey villas span several configurations, with floor areas ranging from 110m² to 140m², while the 115 apartments range from 53m² to 112m². Two-bedroom dwellings are the most common, with a small number of one- and three-bed apartments also proposed.

The care home is set over two levels and comprises 60 care rooms, 20 dementia rooms and 10 larger care suites, plus associated medical and visitor amenities.

The lodge and village green form the social heart of the village, providing a range of amenities and services to residents and their guests. Features are likely to include:

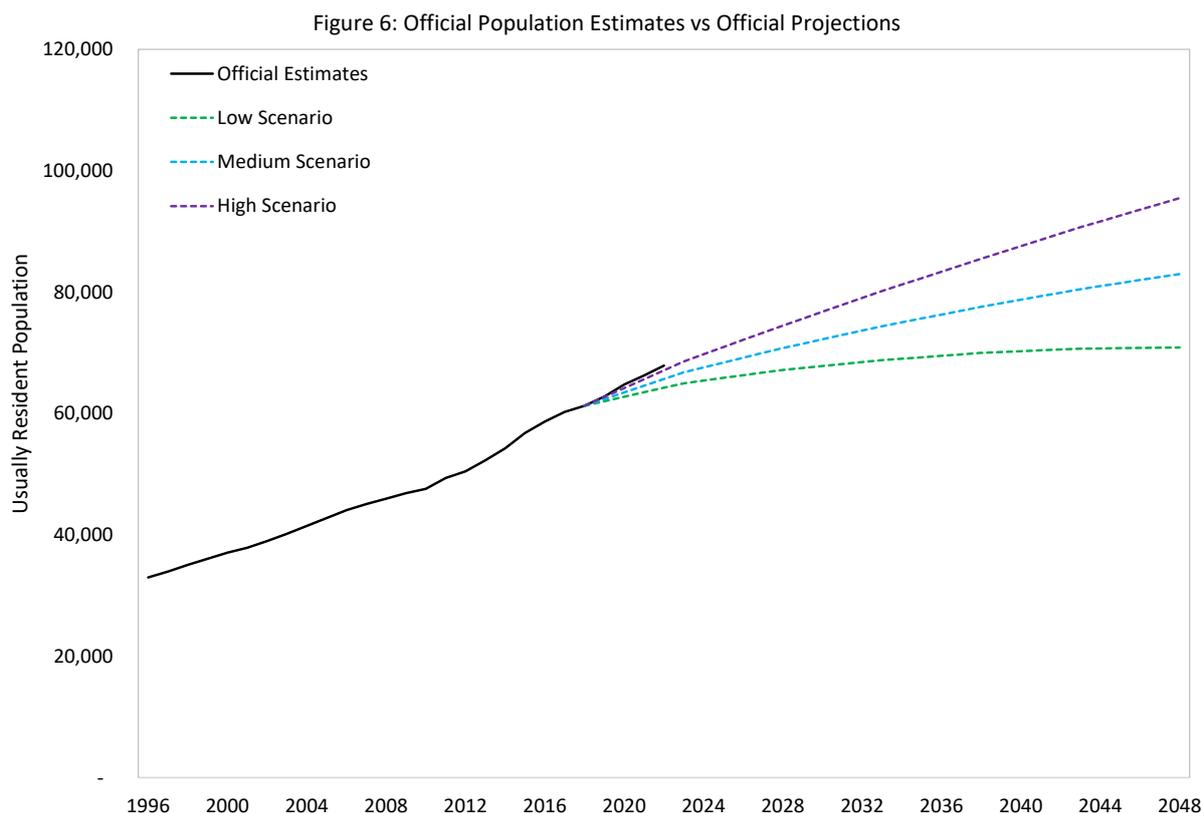
- Lounge
- Reception
- Admin / offices
- Gym
- Massage
- Wellness
- Beauty
- Pool
- Spa
- Library
- Activities room
- Café / bar

4. District Population and Housing Context

This section describes the population and housing to provide context for the proposal.

4.1 District Population Growth

Waimak's population has grown rapidly since the late 1990s, particularly after the earthquakes in 2010/11. This strong growth continues today, with growth continuing to exceed Statistics New Zealand's population estimates for 2022 high population scenario. This is illustrated in the chart below, where the solid black line is the actual/estimated population, and the dashed lines are projections.



In our view, there are two key drivers of the district's sustained high population growth. First, housing in Waimak is still relatively affordable, particularly compared to Christchurch city. Consequently, the tide of relocations from the city into Waimak and Selwyn has continued well after the quakes as people take advantage of the more affordable housing available so close to the city's employment opportunities. A similar pattern is evident in and around Auckland, where high house prices have also pushed people out of the central areas into the relatively more affordable rural fringes.

Second, the Covid-19 pandemic has caused people to seriously reconsider what they really need and want from life, including where they want to live. With the rapid uptake of working from home and the newly emerging "hybrid working model" taking hold, many people are now even more willing to trade off a slightly longer commute in exchange for living in areas that better meet their day-to-day needs. For the Waimakariri district, this has been strengthened by recent State Highway improvements, which have made commuting into the city for work and leisure quicker and easier than

before. Similar trends are also playing out in the urbanised areas of Selwyn district, whose official population projections also continue to outpace the high growth projection.

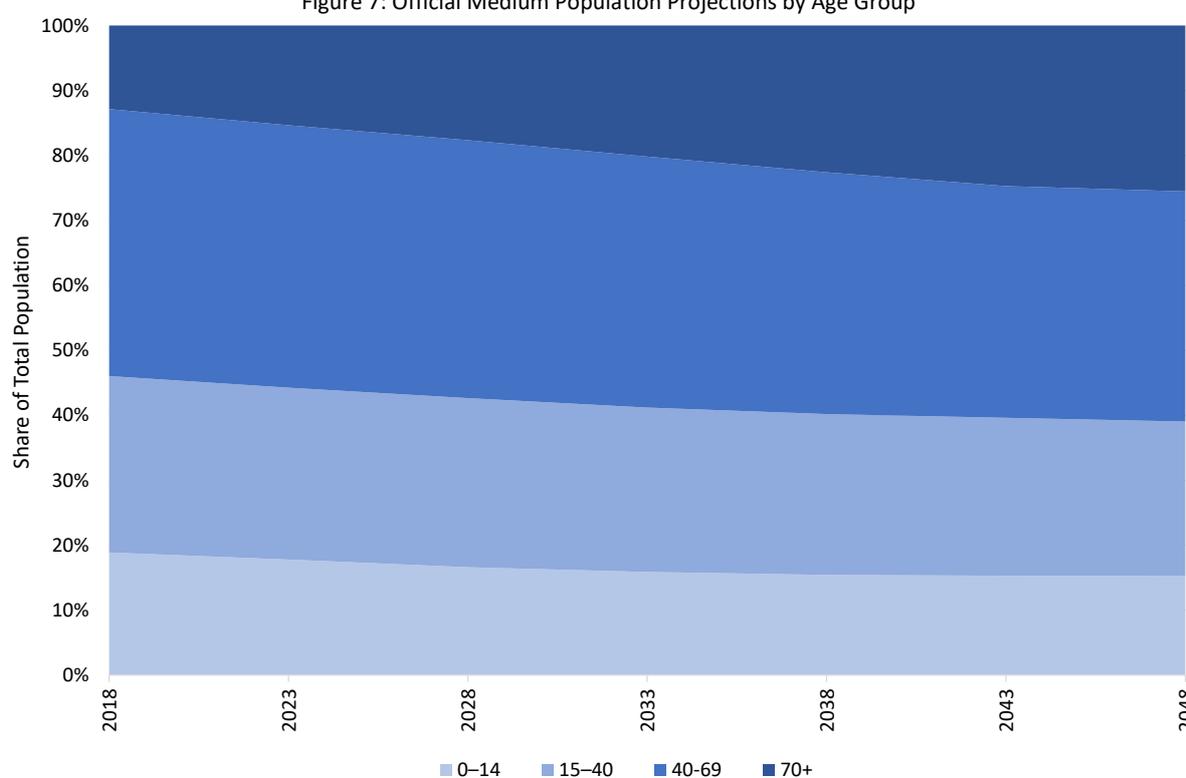
4.2 Ageing District Population

Not only is Waimak's population growing strongly, but it is also getting older, with a higher share of older people being met by shrinking shares of younger people. According to the official projections underlying the graph above, these trends are expected to accelerate. Table 2 and Figure 7 below illustrate this point by unpacking the district's official medium population projection by age group.

Table 2: Official Medium Population Projection by Age Group

Year	0–14	15–39	40–69	70+	Total
2018	11,590	16,660	25,210	7,880	61,340
2023	11,880	17,670	26,990	10,240	66,780
2028	11,770	18,420	28,110	12,480	70,780
2033	11,830	18,820	28,750	15,010	74,410
2038	11,970	19,230	28,880	17,520	77,600
2043	12,330	19,550	28,690	19,890	80,460
2048	12,660	19,720	29,390	21,180	82,950
30-yr change	1,070	3,060	4,180	13,300	21,610
30-yr % change	9%	18%	17%	169%	35%
CAGR	0.3%	0.6%	0.5%	3.4%	1.0%

Figure 7: Official Medium Population Projections by Age Group



According to the official population projections above, the number of district residents aged 70 plus is set to grow by 13,300 over the next 30 years – an increase of nearly 170%. This growth rate is drastically higher than any other age bracket. Consequently, older people will account for an

increasing share of the district population over time. In fact, the proportion of district residents aged 70 plus is expected to double from 13% today to 26% by 2048.

4.3 Projected Dwelling Demand

In 2021, Livingston and Associates were commissioned to analyse demand in the Greater Christchurch housing market to help inform Council planning processes¹. Their report is comprehensive and, amongst other things, includes household projections for Kaiapoi and the rest of the district. These are shown in the table below.

Table 3: Household Projections (from Livingston & Associates Report)

Year	Kaiapoi	Rest of District	Total
2021	5,490	20,750	26,240
2024	5,900	22,460	28,360
2031	6,550	26,140	32,690
2041	7,310	30,720	38,030
2051	7,880	34,310	42,190
Change	2,390	13,560	15,950
Annual Growth Rate	1.2%	1.7%	1.6%

According to Table 3, the number of households in Kaiapoi will increase by nearly 2,400 between 2021 and 2051 (from 5,490 to 7,880). This represents an annual average growth rate of 1.2%. Slightly higher growth is forecast in the rest of the district, where the annual growth rate is forecast to be 1.7%.

The Livingstone and Associate report also notes that the district's demography will change significantly over the next 30 years, with the average age of residents projected to increase significantly (as discussed above). This, in turn, will alter the types and sizes of dwellings required to house the future population. For example, nearly all the projected growth in households tabulated above represents couples without children or people living alone, as illustrated in Table 4 below.

Table 4: Waimakariri Household Projections by Household Composition (from Livingston & Associates Report)

Year	Couples without children	Couples with children	One parent household	One person household	Other household types	Total
2021	10,380	7,560	2,220	5,600	560	26,320
2024	11,380	7,910	2,320	6,200	600	28,400
2031	13,220	8,660	2,520	7,600	600	32,590
2041	15,600	9,540	2,930	9,220	700	37,980
2051	17,440	10,340	3,160	10,560	700	42,200
Change	7,060	2,780	940	4,960	140	15,880
Annual Growth Rate	1.7%	1.0%	1.2%	2.1%	0.7%	1.6%

These accelerating demographic trends mean that smaller dwellings located near essential services will become an increasingly component of the district's housing future.

¹ "Housing Demand and Need in Greater Christchurch", Livingston and Associates Ltd, July 2021

4.4 Existing Dwelling Stock

To gain a better understanding of Kaiapoi's existing dwelling stock, we used Core Logic's Property Guru tool to profile all existing dwellings on sections of one hectare or less. Table 5 presents the results.

Table 5: Summary of Existing Kaiapoi Dwelling Stock

Summary Statistics	Value
Number of Dwellings	4,455
Avg Dwelling GFA (m ²)	180
Avg Section Size (m ²)	710
Avg No. of Bedrooms	3.3
Avg Floor Area Ratio	0.25
Average Property Values	Value
Capital Value	\$720,000
Decade Built	Share
Pre-1950	6%
1950 - 1959	3%
1960 - 1969	7%
1970 - 1979	9%
1980 - 1989	4%
1990 - 1999	15%
2000 - 2009	11%
2010 - 2019	36%
2020 - 2029	5%
Unknown	4%

According to Table 5, the average dwelling in Kaiapoi has 180m² of floorspace on a 710m² section, with an average of 3.3 bedrooms. Around half of all Kaiapoi dwellings were built since 2000, with more than a third built between 2010 and 2020. The average capital value is \$720,000.

4.5 Recent Development Patterns

We also used Core Logic's Property Guru tool to identify all dwellings built and sold in and around Kaiapoi since 2010 to identify their location within the township. These recently built and sold dwellings are illustrated by the red dots in the map below, with the subject site overlaid for context.

Figure 8: Location of New Dwellings Built and Sold since 2012 in Kaiapoi

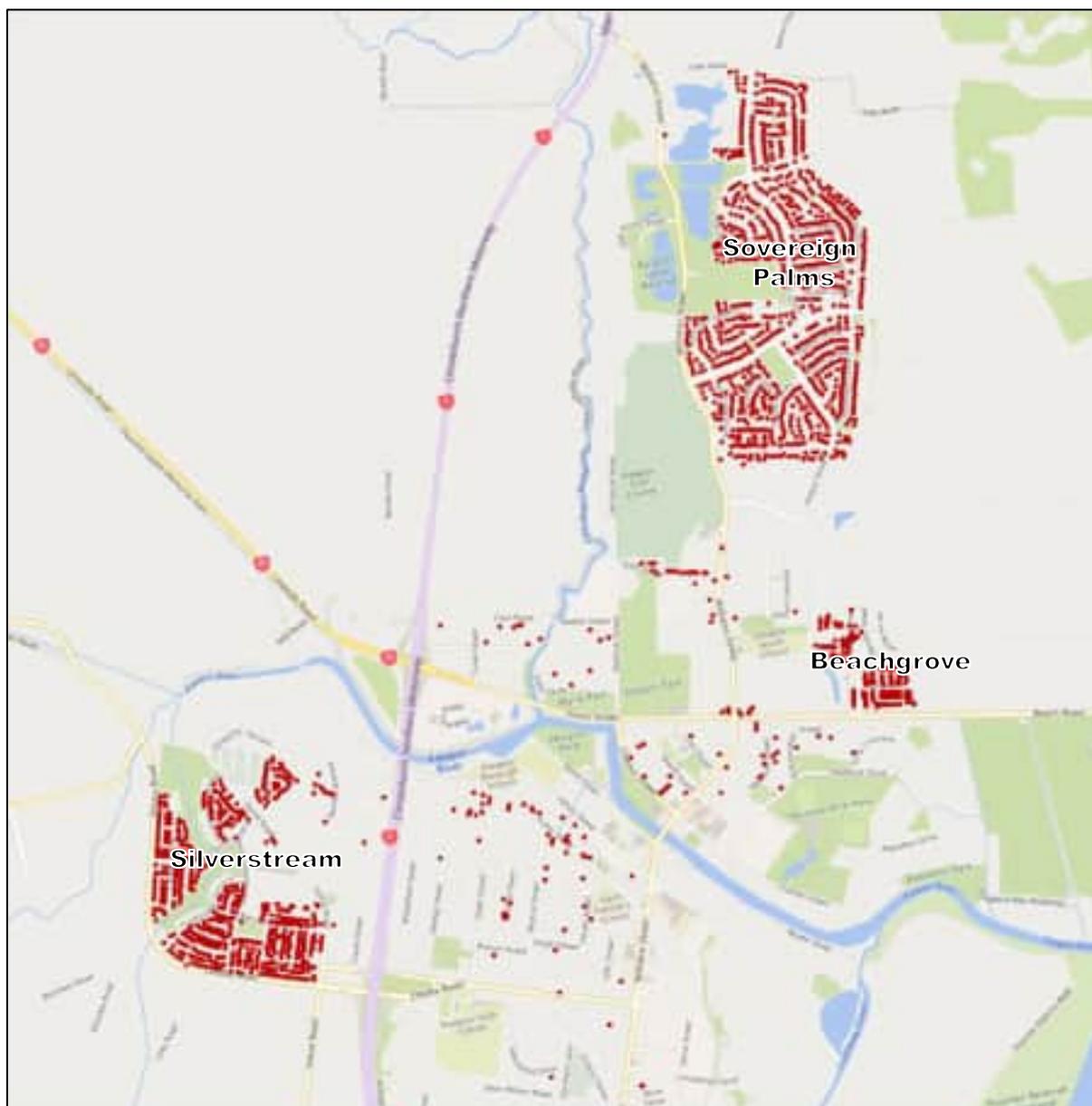


Figure 8 shows that virtually all dwellings built and sold in Kaiapoi recently were in three greenfield areas dotted around the edge of the township, namely:

1. Sovereign Palms, which is to the north-east and appears to be the largest contributor to new dwelling supply since 2010;
2. Silverstream, which is located to the west of the township on the other side of SH1, and appears to be the second largest growth area since 2010; and
3. Beachgrove, which is just northeast of the town centre and is directly adjacent to the subject site. It was the third largest growth area in recent times.

This high concentration of new development on the urban periphery differs from many other areas of New Zealand, where new dwellings tend to be spread more evenly across new and existing urban

areas. It likely reflects the challenging economics of intensification in provincial areas like this, where land values are too low to make it viable, coupled with the losses of red-zoned land after the quakes.

Herein lies an issue for the district, and for Kaiapoi more specifically. Currently, there is little greenfield land available for development, with the Beach Grove development (just east of the subject site) being the only significant undeveloped land left in Kaiapoi. According to MLL, whose sister company is developing Beachgrove, 300 lots have already been developed there with a further 100 currently underway. This just leaves a further 200 lots to be developed in 2023/24, after which there will be no more greenfield land to accommodate ongoing growth in demand for living in Kaiapoi. Accordingly, new areas like the subject site need to be opened up as soon as possible to keep pace with demand.

5. Need for the Proposal Under the NPS-UD

This section assesses the need for the proposal according to the National Policy Statement on Urban Development (NPS-UD).

5.1 Context

The NPSUD came into effect in August 2020. Like its predecessor, the NPSUDC 2016, the NPSUD requires Councils in high growth areas to provide (at least) sufficient development capacity to meet expected future demand for additional dwellings over the short-, medium-, and long-term. In addition, the NPSUD imposes strict monitoring and reporting requirements to ensure that any likely capacity shortfalls are identified and rectified as soon as possible.

The NPSUD's requirements for monitoring and providing development capacity vary across three tiers, with the strictest requirements imposed on Councils in tier 1 urban environments. These represent the highest-growth areas, where capacity shortfalls have historically been the most acute.

Waimakariri District comprises part of the Greater Christchurch Tier 1 urban environment and is therefore required under the NPSUD to complete a detailed housing and business development capacity assessment (HBA) every three years. The HBA synthesizes a raft of information about the supply and demand for new dwellings to ensure that sufficient capacity is being provided in the right places and at the right time to keep pace with demand through to the long term.

5.2 2021 Greater Christchurch HBA

On 30 July 2021, the Greater Christchurch Partnership (GCP) published its latest HBA for its three partner Councils: Christchurch City, Selwyn District, and Waimakariri District.²

The table below summarises the estimated feasible capacity and projected future demand for additional dwellings in Waimakariri according to the latest HBA for three different capacity scenarios:

- Excluding future development areas (FDAs) in Rangiora and Kaiapoi;
- Including Rangiora and Kaiapoi's FDAs at a density of 12.5 hhlds/hectare; and
- Including Rangiora and Kaiapoi's FDAs at a density of 15 hhlds/hectare.

² <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Greater-Christchurch-Housing-Development-Capacity-Assessment-July-2021.pdf>

Table 6: Waimakariri District Feasible Capacity and Dwelling Demand in Latest HBA

Scenario 1: Excluding Future Development Areas (FDAs)			
Timeframes	Feasible Capacity	Demand incl buffer	Surplus/Shortfall
Short Term	2,273	1,833	440
Medium term	2,273	5,410	-3,137
Long term	2,273	13,059	-10,786
Scenario 2: Including Future Development Areas (FDAs) @ 12.5 hh/ha			
Timeframes	Feasible Capacity	Demand incl buffer	Surplus/Shortfall
Short Term	2,273	1,833	440
Medium term	7,673	5,410	2,263
Long term	12,192	13,059	-867
Scenario 3: Including Future Development Areas (FDAs) @ 15 hh/ha			
Timeframes	Feasible Capacity	Demand incl buffer	Surplus/Shortfall
Short Term	2,273	1,833	440
Medium term	9,123	5,410	3,713
Long term	13,642	13,059	583

Table 4 shows that, when the FDAs in Rangiora and Kaiapoi are excluded, the latest HBA reveals a significant shortfall in feasible district dwelling capacity over the medium-term (3 to 10 years) and long-term (10 to 30 years). When the FDAs are included, however, the medium-term shortfall disappears leaving only a small long-term deficit in the lower density scenario, or a small surplus if the higher density target of 15 households/hectare is met.³

5.3 Critique of HBA Methodology & Conclusions

While the HBA's dwelling supply/demand figures imply no short-term need to provide additional capacity to meet demand, there are several compelling reasons why this is unlikely to be the case.

5.3.1 NPSUD Requirements are Minima Not Targets

First, the capacity requirements set out in the NPSUD are minima, not targets, and they must be achieved "at all times". Thus, even if a Council appears to have "sufficient" capacity to meet demand, that does not negate the benefits of providing more. The opposite is generally true. Thus, all other things being equal, the greater the capacity provided, the greater the degree of land market competition and the more efficiently that the market operates (for the wider benefit of the community). Put slightly differently, the risks of an oversupply typically pale in comparison to those of an undersupply if the cost and risk of providing the necessary infrastructure can be shifted onto developers, which is normally the case for greenfield developments like the proposal.

5.3.2 Demand Estimates Appear Low

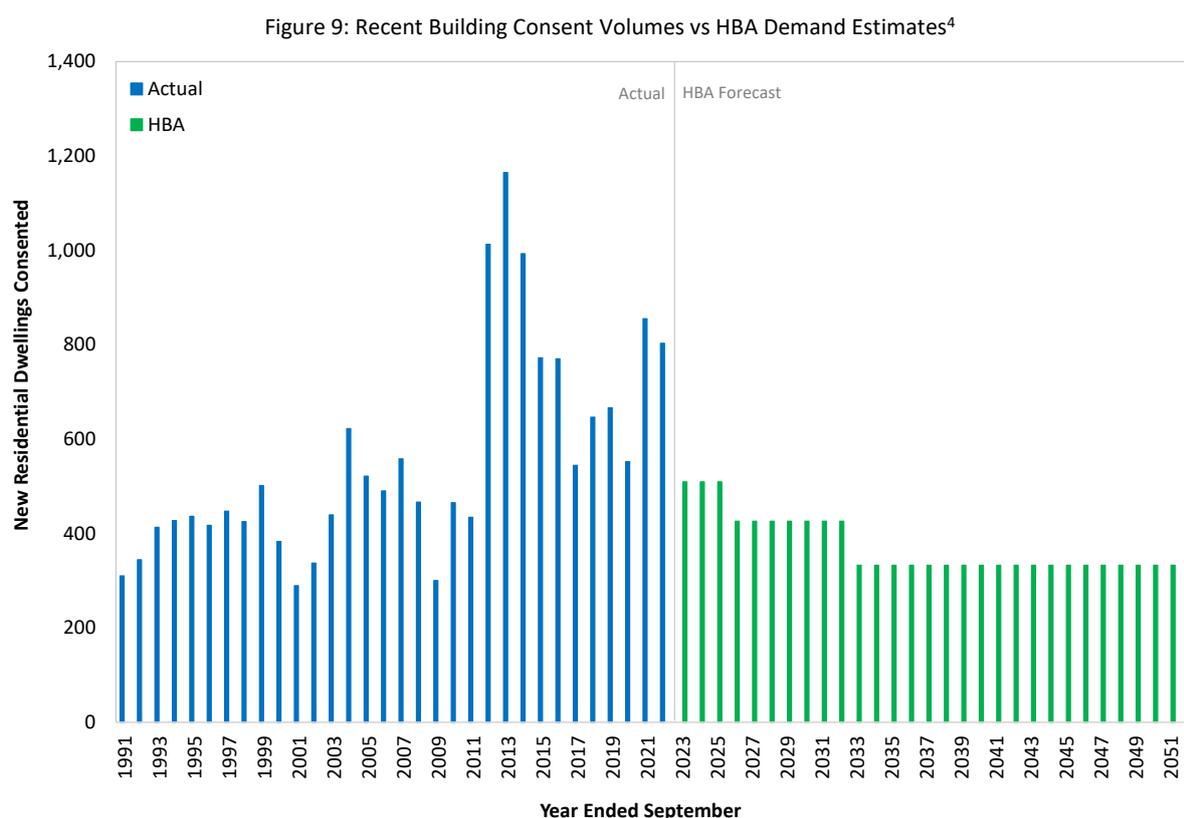
Second, the Council's estimates of future dwelling demand appear too conservative. Specifically, the HBA assumes short-term demand for only 1,833 new dwellings over the next three years, and a medium-term demand for only 5,410 over the next 10 years (both including 20% competitiveness

³ That said, and as explained below, development in the Rangiora and Kaiapoi FDAs must be excluded from the short- and medium- term capacity figures as they do not meet NPSUD criteria for inclusion.

margins). These equate to annual run rates of about only 610 dwellings over the short term, and 540 over the medium term.

To put these in context, more than 610 new consents have already been granted in the first nine months of 2022, which equals the annual short-term estimate including competitiveness margins, but there are still three months to go.

Figure 9 provides more details. It compares the HBA's projected dwelling demand to 2051 excluding competitiveness margins (the green bars) to actual district building consents granted since 1991 (the blue bars).



In our view, the HBA's forecasts of short- to medium-term future are conservative relative to recent trends and thus are likely to understate the true extent of future demand. For example, district building consents have averaged more than 700 per annum over the last five years, which is 38% higher than the HBA's short term demand estimate excluding competitiveness margins.

Similarly, district building consents have averaged more than 570 per annum over the last 30 years, which is 51% higher than the HBA's long term demand estimate excluding competitiveness margins.

We also note that the demand projections included in the HBA are materially lower than the household projections in the Livingstone report mentioned earlier. According to that document, the number of district households is expected to increase by 13,560 over the next 30 years. Once the long-

⁴ Building Consent data was retrieved from <http://infoshare.stats.govt.nz/>

term NPS-UD competitiveness margin of 15% is added to that figure, the Livingstone report generates a long-term demand for nearly 15,600 extra households. This is nearly 20% higher than the HBA.

5.3.3 Feasible Capacity Assumptions Are Unsound

Not only does the HBA for Waimakariri adopt relatively low estimates of demand, but its estimates of feasible capacity (to meet that demand) may be overstated. There are several issues at play here, which we now work through one by one.

First, when calculating feasible capacity in existing greenfield areas, the modelling assumes that 75% of the land will be available for development.⁵ In FDA areas, it assumes that all land will be available for development.

As discussed in the appendix, which critiques several aspects of the feasible capacity modelling completed for the district, we consider these assumptions unrealistic, and instead recommend the following yield assumptions based on recent studies and discussions with developers:

1. 65% for existing greenfield areas; and
2. 85% for the FDAs.

Another issue, which is also discussed in the appendix, is the HBA's assumption of an inexplicably low profit margin on house construction. This contradicts MBIE's official guidance for feasibility modelling, and further distorts the HBA's feasible capacity estimates for the district.

Finally, the HBA includes the FUDAs in Rangiora and Kaiapoi as part of its medium-term capacity. However, clause 3.2 of the NPSUD requires that for capacity to be 'sufficient', it must be (among other things) 'plan enabled.' Clause 3.4 of the NPSUD further states that development is 'plan-enabled' for housing if, in relation to the medium term, it is on land zoned accordingly for housing under either an operative or proposed district plan. This is not the case for the FUDAs in Rangiora and Kaiapoi so they cannot be considered in any medium-term development capacity assessment.

5.3.4 Impacts of the NES on Freshwater

Not only will some greenfield land be foregone to roads, reserves, and other forms of enabling infrastructure, but other areas will likely also be precluded from development by the NES on freshwater (which became operative in August 2020). This has fundamentally affected the development potential of numerous greenfield sites across the country, and Waimak appears to be no exception. Indeed, the eastern parts of the district, where virtually future development will occur, are low-lying and flood-prone, so significant chunks of land previously considered suitable for development may no longer be so.

5.3.5 HBA Inputs and Outputs Now Obsolete

In addition to the various issues raised above, we also note that three of the key inputs used to estimate feasible capacity are now out of date, and thus so too are its outputs. To understand the

⁵ See page 42 of the HBA (30 July 2021).

magnitude of this issue, it is important to first understand how feasible capacity is estimated over the long-term (10 to 30 year) horizon of the NPSUD.

In short, the HBA projects forward current house prices and construction costs (as at late 2020) based on expected future growth rates to see how project viability will change over time. And, because sales prices are usually expected to grow quicker than development costs, the quantum of feasible capacity grows as the gap between costs and revenues increases over time. This is also naturally reflected in the resulting feasible capacity estimates, which are much higher over the long term than the short- or medium-terms.

Herein lies the problem. Since the analysis underpinning the 2020/1 HBA was completed in late 2020 or early 2021, district house prices have started to fall, while construction costs have shot up due to pandemic-related supply chain issues and tight labour market conditions. At the same time, interest rates have begun to rapidly recover from their historic lows, which seriously affects the profitability of development

The three charts below show how district house prices, national construction costs, and the OCR (respectively) have changed since the HBA was completed. Clearly, any long-term capacity figures based on extrapolations of the trend to late 2020 or early 2021 are no longer valid, and hence neither are the feasible capacity estimates derived therein.

Figure 10: District Median House Price Trends Since 1993

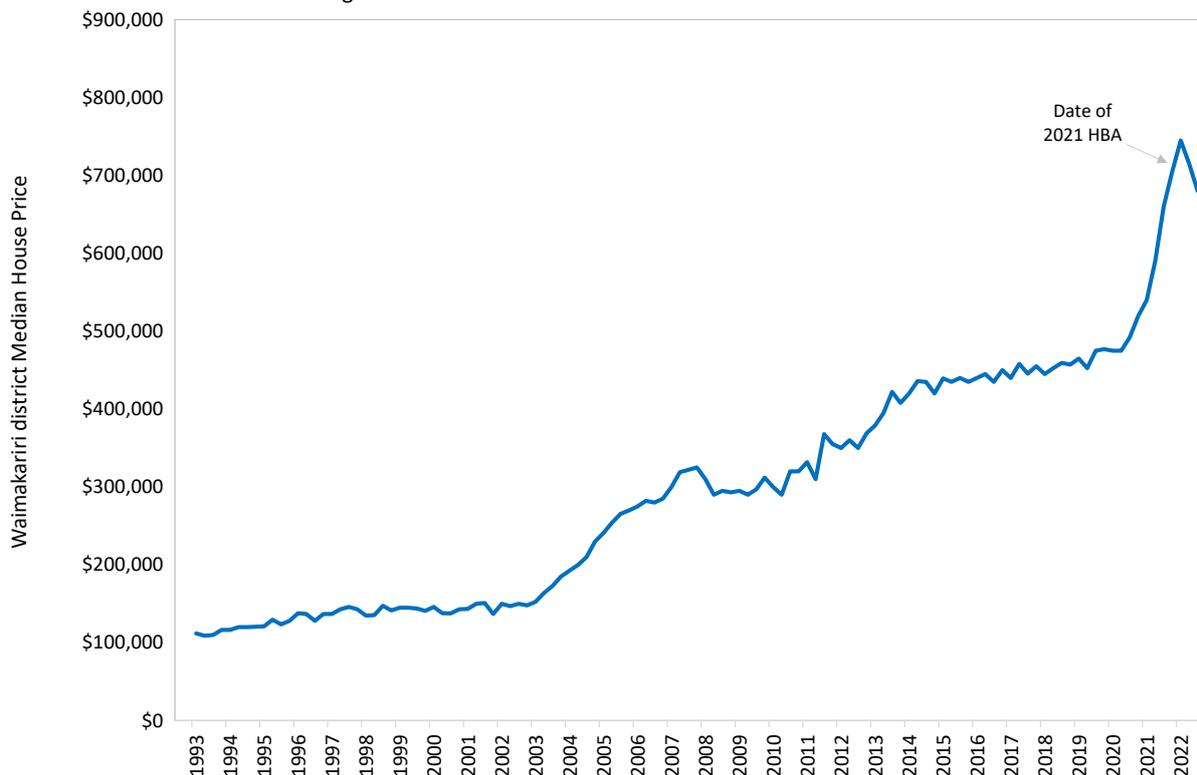


Figure 11: Annual Changes in Residential Building Construction Costs since 1995

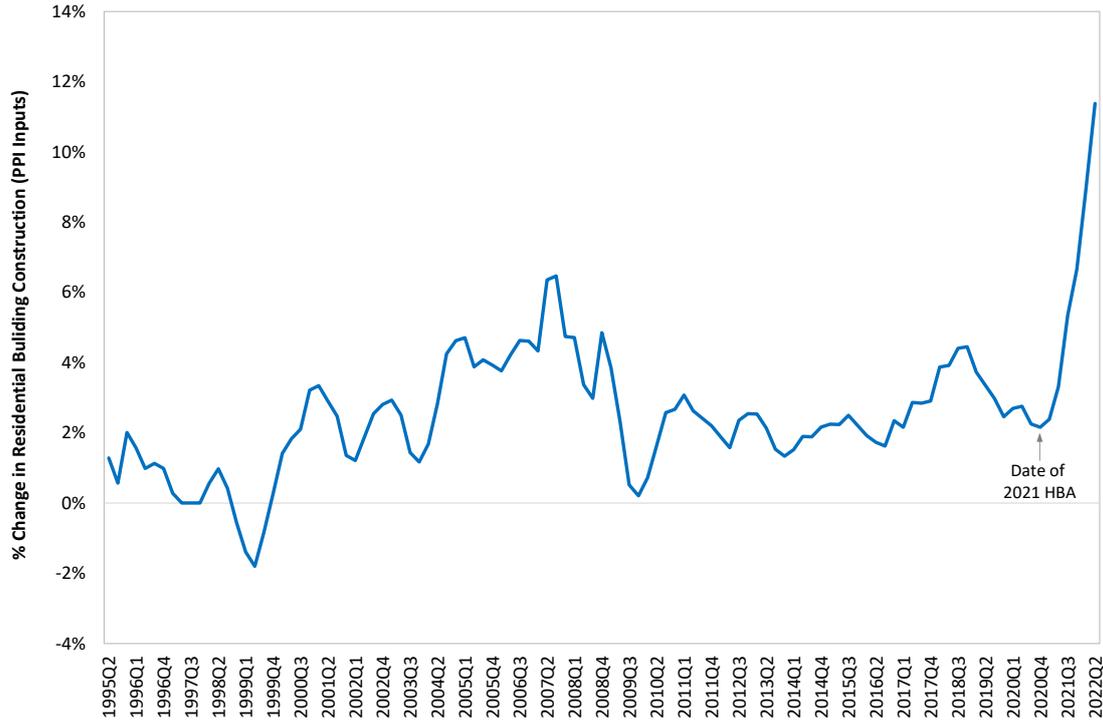
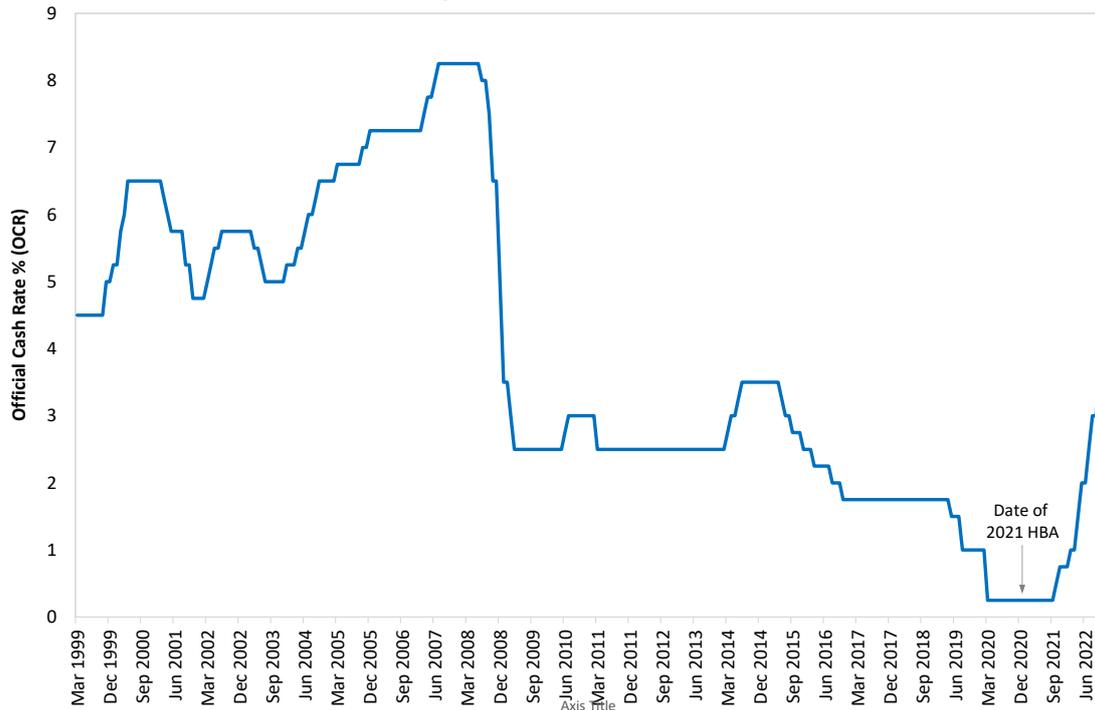


Figure 12: Official Cash Rate



5.3.6 Feasible Capacity vs Market Supply

Not only is feasible capacity overstated for the reasons set out above, but there is also a critical difference between feasible capacity, as reported in the HBA, and likely market supply (which is ultimately tasked with meeting increased demand over time).

In short, while feasible capacity is an interesting metric, it should not be confused with market supply. There are several reasons why feasible capacity may not form part of market supply, particularly over the short to medium term. They include:

- **Developer intentions** - some landowners have no clear intention to develop in the short- to medium-term, nor to sell their land to others who may wish to develop it.
- **Tax implications** – greenfield land-owners are liable for taxes on recent land value uplifts caused by rezoning. These taxes are greatest in the first year following the rezoning, but gradually diminish over time and then cease 10 years later. In some cases, efforts to avoid or minimise these taxes could cause land to be withheld from the market for up to a decade.
- **Land banking and drip-feeding** – other landowners intend to develop in future, but are currently withholding supply to capitalise on inevitable land price inflation, while some are drip-feeding supply to maintain prices and hence maximise returns.
- **Site constraints** – the Council’s estimates of likely supply appear to consider only infrastructure as a potential site constraint and therefore overlook other factors that affect developability, such as contamination or awkward site shape/topography. In addition, as discussed in section 6.3 of the HBA, the feasible capacity estimates currently ignore a large range of potential infrastructure constraints (such as power and telecommunications) which are yet to be identified with relevant providers.
- **Operational capacity** – some landowners face operational capacity constraints, which limit the number of new residential lots that they can supply per annum.
- **Financing** – similarly, some landowners face capital/financing constraints that also limit their ability to supply.

Given these various market forces, it follows that actual market supply will only ever be a modest proportion of feasible capacity, and hence that reliance on “just enough” feasible capacity to meet demand will invariably lead to significant and prolonged market shortages.

5.4 Impacts of Recent MDRS Changes

The HBA-based discussion of dwelling supply and demand just above does not include the potential effects of new medium density residential standards that now have legal effect (under the RMA Amendment Act 2021) and will apply to certain residential zones in the district. Thus, to ensure that our assessment of district dwelling supply and demand is as robust as possible, we recently considered how the conclusions above might change due to the new MDRS provisions.

To begin, we clarify that the new rules enable up to three dwellings of three storeys to be built per lot subject to meeting various development standards, including building heights, setbacks, coverage ratios, and recession planes.

At first glance, the pending ability to construct three dwellings per lot sounds like a lot of additional capacity being enabled. And, *in theory*, it is. However, in our view, the practical impacts for Waimak are likely to be muted, particularly over the short to medium term. We now explain why.

First, the new MDRS standards won't have much impact on existing urban areas within the two townships because they are (mostly) already developed. As a result, redevelopment will be unviable over the short to medium term because those sites already contain dwellings that are fit for purpose and have some remaining useful life.⁶

The situation for older homes or empty sections – including those in new greenfield areas – is different because they are not encumbered by buildings with significant remaining useful lives that undermines the viability of redevelopment.

However, even for these properties, we expect the new rules to have very limited impacts in terms of the district's ability to keep pace with growth in dwelling demand over time. First, the rate of intensification will be directly limited by the capacity of existing infrastructure networks, such as roads, water, wastewater, and stormwater. There is only so much additional development that can occur before (potentially prohibitively expensive) upgrades will be required.

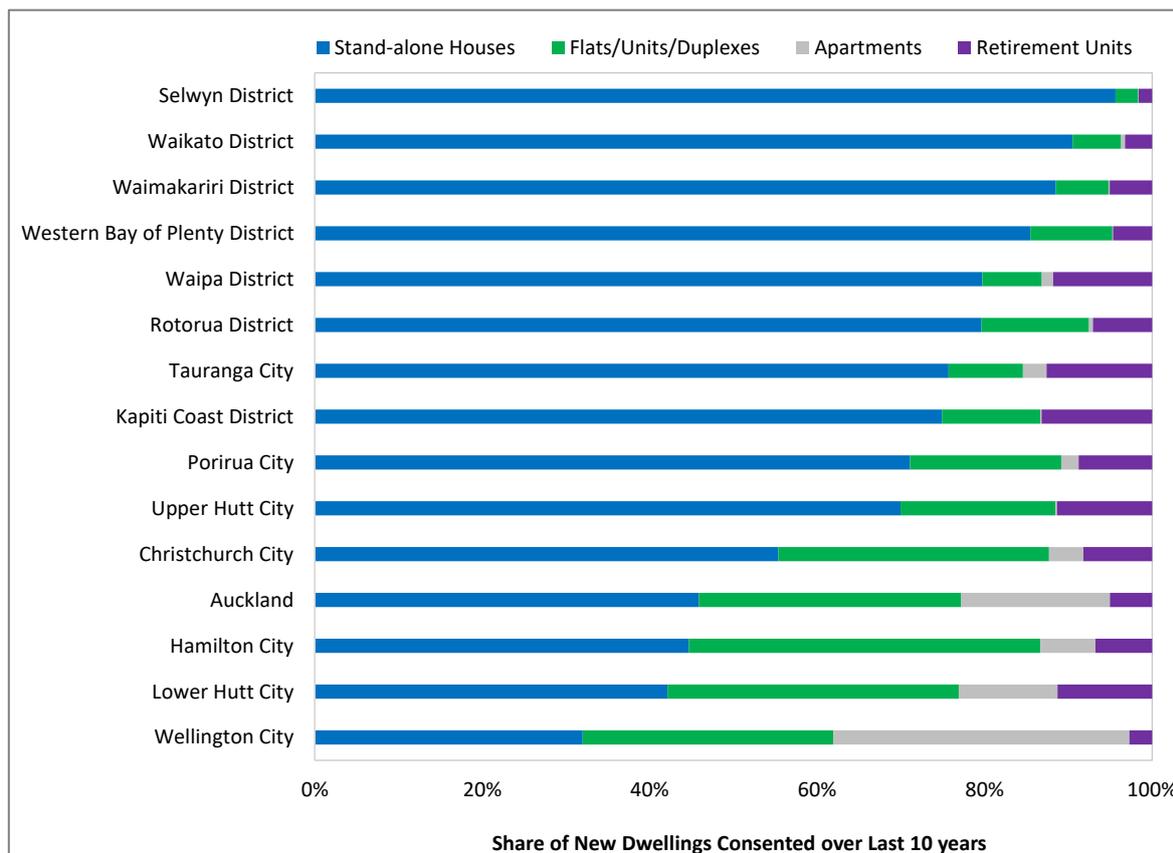
Second, in more provincial areas like Waimak, there is currently only limited demand for the types of housing enabled by the new rules, particularly over the short to medium term.

To put these comments in context, we extracted building consent data over the last 10 years for the Tier 1 NPSUD Councils (plus Rotorua District) where the new rules will apply. Then, we calculated the proportion of new dwellings in each area that were stand-alone houses vs higher density, attached dwellings (such as apartments, duplexes etc).

The graph below plots the results, where 88% of new dwellings consented in Waimak since June 2013 were stand-alone. By contrast, only 36% of new dwellings in Wellington City were stand alone, with values in the low 40s for a handful of other areas.

⁶ This follows from the fact that redevelopment is typically only viable either when land is vacant or when any existing buildings are very near the end of their useful lives (so that their demolition represents only a modest opportunity cost).

Figure 13: Composition of New Dwellings Consented since 2013 for MDRS Councils



In our view, the consent data above reveal a clear and overwhelming preference for mainly stand-alone houses in the district, which are unlikely to change materially over the short to medium term. Consequently, we do not consider the new MDRS rules to have any significant practical impact on the district's capacity to keep pace with growth in dwelling demand over time because there is little demand for such typologies. That said, we acknowledge that this is changing and that higher density living will become more common over time.

5.5 Implications for this Proposal

The analysis in this section confirms that the district is unlikely to be meeting its NPS-UD obligations to provide "at least" sufficient capacity "at all times" to meet ongoing growth in housing demand. Not only are the demand projections used in the HBA too low, but its estimates of feasible capacity are also significantly overstated for several reasons. When more realistic demand and supply figures are used, there are likely to be significant shortfalls across all three NPS-UD timeframes. Finally, while the new MDRS provisions may bolster feasible capacity by a small amount, they are unlikely to have much practical impact over the short- to medium-term due to relatively low demand for them currently. Consequently, there remains a pressing need to rapidly identify and enable additional development opportunities, particularly those aimed at the fastest growing segments of the population. i.e. retirement villages.

6. Assessment Against PDP Criteria

This section assesses the proposal against PDP criteria for converting rural land to residential to further consider its merits and appropriateness.

6.1 Discussion

As noted earlier, The PDP identifies certain parcels of rural land as “Future Development Areas,” and establishes a bespoke process via which they can become available for development prior to rezoning. The subject site comprises part of the Kaiapoi Development Area, as illustrated earlier in Figure 4.

To be eligible for early development, land in these new development areas must satisfy various certification criteria, one of which is that the⁷:

“Development will provide additional residential capacity to help achieve or exceed the projected total residential demand as identified in UFD-01 (for the medium term) as indicated by the most recent analysis undertaken by Council in accordance with the NPS-UD and published on the District Council website.”

UFD-01 is an objective in the Strategic Directions section of the PDP relating to urban form and development. It states that sufficient feasible development capacity for residential activity must be maintained to meet specific housing bottom lines and a changing demographic profile of the district. These bottom lines are shown in the table below.

Table 7: Housing Bottom Lines

Term	Timeframe	Development Capacity	Bottom Lines
Short to Medium Term	(2018-2028)	Residential Units	6,300
Long Term	(2028-2048)	Residential Units	7,100
30 Year Time frame	(2018-2048)	Residential Units	13,400

As noted in the previous section, the district is not meeting its obligations to provide at least sufficient capacity under the NPS-UD, so we consider that the proposal clearly satisfies criterion (1)(a) for early release in the Kaiapoi Development Area.

⁷ DEV-NER-S1 Criterion (1)(a)

7. Alternative Development Sites

This section considers whether the proposal could potentially be located elsewhere in Kaiapoi.

7.1 Analysis

We used Core Logic's Property Guru tool to identify alternative sites that met two basic criteria:

1. First, they must fall within the Kaiapoi Projected Infrastructure Boundary (PIB); and
2. Second, they must be at least six hectares to accommodate the proposed development⁸.

Our search yielded nine sections. These are plotted in Figure 14 below, with the town's three existing retirement villages / rest homes identified as blue triangles for reference.

Figure 14: Sections 6ha or Larger Located Within Kaiapoi Projected Infrastructure Boundary



⁸ This discounts the possibility of site amalgamation, which is a difficult and lengthy process and thus unlikely to occur.

While all nine sites could theoretically be used to develop a retirement village because they are inside the infrastructure boundary and sufficiently large, only one is currently owned by the applicant, and none of the rest are available to purchase. Consequently, all sites can effectively be discounted as unsuitable or unavailable, or both. However, for completeness we further note the following:

Kaiapoi Golf Club (#1) – this site is currently used as a golf course and hence is unavailable.

404B Williams Street (#2) – is currently in rural use, but is identified in the Kaiapoi Outline Development Plan as a future development area. It is significantly further from the Kaiapoi town centre than the subject site and is therefore an inferior location for the proposal.

177 Ferry Road (#3) – is part of the ongoing Beachgrove residential subdivision and is known specifically as the Moore Block. Not only is it further from the town centre than the subject site, but it is already earmarked for residential development by the applicant.

280 Beach Road (#4) – is also part of the Beachgrove development and is thus already planned for residential development. In addition, it is considerably further from the town centre than the subject site, which makes it an inferior locational choice.

Red-zoned Council reserve on Feldwick Drive (#5) – is unsuitable as it is officially a red-zoned area.

12 Williams Street (#6) – currently operates as Blue Skies – a training and conference centre that also provides visitor accommodation and attractions. It is much further from the town centre than the subject site and also is unlikely to become available soon. Even if it did become available, it would probably be unviable for development because it contains more than \$2 million of improvements that would need to be purchased and immediately demolished.⁹

Kaiapoi High School (#7) – is unavailable as it is currently used for education purposes.

Island Road (#8) – this site already contains the Sterling retirement village. And, since the applicant naturally would not wish to develop their village adjacent to, or within, a competing village, this site is also unsuitable.

14 Smith Street (#9) – is currently home to the Kaiapoi Rugby Club and Kaiapoi park. Given that it is already fulfilling an important community role and function, it would be inappropriate to repurpose it for private development.

7.2 Summary and Conclusion

Other than the subject site, there are only 9 sites inside the projected infrastructure boundary that are large enough to house the proposed development. However, none are available for purchase or development, and virtually all face other binding constraints (such as existing land uses) that render them unsuitable. Consequently, the subject site is the only one in Kaiapoi that meets the applicant's strict location criteria, is within the infrastructure boundary, and is available for development today (subject to gaining the necessary consents etc).

⁹ Property Guru notes that the improvements on this site were valued at \$2.15 million as at 1 July 2022.

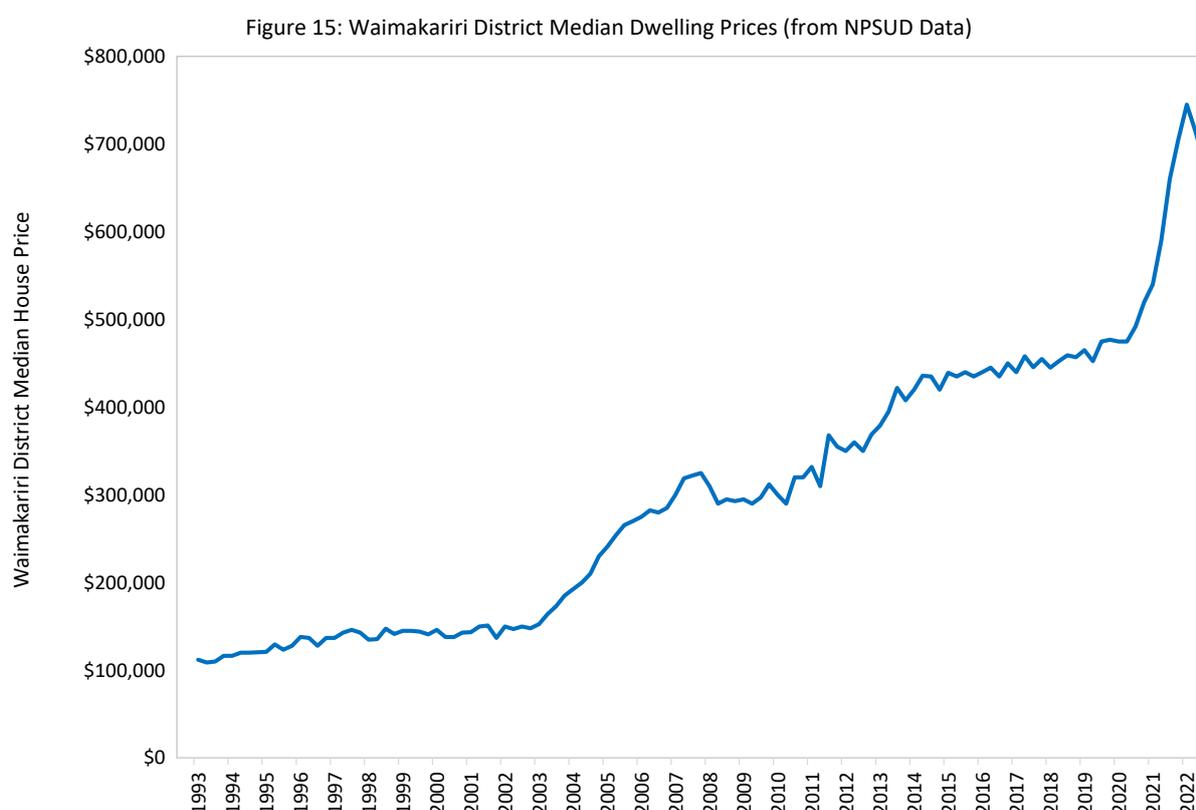
8. Economic Costs & Benefits of Proposal

This section assesses the likely economic costs and benefits of the proposal.

8.1 Boost in Market Supply/Restoring Supply of Residential Land

Perhaps somewhat obviously, the proposal will provide a substantial, direct boost in the district's dwelling capacity, thereby helping to narrow the gap between likely future supply and demand. All other things being equal, this supply boost will help the market to be more responsive to growth in demand, thereby reducing the rate at which district house prices grow over time (relative to the status quo).

Further, although the district's housing has been reasonably affordable compared to other parts of New Zealand in the past, that is changing. The latest data published under the NPSUD show that district dwelling prices continued to climb to March 2022 before correcting slightly in the past six months. Overall, however, the median price still increased by 38% in the two years to September 2022.



These increasing prices are starting to undermine affordability, with the latest report by Core Logic (from June 2022¹⁰) showing that the median district house price is now 8.1 times the median household income. By comparison, the benchmark for affordability is a ratio of only three.

In addition, the latest Core Logic report shows that it now takes even longer (about 10.7 years) to save the deposit for a new home in Waimakariri. Thus, not only are house prices themselves increasingly

¹⁰ Accessible here <https://www.corelogic.co.nz/news-research/reports/housing-affordability-report>

unaffordable, but even the task of saving the deposit for a new home is an onerous one that is beyond many households.¹¹

The rezoning directly responds to this need for additional dwelling capacity by enabling the development of approximately 301 new dwellings and care suites over time.

In our view, and from an economic perspective, this represents a significant boost in supply. To assess whether this satisfies the definition of “significant” in Objective 6(c) of the NPSUD (which relates to unanticipated or out-of-sequence proposals), we reviewed the latest HBA. At page 10, it discusses consultation with the development community (while writing the HBA) and describes landowners that could develop 20 or more dwellings as being significant.

As such (and particularly given the shortfalls we have described), we consider that the proposed development of approximately 301 dwellings on the subject site represents a significant increase in capacity for the Waimakariri district, from both an economic and market perspective and by virtue of the way that term is used in the HBA (and by extension how it might be considered for the purposes of Objective 6(c) of the NPSUD).

8.2 Meeting The Needs of an Evolving Population

The NPSUD requires high growth areas, like Waimakariri, to not only provide at least sufficient capacity to meet future demand in aggregate, but to also provide a range of housing typologies to meet a wide range of needs and preferences. This is shown in the excerpt below, which displays the first part of policy 1 of the NPSUD:

Table 11: Policy 1 of the NPSUD

<p>2.2 Policies</p> <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and</p>

The proposal gives effect to this mandate by catering for a specific demographic, who wish to live in a community with others at a similar life stage. This is important because, as illustrated in Section 4.2, not only is the district population growing rapidly, but its population is ageing. In fact, the number of district residents aged 70 and over is projected to grow by nearly 170% in the next 30 years.

Indeed, there are several ways in which this the proposal gives effect to Policy 1 of the NPS-UD. First, it provides for a mix of dwelling typologies and lot sizes, ranging from one-bedroom apartments of approximately 50 square metres, through to larger villas with three bedrooms and two bathrooms. Importantly, this includes dwellings that are considerably smaller than the existing Kaiapoi housing

¹¹ We note that recent interest rate rises will make this task easier than when the Core Logic report was published, but will still take many years and thus remain insurmountable for many would-be home buyers.

stock. In fact, the average dwelling size in the proposed development is just over 100m², compared to 180m² for Kaiapoi overall.

Second, as people age and life circumstances change, some properties become unsuitable, difficult to maintain, and even potentially hazardous. This is highlighted in evidence recently tabled in Selwyn by John Collyns from the Retirement Villages Association, which suggested that the lack of appropriate accommodation options there meant that many older people are living in unsuitable accommodation, which is affecting both their safety and wellbeing. The proposal directly responds to this need by providing single-storey homes in a secured environment, designed expressly for older people.

Third, the mix of dwelling typologies and section sizes helps to achieve a variety of price points, further giving effect to the NPSUD. Economies of scale achieved from the single-entity master-planned development will also likely help keep prices affordable.

Fourth, the proposal provides an opportunity for existing Kaiapoi residents to ‘age in place’, thus retaining important social connections. At the same time, the proposed development provides a “continuum of care” in one location, enabling residents to move from independent living into managed care if/when needed without the stress of selling and relocating elsewhere.

Finally, by providing housing options that cater specifically to the target demographic, this frees up older, larger dwellings for younger families or first homebuyers, for which they are likely to be better suited.

Accordingly, not only does the proposal make a significant contribution to both Kaiapoi, specifically, and the district overall, but it also helps give effect to Policy 1, which requires councils to provide various housing choices to meet a diverse range of needs and preferences.

8.3 Critical Mass to Support Greater Local Retail / Service Provision

The proposed development is located a short distance from the Kaiapoi Town Centre and is just one kilometre east of the emerging ‘Waimak Junction’ large format retail centre. As the proposed new retirement village is developed and fills up with residents, they will help create critical mass for a range of local services. This is important, because the district is currently very reliant on Christchurch City to supply a wide range of everyday household goods and services.

In fact, detailed Marketview (electronic transaction) data provided to us by the Council during another recent project showed that nearly half of all district resident spending on core retail goods and services leaked out to Christchurch City in 2019. The development, along with existing residents and the future residents of other growth areas, will provide critical mass to gradually improve the viability of local service provision. As a result, it will reduce the need to commute to the city. That, in turn, will reduce fossil fuel use, reduce harmful emissions, and reduce the scope for motor accidents.

To put this in context, we estimated likely future spending originating on the subject site at full build-out by applying regional average spending from the latest Household Economic Survey. As households at the retirement village will be smaller than average, and residents typically less active, we have reduced this average spend by one third. To be conservative, these estimates also ignore ongoing

growth in annual household income over time. The results are tabulated below, and reflect total annual spending by 211 new (independent-living) households¹².

Table 8: Projected Future Spending Originating Onsite

Expenditure Group	Adj. Annual Spend per Household	Total Annual Spend (\$ millions)
Food	\$8,180	\$1.7
Alcoholic beverages, tobacco, and illicit drugs	\$1,100	\$0.2
Clothing and footwear	\$1,600	\$0.3
Housing and household utilities	\$10,340	\$2.2
Household contents and services	\$1,573	\$0.3
Health	\$1,367	\$0.3
Transport	\$7,120	\$1.5
Communication	\$1,233	\$0.3
Recreation and culture	\$4,380	\$0.9
Education	\$707	\$0.1
Miscellaneous goods and services	\$4,227	\$0.9
Other expenditure	\$5,213	\$1.1
Total Household Expenditure	\$47,040	\$9.9

Table 5 shows that future residents of the independent-living villas and apartments will spend \$9.9 million per annum on a wide range of household goods and services, assuming they spend at just two-thirds the rate of the average regional household.

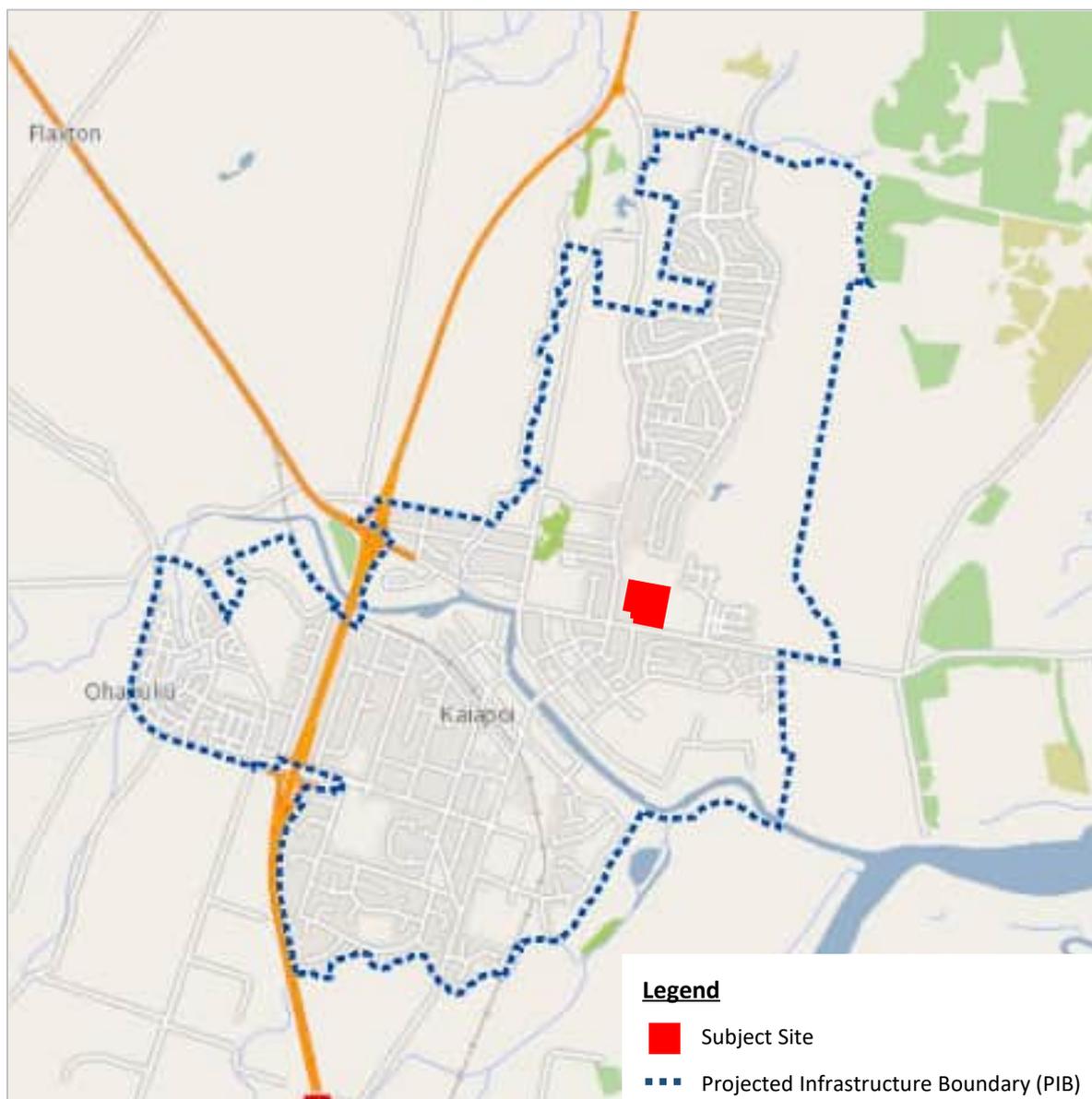
Importantly, the shopping habits of these future residents are likely to differ from typical households. As discussed in the next sub-section, retirement village residents travel significantly less than younger people on average, due in part to reduced mobility. Accordingly, it is likely that a high proportion of their household purchases will occur close to the subject site, at either Kaiapoi Town Centre, or Waimak Junction. Accordingly, future development of the land will provide significant commercial support for Kaiapoi businesses.

8.4 Infrastructure Efficiency

While growth confers many benefits on the district, such as critical mass to support local businesses, it also carries significant costs. For councils, one of the most pressing costs of growth is the need to provide local infrastructure, such as water, wastewater, and roads. Fortunately, the subject site is surrounded by developed land and is also within the Kaiapoi Projected Infrastructure Boundary (PIB), as denoted by the dashed blue outline in Figure 16 below. As a result, the development is likely to achieve high levels of infrastructure efficiency.

¹² That is, excluding rest home rooms and suites.

Figure 16: Location of Subject Site Within Kaiapoi Projected Infrastructure Boundary



Moreover, a recent study that we completed for Tauranga City Council showed that residents of retirement villages place significantly lower demand on council resources than typical households. It considered the infrastructure demands of comprehensive retirement villages in New Zealand (akin to the proposal), and found that residents of retirement villages:

- Have significantly lower transport demand than a typical household, with an average retirement village unit generating about three vehicle trips per day, and aged care units closer to 1.5 trips per day. In contrast, new residential dwellings are typically considered to generate 10 trips per day.
- Place significantly lower demand on council reserves and community facilities than a typical household.

This is due not just to the older age of retirement village residents and their relatively limited activity / mobility, but also the often-extensive provision of onsite social and recreational facilities (such as those proposed by this proposal) to meet residents' needs without having to travel offsite.

By achieving high levels of infrastructure efficiency, the proposal avoids unnecessary financial risks and costs for the Council – as the primary local infrastructure provider – while helping to keep the costs of new homes as low as possible.

8.5 One-off Economic Stimulus

Constructing the 211 new homes, the rest home, and associated community facilities enabled by the proposal will generate significant one-off economic impacts. We quantified these using a technique called multiplier analysis, which is based on detailed matrices called input-output tables. These tables describe the various supply chains that comprise an economy, and therefore enable the wider economic impacts of a change in one sector (or sectors) to be traced through to estimate the overall impacts.¹³

These impacts include:

- **Direct effects** – which capture onsite activities directly enabled by the proposal; plus
- **Indirect effects** – which arise when businesses working directly on the project source goods and services from their suppliers, who in turn may need to source good/services from their own suppliers, and so on; and
- **Induced effects** – which occur when a share of the additional wages and salaries generated by the project (directly or indirectly) are spent in the local/regional economy and therefore give rise to additional rounds of economic impacts.

These economic effects are usually measured in terms of:

- **Contributions to value-added (or GDP).** GDP measures the difference between a firm's outputs and the value of its inputs (excluding wages/salaries). It captures the value that a business adds to its inputs to produce its own outputs.
- **The number of people employed** – this is measured in terms of employment counts, which include both part-time and full-time workers, because Statistics New Zealand does not provide data on full-time equivalent employees (FTEs).
- **Total wages and salaries** paid to workers, which are often labelled 'household incomes.'

Having defined these key terms, the following table shows the estimated economic impacts of the various activities enabled by the proposal.

¹³ The multipliers used here are for the Canterbury region, and were derived by our organization. They are widely used by a range of public and private organisations across New Zealand, including Lincoln University.

Table 9: One-Off Regional Economic Impacts of Construction

Planning/Design/Consent	Direct	Indirect	Total
FTEs – 12 months	100	45	145
GDP \$m	\$11	\$6	\$17
Wages/Salaries \$m	\$6	\$3	\$9
Site Preparation			
FTEs – 12 months	35	45	80
GDP \$m	\$6	\$6	\$12
Wages/Salaries \$m	\$3	\$3	\$6
Construction			
FTEs – 7 years	25	75	100
GDP \$m	\$25	\$70	\$95
Wages/Salaries \$m	\$10	\$35	\$45

In summary, we estimate that:

- Future planning/design/consenting work will create full-time employment for about 145 people for 12 months, generating \$9m in wages/salaries;
- Site preparation (including infrastructure provision) will generate full-time work for approximately 80 people for 12 months (split across various stages), with \$6m in wages/salaries paid; and
- Construction of dwellings and associated community and care facilities will provide full-time work for around 100 people for seven years (again, split across various stages), with around \$45m paid in wages and salaries.

8.6 Ongoing Employment

Once operational, the proposal will also provide ongoing employment across a range of roles. These may include, for example¹⁴:

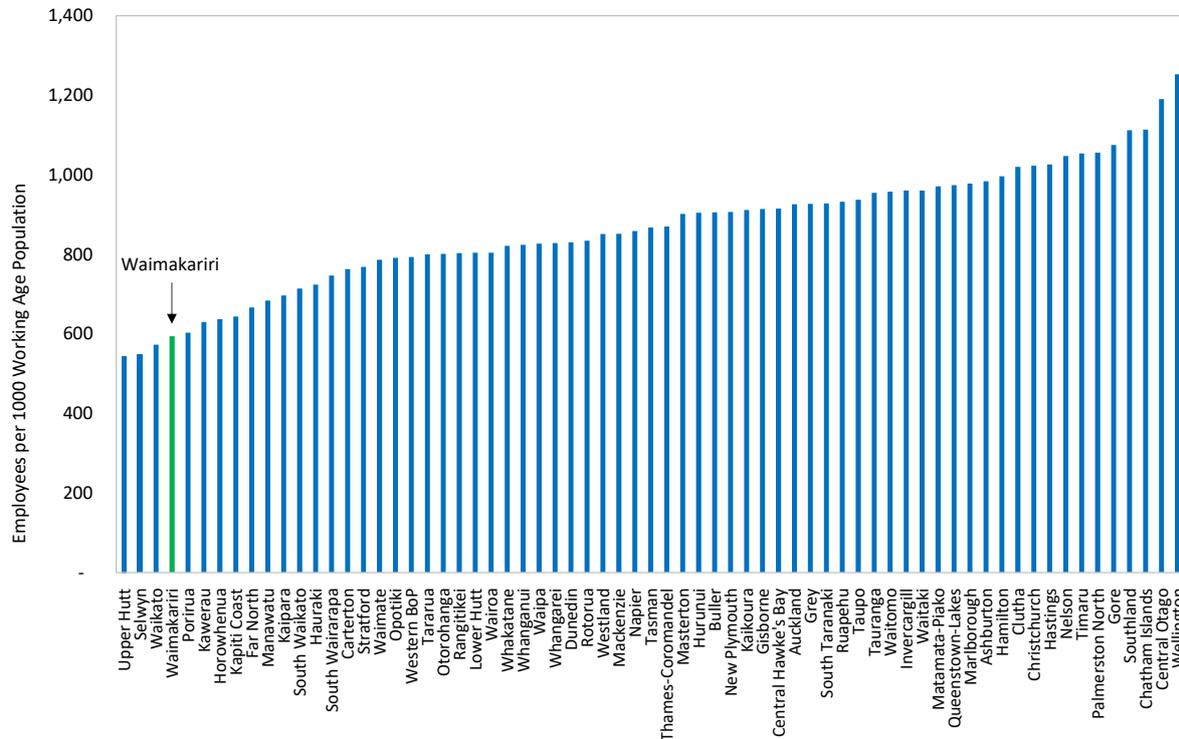
- Carers and medical staff;
- Village managers;
- Gardeners;
- Repairs;
- Maintenance;
- Cleaners;
- Home help;
- Transport;
- Chefs, kitchen staff;
- Marketing and advertising;
- Laundry services;
- Accounts; and
- Activities coordinators.

In total, based on information provided by the applicant, the independent living segment of the village is likely to sustain approximately 15 FTE jobs on an ongoing basis. In addition, the residential care facility is likely to employ approximately 40 staff in a mix of full- and part-time work. This direct boost in ongoing employment will also help to improve the district's employment self-sufficiency. This is

¹⁴ "Retirement village contribution to housing, employment, and GDP in New Zealand: A report for the New Zealand retirement village industry", PWC, March 2018, p23.

important because, as shown in the figure below, Waimakariri district's employment self-sufficiency was the fourth lowest in New Zealand in 2022.

Figure 17: District Employees per 1000 Working Age Population - 2022



In February 2022, the district had just 594 jobs per 1000 working age residents, compared to a national average of 910. This low rate of local jobs per worker is why so many district residents commute to Christchurch City. In fact, 2018 census data showed that one third of all workers living in the district worked in Christchurch City – one of the highest rates of outflow in the country.

8.7 Foregone Rural Production

The main potential economic cost of the proposal is forfeiting the land for alternative uses, such as rural production. However, the viability of the site for rural production is limited by its relatively small size and its peri-urban location. The former renders it too small to reach the “minimum efficient scale” for many rural productive uses, while the latter raises the ongoing issue of reverse sensitivity with neighbouring land uses. Coupled with ongoing regionwide restrictions on water takes and nutrient applications, the site's rural productive potential is limited, both now and in the future.

9. Summary and Conclusion

This assessment has shown that future development enabled by the proposal represents a significant boost in dwelling capacity, which will help keep pace with demand while also helping to meet NPS-UD requirements. Overall, the proposal will generate a wide range of enduring economic benefits and avoid any material economic costs. Accordingly, we support it on economic grounds.

10. Appendix: Critique of Capacity Modelling

This appendix critiques various aspects of the Council’s latest estimates of feasible dwelling capacity, as contained in the 2021 Housing Capacity Assessment.¹⁵

10.1 Assumed Development Yields

When calculating the feasible capacity for new dwellings still residing in the district’s existing greenfield areas, which account for most of the short-run supply, the modelling assumes that only 25% of such land will be used for infrastructure (such as roads, parks, and reserves). Thus, it assumes that 75% of the land will be available for development.¹⁶ In FDA areas, it assumes a 100% yield.

To ground truth these assumptions, we reviewed a recent, detailed report on residential development densities by Harrison Grierson, which was commissioned by the Greater Christchurch Partnership (GCP).¹⁷ It profiles the development outcomes achieved across various recent greenfield subdivisions, several of which were in Greater Christchurch.

We extracted data from that report to identify the proportion of land in each subdivision used for residential dwellings versus commercial uses or infrastructure. The results are tabulated below, and show that only 60% of greenfield land is typically available for new housing, not 75% as the HBA modelling suggest.

Table 10: Land Use Coverage Ratios in Recent Greenfield Subdivisions

Greenfield Development	Residential	Commercial	Infrastructure	Total
Spring Grove (Belfast, Christchurch)	53%	0%	47%	100%
Golden Sands (Papamoa, Tauranga)	58%	1%	41%	100%
Huapai Triangle (Kumeu, Auckland)	58%	1%	41%	100%
Longhurst (Halswell, Christchurch)	63%	2%	35%	100%
Greenhill Park (Chartwell, Hamilton)	53%	0%	47%	100%
Faringdon (Rolleston, Selwyn)	63%	1%	36%	100%
Sovereign Palms (Kaiapoi, Waimakariri)	71%	1%	28%	100%
Average	60%	1%	39%	100%

We acknowledge that the proportion of land available for residential development varies across the case study areas in Table 10, and that geotechnical conditions are a key driver. For example, in low-lying, flood prone areas, more land is generally needed for stormwater management, with less required in more elevated and well-drained areas.

Based on our discussions with local developers – who have collectively developed more than 4,000 sections across Greater Christchurch over the last 10 to 15 years – we understand that a net yield of

¹⁵ <https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Greater-Christchurch-Housing-Development-Capacity-Assessment-July-2021.pdf>

¹⁶ See page 42 of the HBA (30 July 2021).

¹⁷ https://www.selwyn.govt.nz/data/assets/pdf_file/0005/475466/UG-Chapter-Appendix-3-HG-Greenfield-Density-Analysis.pdf

65% is more likely to reflect future development outcomes across Selwyn district, not the 75% assumed in the HBA. We return to this point shortly.

Yet another issue with the Council's estimates of feasible capacity relate to the FDAs identified in the 2018-2048 Our Space Strategy. As discussed just above, not all of that land will be available for residential development either, with some instead required for roads, reserves, and other infrastructure that is expressly excluded from the definition of net density in the Canterbury Regional Policy Statement and which dictates the 12 dwellings per hectare target. Consequently, the estimates of feasible capacity residing in the FDAs need to be scaled down too to allow for the land required by these excluded features.

Because the assumed yields of 12 to 15 dwellings per hectare for the FDAs reflect net densities, they already account for local roads and reserves etc. To account for other non-residential land uses – such as arterial roads, stormwater areas, commercial activities, schools, and so on – we understand that the FDA yields should be scaled down by about 15%.

10.2 Assumed Profit Margin on House Construction

Another significant issue that seriously undermines the veracity of the HBA's estimates of feasible development capacity is the profit margin that is assumed to be required by developers. According to official guidance published by MBIE, feasibility assessments should adopt a default development margin of 20%, with that input value altered only upon review from the development community.

In our 20 years of working with developers and other property professionals, a 20% target return is common practice, although many developers target a higher return of around 25% to reflect the significant risks associated with property development.

The analysis underpinning the latest HBA for Waimak, however, adopts a far lower development margin of only 6.6%. This much smaller margin, in turn, lowers the financial hurdle required for hypothetical developments to be considered commercially feasible, and therefore directly overstates likely future dwelling supply.

Interestingly, bullet 2 in appendix 3 of the HBA acknowledges that a 20% development margin is recommended by MBIE, but notes that the assessment has departed from it “to better recognize local and actual market parameters.”

We are unaware of any basis for this assertion. Indeed, we are unaware of any developers in the Greater Christchurch area that would risk millions of dollars of their own capital to potentially earn a 6.6% development margin. Nor are we aware of any lenders that would inject capital into a venture where the profit margins are so thin and hence the project is at risk of potential default. Interestingly, this inexplicably low profit margin also was not reviewed or endorsed by the development community, as required by official guidance.

To put it in context, a target return of 6.6% could only ever be considered a “black swan” scenario that might be used to assess the absolute worst case, but it would never be used as the baseline assumption. It simply makes no sense, so we dug deeper to better understand the origins of this rather unusual and misleading assumption.

Our query was answered on page 50 of the HBA, where the authors cite data from Stats New Zealand, which allegedly showed a development margin of only 6.6% for house construction. We then obtained a copy of that data from Stats NZ and identified the 6.6% figure to put it in context. Regrettably, the HBA's authors appear to have mistaken two similar but entirely different financial metrics.

The first metric is the development margin, which is the profit that a developer seeks to earn over and above their costs for a given project. The second is net profit after tax, or NPAT, which measures the profit earned by a venture when all costs – including tax – are deducted.

In short, it appears that the HBA's authors have mistakenly used the NPAT figure from those financial data and assumed that it equals the developer margin. However, NPAT accounts for a wide range of costs that do not feed into the calculation of developer margins, such as fixed operating costs, depreciation, amortization, and income tax.

The upshot of all this is that the HBA has used an implausibly low developer margin to calculate the commercial feasibility of building new homes in the district, and therefore has overstated the true extent of feasible development capacity. These figures are an improvement on the previous HBA, however, which assumed that all plan-enabled capacity would be commercially feasible to develop.

Attachment 1



Figure 1 – Aerial view of Momentum’s landholdings in Kaiapoi



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

To: Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

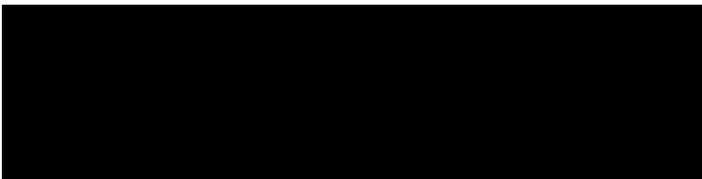
Submitter: **MOMENTUM LAND LIMITED**

C/- Saunders & Co.,

Attention: Margo Perpick

Proposal: Draft Greater Christchurch Spatial Plan

Address for service of submitter:
c/- Margo Perpick
Saunders & Co



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Name of submitter:

- 1 Momentum Land Limited (**Momentum** or the **submitter**).

Proposal to which submission relates:

- 2 This submission relates to the Draft Greater Christchurch Spatial Plan (the **draft Spatial Plan**) in its entirety and particularly those provisions which apply or affect the following properties in Kaiapoi:
 - 2.1 Lot 5 DP 313322, Lot 2 DP 4532, and Lot 1 DP5010 (28.5ha), being part of 177 Ferry Road (**North Block**):
 - 2.2 Lot 2 DP 89191 (6.05ha), being 310 Beach Road (**South Block**)
- 3 The locations of Momentum's landholdings as described above, are shown on the image appended at **Attachment 1**.
- 4 The land referred to above and depicted in Attachment 1 are referred to herein as **the North Block**, and **the South Block**, or collectively **the Momentum land**.
- 5 The submitter could not gain advantage in trade competition through this submission.

Details of submission

- 6 Momentum's submission relates to the Draft Spatial Plan as a whole, but has a specific focus on:
 - 6.1 Confirming the Momentum land as part of the Future Urban Development Area in Kaiapoi; and
 - 6.2 Identifying the Momentum land as Greenfield Priority Areas - Residential; and
 - 6.3 Amending Map 2 and Map 14 to reflect the identification of the Momentum land as Greenfield Priority Areas – Residential; and

- 6.4 Amending Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport.

Statement of Interest and Background

- 7 Momentum is a development company which either owns or has agreements pending and agreements reached to purchase the Momentum land described in paragraph 2.1.

The North Block and the South Block – Current and Proposed Status

- 8 The North Block and the South Block are currently:
- 8.1 identified as Future Development Areas on Map A of Chapter 6 of the Canterbury Regional Policy Statement (the **CRPS**); and
 - 8.2 zoned Rural in the Operative Waimakariri District Plan (the **OWDP**) and Rural Lifestyle Zone in the Proposed Waimakariri District Plan (the **PWDP**).
- 9 Momentum seeks to develop the North Block for residential purposes and the South block for retirement village purposes.
- 10 To that end, Momentum has lodged submissions and further submissions on the PWDP, and on Variation 1 to the PWDP, seeking to have the Momentum land zoned Residential Medium Density.
- 11 A series of Location Maps are enclosed with this submission in **Attachment 1**. The aerial photographs at **Figure 1** show the North block and the South block as being in pasture currently, but immediately adjacent to (North block) or surrounded by (South block) residential development. The Momentum land has physical connections enabled to both transportation and infrastructure routes. Residential development of the Momentum land is a logical extension of existing urban form.

- 12 The North block is located immediately to the north of the Beachgrove subdivision, which is located at 280 Beach Road, Kaiapoi. This subdivision has been developed by Beach Road Estates Limited. It is the subject of the East Kaiapoi Outline Development Plan and is proposed to be zoned Residential Medium Density. A road connection is provided between Beachgrove and the North block. This connection was required by Waimakariri District Council (**WDC**) as part of Stage 3 of Beachgrove and was vested as Local Purpose Reserve (Future Road), in recognition that the North block is identified in the CRPS as a Future Development Area, and therefore likely to be residentially developed in the future.
- 13 Under the CRPS, the Momentum land is located either in a 'Greenfield Priority Area' (Lot 2 DP 4532, and Lot 1 DP5010) or otherwise in a 'Future Development Area'. Therefore, the urban development of these sites is anticipated in the CRPS. Objective 6.2.2(2) of the CRPS provides for 'higher density living environments' in Greenfield Priority Areas and Future Development Areas. This is also supported under Policy 6.3.12 in FDAs.
- 14 The 'Kaiapoi Outline Development Plan – Overall' map in the PWDP shows the Momentum land as 'General Residential Density', with the exception of a small area at 310 Beach Grove (alongside the un-named paper road) which is proposed as 'Medium Residential Density'.
- 15 **Figure 3** shows that the Momentum land is within the Projected Infrastructure Boundary on Map A in the CRPS.

Submission Summary

- 16 This submission relates to the Draft Spatial Plan as a whole, but has specific focus on:
- 16.1 In order to satisfy the requirements of the National Policy Statement on Urban Development (**NPS-UD**) for a Future Development Strategy (**FDS**) to:
- a promote long-term strategic planning by setting out how the local authorities intend to:
 - i achieve well-functioning urban environments in their existing and future urban areas¹; and

¹ NPS-UD clause 3.13(1)(a)(i).

- ii provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 of the NPS-UD, over the next 30 years to meet expected demand;² and
 - iii assist the integration of planning decisions under the Act with infrastructure planning and funding decisions³ and
- b spatially identify the broad locations in which development capacity will be provided over the long term, in both existing and future urban area, to meet the requirements of clauses 3.2 and 3.3 of the NPS-UD⁴

the Draft Spatial Plan must identify the Momentum land as Greenfield Priority Areas – Residential, as well as confirming that the Momentum land is within a Future Urban Development Area.

16.2 The draft Spatial Plan does not currently enable well-functioning urban environments in the Greater Christchurch (**GC**) area. Specifically, it does not identify any Greenfields Priority areas - Residential or Business – in the GC area, and so does not:

- a enable a variety of homes that meet the needs, in terms of type, price, and location of different households;
- b have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- c support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- d support reductions in greenhouse gas emissions;
- e enable an urban environment in Christchurch which is resilient to the likely current and future effects of climate change.

² NPS-UD clause 3.13(1)(a)(ii).

³ NPS-UD clause 3.13 (1)(b).

⁴ NPS-UD clause 23.13 (2)(a).

- 17 This submission seeks to:
- 17.1 Confirm the Momentum land as part of the Future Urban Development Areas; and
 - 17.2 Identify the Momentum land as Greenfield Priority Areas - Residential; and
 - 17.3 Amend Map 2 and Map 14 to reflect the change in identification of the land, as above; and
 - 17.4 Amend Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport.

Submissions

- 18 The Draft Spatial plan must comply with the requirements of a Future Development Strategy under the NPS-UD by identifying Greenfield Priority Areas – Residential and Business
- 19 The Draft Spatial Plan states that it satisfies the requirements of a FDS under the NPS-UD.⁵ However, in order to meet the requirements to provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 over the next 30 years to meet expected demand⁶, and assist the integration of planning decisions under the Act with infrastructure planning and funding decisions,⁷ it must spatially identify the broad locations in which development capacity will be provided over the long term, **in both existing and future urban areas**, (our emphasis) to meet the requirement of clauses 3.2 and 3.3⁸ by identifying Greenfield Priority Areas – Residential and Business.
- 20 Clause 3.2 requires every tier 1, 2 and 3 local authority to provide **at least sufficient** development capacity in its region or district to meet expected demand for housing:

⁵ Draft Greater Christchurch Spatial Plan, p.23.

⁶ NPS-UD clause 3.13(1)(a)(ii).

⁷ NPS-UD clause 3.13(1)(b).

⁸ NPS-UD clause 3.13(2)(a).

- a **in existing and new urban areas**; and;
- b **for both standalone dwellings and attached dwellings**; and
- c in the short term, medium term, **and long term**.⁹

In order to be **sufficient** to meet expected demand for housing, the development capacity must be:

- a **plan-enabled**; and
- b **infrastructure-ready**; and
- c **feasible and reasonably expected to be realised**; and
- d meet the expected demand plus the appropriate competitiveness margin (for tier 1 and 2 local authorities).¹⁰

(our emphasis)

- 21 Contrary to these requirements, the Draft Spatial Plan fails to provide for any Greenfields Priority Areas - Residential in the Greater Christchurch area. Although it provides for some Future Urban Development Areas in Kaiapoi and other towns in Waimakariri District and Selwyn District, the identification of land as a FUDA enables both potential Residential and potential Business uses, and so does not make certain and sufficient provision for either.
- 22 Failure to identify Greenfields Priority Areas – Residential will result in a failure to enable a variety of homes to meet the needs, in terms of type, price and location of different households, particularly for the medium and long terms. Reliance on infill housing and intensification will mean that, as the population of Kaiapoi grows over the next 30 years, the number of standalone homes, in relation to the population will fall, making those homes scarcer and therefore less affordable. Identifying the Momentum land as Greenfields Priority Areas – Residential is necessary to meet the expected demand for a variety of homes in Kaiapoi over the medium to long term.

⁹ NPS-UD clause 3.2(1)(a)(b) and (c).

¹⁰ NPS-UD clause 3.2(2)(a)(b) and (c).

- 23 Identifying the Momentum land as Greenfields Priority Areas – Residential would also provide for good accessibility for people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport, as the Momentum land is very close to the town centre of Kaiapoi and also to public transport services to take Kaiapoi residents to Christchurch.
- 24 As an FDS, the Draft Spatial Plan must spatially identify the broad locations in which development capacity will be provided **over the long term, in both existing and future urban areas**, to meet the requirements of clauses 3.2 and 3.3.¹¹ The Draft Spatial Plan fails to meet this requirement in that it does not identify Greenfields Priority Areas – either Residential or Business. In relation to Kaiapoi, the Draft Spatial Plan has not made provision for development capacity over the long term, **in both existing and future urban areas**, as the Future Urban Development Area is not specific as to the amount of Residential and Business use that will eventuate. Also, the Draft Spatial Plan is relying too heavily on the capacity of existing areas to be intensified and infilled. That is not a **feasible and reasonably expected to be realised** source, and therefore not **sufficient**.¹²
- 25 The contents of the Draft Spatial Plan will affect the future contents of planning instruments under the RMA, such as the CRPS and the PWDP; Clause 3.17 of the NPS-UD requires every tier 1 and 2 local authority to have regard to the relevant FDS when preparing or changing RMA planning documents. The failure of the Draft Spatial Plan to provide for sufficient development capacity in Kaiapoi is likely to result in those RMA documents also failing to give effect to the NPS-UD.

Well-functioning urban environments

- 26 The Draft Spatial Plan states it provides for a well-functioning urban environment, and sets out the criteria for this on p.23 of the Plan, reflecting the content of Policy 1 of the NPS-UD. To the contrary, by not allowing for any Greenfields Priority Areas (Residential or Business) in the Kaiapoi area, the Draft Spatial Plan does not meet several key aspects of Policy 1, which defines well-functioning urban environments as, at a minimum:
- a having or enabling a variety of homes that:

¹¹ NPS-UD clause 3.13(2)(a).

¹² NPS-UD clause 3.2(2)(c).

- i meet the needs, in terms of type, price, and location, of different households; and
 - ii enable Māori to express their cultural traditions and norms; and
- b having good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - c supporting, and limiting as much as possible adverse impacts on the competitive operation of land and development markets; and
 - d supporting reductions in greenhouse gas emissions; and
 - e are resilient to the likely current and future effects of climate change.

27 The Draft Spatial Plan does not meet the above requirements as it does not provide for any Greenfields Priority Areas - Residential within the Kaiapoi area. The Draft Spatial Plan projects that the feasible capacity of the Waimakariri District, over the next 30 years, is 14,450 additional households, while the expected demand (with a margin) is 13,250 households over that time frame, and on that basis asserts that there is a small surplus of housing capacity over demand (350 in the medium term and 1200 in the long term).¹³

28 The Draft Spatial Plan has not provided any assessment of feasible housing capacity or housing demand in Kaiapoi, and has simply assessed the whole of the Waimakariri District as if it is one housing market. As Kaiapoi is the closest Waimakariri town to Christchurch, the demand for housing is likely to be greater in Kaiapoi than in Waimakariri overall, so deficits of housing capacity to meet demand are more likely to result in Kaiapoi.

29 In making its capacity and demand assessments for the Waimakariri District, the Draft Spatial Plan overestimates capacity and underestimates demand. In relation to demand, it estimates 5600 households in the medium term (ie average 560 households per year for 10 years, including margin) and 13250 household in the long term (ie average 442 households per year for 30 years, including margin), but Waimakariri District building consents averaged more than 700 per year for the 5 years up to 2022, and more than 570 per year over the last 30 years.¹⁴

¹³ Draft Greater Christchurch Spatial Plan, p. 69.

¹⁴ *Economic Assessment of Proposed Retirement Village in Kaiapoi*, Insight Economics, 18 July 2023, p.10.

- 30 In relation to feasible capacity, the Draft Spatial Plan overestimates capacity in the following ways:
- 30.1 It assumes that, in existing greenfields areas, 75% of land will be available for development, and in FUDAs, 100% of land will be available for development. The actual yields of recent developments (taking into account land used for infrastructure and commercial uses) are 60 - 65% for greenfields and 85% for FUDAs.¹⁵
- 30.2 It assumes an unrealistically low development margin of 6.6%, rather than the usually required development margin of at least 20%.¹⁶
- 30.3 It fails to take account of the effect of the National Environmental Standards on Freshwater (**NES-FW**) which negatively affects the development potential of greenfields areas and FUDAs, particularly areas which are low-lying and flood-prone, as is the case throughout most of the eastern parts of the Waimakariri District, where development is most likely to take place.¹⁷
- 30.4 It assumes house prices, building costs and official cash rates from 2020/21, all of which have changed markedly since then, in ways which discourage the development of housing supply compared to that time.¹⁸
- 30.5 It fails to take account of the following factors which mean that likely market supply of homes will fall short of the calculated feasible capacity:¹⁹
- a Developer intentions: not all landowners have clear intentions to develop their land in the short-medium-long terms, nor to sell their land to others who may wish to develop it.
 - b Tax implications: greenfield land-owners are liable for taxes on recent land value uplifts caused by rezoning, these taxes being greatest in the first year following the rezoning, but gradually diminishing over time and then ceasing 10 years later. This can cause land to be withheld from the market for up to a decade.

¹⁵ Ibid., pp.11 & 30.

¹⁶ Ibid., p.31.

¹⁷ *Economic Assessment of Proposed Retirement Village in Kaiapoi*, Insight Economics, 18 July 2023, p.11.

¹⁸ Ibid., p.12.

¹⁹ Ibid., p.14.

- c Land banking and drip-feeding: Some landowners intend to develop in the future, but are currently withholding supply to capitalise on inevitable land price inflation, while some are drip-feeding supply to maintain prices and maximise returns.
- d Site constraints: the estimates of feasible capacity consider only some infrastructure site constraints while ignoring others such as power and telecommunications, and also overlook other factors that affect developability, such as contamination or awkward site shape/topography.
- e Operational capacity: some landowners face operational capacity constraints, which limit the number of new residential lots that they can supply per annum.
- f Financing: similarly, some landowners face capital/financing constraints that also limit their ability to supply.

31 Given these various market forces, it follows that actual market supply will only ever be a modest proportion of feasible capacity, and that reliance on “just enough” feasible capacity to meet demand will invariably lead to significant and prolonged market shortages.

32 The Draft Spatial Plan estimates of feasible capacity also overestimate the impacts of the medium density residential standards (**MDRS**) in that:²⁰

- a Much of the existing zoned urban area in Waimakariri District is already built out, and in Kaiapoi, is relatively new.
- b The rate of intensification which can be achieved is limited by the capacity of existing infrastructure networks. The Council is yet to carry out detailed modelling to assess the capacity to service all plan-enabled and expected capacity within existing residential areas.²¹ Whereas for greenfield areas, new infrastructure can be appropriately sized and designed to meet the scale of new neighbourhoods.²²

²⁰ *Economic Assessment of Proposed Retirement Village in Kaiapoi*, Insight Economics, 18 July 2023, p.15.

²¹ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.53.

²² *Ibid.*

- c In provincial districts such as Waimakariri, there is currently only limited demand for the intensified types of housing enabled by MDRS. Housing consents in the Waimakariri District over the last decade were 88% stand-alone dwellings, only 7% flats/units/duplexes and 5% retirement units (of which there has been and still is a shortage of supply to meet the demand in the District).
 - d Māori and Pasifika people prefer 2-3 bedroom + standalone housing.²³
 - e Engagement carried out with the development sector in Christchurch, as part of the background work for the Draft Spatial plan, showed that developers prefer to build standalone single and two story dwellings and single and two storey multi-unit complexes in residential areas, as this is where the demand lies.²⁴
- 33 Currently, there is little greenfield land available for development in Kaiapoi, with the Beach Grove development being the only significant undeveloped land left in the town. 300 lots have already been developed in Beach Grove, with a further 100 currently underway, leaving only a further 200 lots to be developed in 2023/24, after which there will be no more greenfield land to accommodate ongoing growth in demand for living in Kaiapoi. New areas like the Momentum land need to be opened up as soon as possible to keep pace with demand.²⁵

Choice and Competitiveness

- 34 Clause 3.22 of the NPS-UD defines "a competitiveness margin" as "a margin of development capacity, over and above the expected demand that tier 1 and tier 2 local authorities are required to provide, that is required in order to support choice and competitiveness in housing and business land markets." That is consistent with the part of the definition, in Policy 1(d) of the NPS-UD, of "well-functioning urban environments" as being ones which "support and limit as much as possible adverse impacts on, the competitive operation of land and development markets".
- 35 The capacity requirements of the NPS-UD are minima, not targets, and they must be achieved "at all times". Even if a Council appears to have "sufficient" capacity to meet demand, that does

²³ Ibid., p.37.

²⁴ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.18.

²⁵ *Economic Assessment of Proposed Retirement Village in Kaiapoi*, Insight Economics, 18 July 2023, p.7.

not negate the benefits of providing more. The opposite is generally true. All other things being equal, the greater the capacity provided, the greater the degree of land market competition and the more efficiently the market operates (for the wider benefit of the community). The risks of an oversupply typically pale in comparison to those of an undersupply if the cost and risk of providing the necessary infrastructure can be shifted onto developers, which is normally the case for greenfield developments.²⁶

Well connected to public & active transport

- 36 The Momentum land is located a short distance from the Kaiapoi Town Centre and public transport into Christchurch, and is just one kilometre east of the emerging “Waimakariri Junction” large format retail centre. It is well integrated with Kaiapoi’s existing urban areas.

Greenhouse gas emissions

- 37 Development of the Momentum land will help create critical mass for a range of local services in Kaiapoi. This is important, because the town and the wider Waimakariri district are currently very reliant on Christchurch City to supply a wide range of everyday household goods and services. Marketview (electronic transaction) data provided by the Council has shown that nearly half of all Waimakariri district resident spending on core retail goods and services leaked out to Christchurch City in 2019. The development of the Momentum land, along with existing residents and the future residents of other growth areas, will provide critical mass to gradually improve the viability of local service provision. As a result, it will reduce the need for residents to commute to Christchurch City, which will in turn reduce fossil fuel use, reduce harmful emissions, and reduce the scope for motor accidents.²⁷
- 38 This is another way in which the Momentum land meets the criteria of a well-functioning urban environment.
- 39 The NPS-UD Objective 8 requires that New Zealand’s urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.

Locally important urban centre

²⁶ Ibid., p.9.

²⁷ *Economic Assessment of Proposed Retirement Village in Kaiapoi*, Insight Economics, 18 July 2023, p.22.

- 40 The Draft Spatial Plan's strategy is to "focus growth through targeted intensification in urban and town centres and along public transport corridors."²⁸
- 41 The Momentum land meets both aspects of the above strategy. Kaiapoi is shown on Maps 2 and 4 of the Draft Spatial Plan as a "locally important urban centre and town" and it is located on a "core public transport route".

Airport Noise Contours

- 42 Although both the North Block and the South Block lie inside of the 2008 50 dBA Ldn airport noise contours for the Christchurch International Airport Limited (**CIAL**), those noise contours have now been remodelled to reflect current and future conditions.²⁹ The North Block lies outside of the remodelled (2022-23) 50 dBA Ldn contour. Although the South Block still lies partially inside of the remodelled (2022-23) 50 dBA Ldn contour, its proposed use as a retirement village should not be prevented by that factor. The certain benefits of residential retirement village development of the South Block far outweigh any potential negative benefits due to airport noise or reverse sensitivity issues.
- 43 Avoidance or prevention of new residential or other urban or land development within the 50 dBA Ldn airport noise contour is not necessary, desirable or justified to ensure the safety and wellbeing of residents, or to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport. The appropriate boundary for that purpose is the 55 dBA Ldn airport Annual Average noise contour, as remodelled in 2022-23.³⁰

Providing sufficient development capacity

- 44 Part 2 of the draft Spatial Plan sets out the guiding directions for an urban environment that enables diverse and affordable housing. Direction 4.4 discusses housing choice and affordability and states that:

²⁸ Draft Greater Christchurch Spatial Plan, p.30.

²⁹ Christchurch Airport Remodelled Contour Independent Expert Panel Report, June 2023.

³⁰ Christchurch Airport Remodelled Contour Independent Expert Panel Report, June 2023, Exhibit 7-1, pp. 7-6.

(A)dditional greenfield development may be required for the longer term and to provide for a population towards one million. Additional greenfield will be assessed through other statutory processes.³¹

45 This statement is contrary to the requirements on local authorities under the NPS-UD (cl.3.13(1)(ii)) to provide **in the FDS** sufficient development capacity in future urban areas that meets the criteria set out in cl. 3.2 and 3.3.

46 Clause 3.3 refers to development capacity for business land, while clause 3.2 refers to sufficient development capacity for housing. These specific types of areas must be plan enabled and capable of meeting expected demand plus the appropriate competitiveness margin.

What is considered sufficient development capacity?

- 47 Clause 3.4(1)(c) provides that development capacity is **plan-enabled** for housing if:
- a in relation to the short term, it is on land that is zoned for housing in an operative district plan
 - b in relation to the medium term, either (a) applies or it is on land that is zoned for housing in a proposed district plan
 - c in relation to the long term, either (b) applies or it is on land identified by the local authority for future urban use or urban intensification in an FDS.

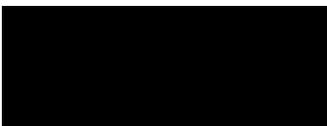
48 By stating that additional greenfield sites will be assessed through other statutory processes, the draft Spatial Plan is not complying with cl.3.4(1)(c). It is the intent of the NPS-UD that future land for housing is identified in a FSD. The Draft Spatial Plan should therefore identify land in the CDP area for future urban use, including Greenfield Priority Areas – Residential and Greenfield Priority Areas - Business. Simply identifying generic Future Urban Development Areas does not provide enough certainty of either type of supply.

³¹ Draft Greater Christchurch Spatial Plan, p.72.

Relief Sought:

- 49 The submitter seeks the following relief:
- 49.1 Confirm the Momentum land as part of the Future Urban Development Area in Kaiapoi; and
 - 49.2 Identify the Momentum land as Greenfield Priority Areas - Residential; and
 - 49.3 Amend Map 2 and Map 14 to reflect the identification of the Momentum land as Greenfield Priority Areas – Residential; and
 - 49.4 Amend Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport.
 - 49.5 Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the Draft Spatial Plan that address the matters raised by Momentum Land Ltd.
- 50 Momentum Land Ltd wishes to be heard in support of this submission.

Dated 21 July 2023



Margo Perpick

Counsel for and on behalf of
Momentum Land Limited

Address for service:

Saunders & Co.



Contact person: Margo Perpick



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 21/07/2023

First name: Margo **Last name:** Perpick

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Balance Developments Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Why:

refer to the attached submission from Balance Developments Limited

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Why:

refer to the attached submission from Balance Developments Limited

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Why:

refer to the attached submission from Balance Developments Limited

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Why:

refer to the attached submission from Balance Developments Limited

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Why (please specify the Priority Area):

refer to the attached submission from Balance Developments Limited

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Why:

refer to the attached submission from Balance Developments Limited

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

refer to the attached submission from Balance Developments Limited

Attached Documents

File

Submission on Draft Greater Chch Spatial Plan -Balance Ltd (Belfast block)

Attachment 1 (Belfast block)

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 21/07/2023

First name: Margo **Last name:** Perpick

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Balance Developments Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Why:

refer to the attached submission from Balance Developments Limited

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Why:

refer to the attached submission from Balance Developments Limited

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Why:

refer to the attached submission from Balance Developments Limited

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Why:

refer to the attached submission from Balance Developments Limited

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Why (please specify the Priority Area):

refer to the attached submission from Balance Developments Limited

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Why:

refer to the attached submission from Balance Developments Limited

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

refer to the attached submission from Balance Developments Limited

Attached Documents

File

Balance submission on Greater Chch Spatial Plan - South Kaiapoi

Attachment 1 - Balance (South Kaiapoi Block)



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

To: Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

Submitter: **BALANCE DEVELOPMENTS LIMITED**

C/- Saunders & Co.,
Attention: Margo Perpick

Proposal: Draft Greater Christchurch Spatial Plan

Regarding: Belfast Block

Address for service of submitter:
c/- Margo Perpick
Saunders & Co



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Name of submitter

- 1 Balance Developments Limited (**Balance Ltd** or the **submitter**).

Proposal to which submission relates

- 2 This submission relates to the Draft Greater Christchurch Spatial Plan (the **Draft Spatial Plan**) in its entirety and particularly those provisions which apply or affect the following property in north Belfast partially owned by Balance Ltd:

- 3 The land parcels subject to this submission are:

- 3.1 Part Lot 4 Deposited Plan 3257; Lot 3-4, 6 Deposited Plan 416719; Lot 1 Deposited Plan 19404; Lot 1-2, 7 Deposited Plan 416719; Lot 5, 8 Deposited Plan 416719; Section 1 Survey Office Plan 540092 and Section 3 Survey Office Plan 540092; Lot 2 Deposited Plan 429808; Lot 5 Deposited Plan 71209 and Lot 1 Deposited Plan 509549; Lot 46 Deposited Plan 644; Lot 1 Deposited Plan 28169; Part Lot 33 Deposited Plan 644; Lot 2 Deposited Plan 29839; Lot 2 Deposited Plan 43669; Part Lot 2 Deposited Plan 3257; Lot 6-7 Deposited Plan 71209; Lot 43-45 Deposited Plan 644; Lot 42 and Part Lot 40-41 Deposited Plan 644.

- 4 The locations of Balance Ltd's landholdings as described above, are shown on the images appended at **Attachment 1**.

- 5 The land referred to above and depicted in Attachment 1 is collectively referred to herein as the **Belfast block**.

- 6 The submitter could not gain an advantage in trade competition through this submission.

Details of submission

- 7 Balance Ltd's submission relates to the Draft Spatial Plan as a whole, but has a specific focus on:

- 7.1 Confirming the Belfast block as part of the existing urban area in the Spatial Plan; and

- 7.2 Identifying the Belfast block as a Greenfield Priority Area – Residential in the Spatial Plan; and

7.3 Amending Map 2 and Map 14 to reflect the change in identification of the land above.

Statement of Interest and Background

8 Balance Ltd is a development company who has agreements pending and agreements reached to purchase the land outlined in paragraph 3, see also Attachment 1, **Table 2**.

The Belfast block

9 The Belfast block is currently:

9.1 identified as Greenfield Priority Area – Business on Map A of Chapter 6 of the Canterbury Regional Policy Statement (the **CRPS**); and

9.2 zoned Industrial General in the Christchurch District Plan (the **CDP**).

10 Balance Ltd plans to develop the Belfast block for residential purposes.

11 A series of location maps are enclosed with the submission in Attachment 1. The aerial photograph at **Figure 1** show the different properties within the Belfast block. The Belfast block is primarily pasture at present, with several farmhouses or farm sheds spread across the larger properties. The exceptions are properties at the southeast end of the Belfast block, which are generally contractors yards (or similar); and market gardens, see Attachment 1, **Figure 2**.

12 The properties in question are shown in **Table 1** of the Attachment 1. **Table 2** shows the status of purchase agreements across each of the seven blocks that collectively comprise the Belfast block. The total area of the Belfast block is approximately 36 ha.

13 **Figure 3** shows that the Belfast block is within the Projected Infrastructure Boundary on Map A in the Canterbury Regional Policy Statement (the **CRPS**). However, Map A identifies the land as a future Greenfield Priority Area - Business rather than Greenfield Priority Area - Residential.

14 The site is connected to the transportation network via Main North Road laying immediately to the west and road access to the south via Tyrone Street. Further to the east lies State Highway 74, being the northern motorway leading to Central Christchurch. The main north railway line runs along the eastern boundary of the site, see **Figure 2**. The site is also connected to the Metro Bus network, see **Figure 4**.

Submission Summary

15 This submission relates to the Draft Spatial Plan as a whole, but has specific focus on:

15.1 The draft Spatial Plan does not currently satisfy the requirements of the National Policy Statement on Urban Development (**NPS-UD**) for a Future Development Strategy (**FDS**), in that it does not:

- a promote long-term strategic planning by setting out how the local authorities intend to:
 - i achieve well-functioning urban environments in their existing and future urban area; and
 - ii provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 of the NPS-UD, over the next 30 years to meet expected demand;¹ and
 - iii assist the integration of planning decisions under the Act with infrastructure planning and funding decisions² and
- b spatially identify the broad locations in which development capacity will be provided over the long term, in both existing and future urban area, to meet the requirements of clauses 3.2 and 3.3 of the NPS-UD³

because it does not provide for the assessment and identification of any Future Urban Development Areas or Greenfield Priority Areas, whether Residential or Business, in the CDP area.

15.2 The draft Spatial Plan does not currently enable well-functioning urban environments in the Greater Christchurch area. Specifically, it makes no provision for Greenfields Residential Development in the CDP area, and so does not:

- a enable a variety of homes that meet the needs, in terms of type, price, and location of different households;

¹ NPS-UD clause 3.13 (1)(a)(i) and (ii).

² NPS-UD clause 3.13 (1)(b).

³ NPS-UD clause 3.13 (2)(a).

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- b have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- c support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- d support reductions in greenhouse gas emissions;
- e enable an urban environment in Christchurch which is resilient to the likely current and future effects of climate change.

16 This submission seeks to:

16.1 Confirm the Belfast block as part of the existing urban area; and

16.2 Identify the Belfast block as a Greenfield Priority Area - Residential; and

16.3 Amend Map 2 and Map 14 to reflect the change in identification of the land, as above.

Submission:

17 Submission Point: The draft Spatial plan does not comply with the requirements of a Future Development Strategy under the NPS-UD because it does not provide for the assessment and identification of additional Future Development Areas or Greenfield Priority Areas – Residential or Business in the Christchurch District Plan area through the Spatial Planning process.

18 The draft Spatial Plan states that it satisfies the requirements of a FDS under the NPS-UD.⁴ However, it does not meet the requirements to provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 over the next 30 years to meet expected demand⁵, nor assist the integration of planning decisions under the Act with infrastructure planning and funding decisions,⁶ because it fails to (as required) spatially identify the broad locations in which development capacity will be provided over the long term, **in both existing and future urban areas**, (our emphasis) to meet the requirement of clauses 3.2 and 3.3.⁷

⁴ Draft Greater Christchurch Spatial Plan, p.23.

⁵ NPS-UD clause 3.13(1)(a)(ii).

⁶ NPS-UD clause 3.13(1)(b).

⁷ NPS-UD clause 3.13(2)(a).

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19 Clause 3.2 requires every tier 1, 2 and 3 local authority to provide **at least sufficient** development capacity in its region or district to meet expected demand for housing:

- a **in existing and new urban areas**; and;
- b **for both standalone dwellings and attached dwellings**; and
- c in the short term, medium term, **and long term**.⁸

In order to be **sufficient** to meet expected demand for housing, the development capacity must be:

- a **plan-enabled**; and
- b **infrastructure-ready**; and
- c **feasible and reasonably expected to be realised**; and
- d meet the expected demand plus the appropriate competitiveness margin.

(our emphasis)

20 Contrary to these requirements, the draft Spatial Plan fails to provide for any housing in new urban areas of Christchurch City, and does not provide for standalone dwellings as well as attached dwellings. Instead, it relies upon intensification and infill of the existing urban area.

21 This will not enable a variety of homes to meet the needs, in terms of type, price and location of different households, particularly for the medium and long terms. As the population of Christchurch City grows over the next 30 years, the number of standalone homes, in relation to the population will fall, making those homes scarcer and therefore less affordable.

22 The draft Spatial Plan also does not provide for good accessibility for all people between housing, jobs, and community services, as people who wish to live in standalone homes and cannot afford the increasingly scarce ones available in Christchurch City will be driven to move to Selwyn and Waimakariri Districts and commute into Christchurch City for employment and services.

⁸ NPS-UD clause 3.2(1)(a)(b) and (c).

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- 23 The draft Spatial Plan incorrectly relies upon the unusual patterns of growth which took place in the years after the Canterbury Earthquakes to project future demand for housing in the Christchurch, Selwyn and Waimakariri Districts. While demand in the latter 2 has been high in that time period, compared to medium in Christchurch City, that has been largely driven by the need to relocate away from areas of Christchurch which were badly affected by the earthquakes, compared to locations in the 2 rural districts. The draft Spatial Plan should not exacerbate the dislocation which has already occurred and embed it as a template for future growth.
- 24 As an FDS, the draft Spatial Plan must spatially identify the broad locations in which development capacity will be provided **over the long term, in both existing and future urban areas**, to meet the requirements of clauses 3.2 and 3.3.⁹ This is a requirement for **each** local authority.¹⁰ The draft Spatial Plan fails to meet this requirement in that the Christchurch City Council has not made provision for development capacity over the long term, in both existing and future urban areas. It is relying solely on the capacity of existing areas to be intensified and infilled. That is not a **feasible and reasonably expected to be realised** source, and therefore not **sufficient**.¹¹
- 25 The contents of the draft Spatial Plan will affect the future contents of planning instruments under the RMA, such as the CRPS and the CDP; Clause 3.17 of the NPS-UD requires every tier 1 and 2 local authority to have regard to the relevant FDS when preparing or changing RMA planning documents. The failure of the draft Spatial Plan to provide for sufficient development capacity in the CDP area will result in those RMA documents also failing to give effect to the NPS-UD.

Well-functioning urban environments

- 26 The Draft Spatial Plan states it provides for a well-functioning urban environment and sets out the criteria for this on p.23, reflecting the content of Policy 1 of the NPS-UD. However, by not allowing for any Future Urban Development Areas, or Greenfields Priority Areas (Residential or Business) in the CDP area, the draft Spatial Plan does not meet several key aspects of Policy 1, which defines well-functioning urban environments as, at a minimum:

- a having or enabling a variety of homes that:

⁹ NPS-UD clause 3.13(2)(a).

¹⁰ NPS-UD clause 3.2 (1)(a) and (b).

¹¹ NPS-UD clause 3.2(2)(c).

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- i meet the needs, in terms of type, price, and location, of different households; and
 - ii enable Māori to express their cultural traditions and norms; and
- b having good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- c supporting, and limiting as much as possible adverse impacts on the competitive operation of land and development markets; and
- d supporting reductions in greenhouse gas emissions; and
- e are resilient to the likely current and future effects of climate change.
- 27 The draft Spatial Plan does not meet the above requirements as it does not provide for any future development capacity for housing within the CDP area. The draft Spatial Plan projects that the feasible capacity of existing zoned land in Christchurch City, over the next 30 years is 94,000 additional households, while the expected demand (with a margin) is 37,500 households over that time frame, and on that basis asserts that there is a large surplus of housing capacity over demand.
- 28 The draft Spatial Plan is overestimating the capacity of existing zoned land in the Christchurch District to provide sufficient development capacity for housing. The draft Spatial plan relies exclusively or heavily on intensification of the existing developed areas through the Medium Density Residential Standards (MDRS).¹² It also assumes that current dwellings and structures will be removed and replaced by new dwellings, in order to maximise the potential of the relevant zones. There are flaws in this approach, which will be addressed below.
- 29 The draft Spatial plan does not enable a variety of homes that meet different needs in terms of price, type, and location, as required by Policy 1(a)(i) of the NPS-UD. Christchurch City has the highest proportion of crowded households in Greater Christchurch,¹³ with one in four Pasifika

¹² The capacity model draws on the maximum theoretical capacity that can be developed on each urban lot, as defined by the rules in Operative and Proposed District Plan, *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.75

¹³ *Research Report - Housing Demand and Need in Greater Christchurch*, Livingston and Associates Ltd, July 2021, p.55.

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people and one in eight Māori living in a crowded dwelling.¹⁴ Pasifika and Māori people prefer 2-3 bedroom + standalone housing.¹⁵ The draft Spatial plan does not currently provide the kind of future housing needed by Pasifika and Māori in Christchurch City and should provide for future greenfield sites to meet this demand.

Infrastructure

30 Relying so heavily or exclusively on intensification of existing areas is likely to cause difficulties for the continued use and upgrading of wastewater and storm water networks in the CDP area. The draft Spatial Plan has not assessed the capacity of installed infrastructure to meet future intensified development. The Christchurch City Council is yet to carry out detailed modelling to assess the capacity to service all plan-enabled and expected capacity within existing residential areas.¹⁶ Whereas for greenfield areas, new infrastructure can be appropriately sized and designed to meet the scale of new neighbourhoods.¹⁷

Demand for standalone dwellings in Christchurch City District

31 The Greater Christchurch Housing Development Capacity Assessment (**Housing Capacity Assessment**) considers the maximum amount of development achievable on residential land in Christchurch City, and asserts that much of this development capacity will not be enabled due to insufficient demand.

32 The above claim is incorrect, as a research report prepared by Livingston and Associates, found there is a demand in Christchurch, but that demand is strongly focussed on standalone dwellings.¹⁸ According to this report, the projected demand for standalone dwellings between 2021 – 2051 is 24,850 units. The demand for multi-unit dwellings in the same time frame is 10,750 units.¹⁹ This data is backed up by engagement carried out with the development sector in Christchurch, as part of the background work for the Draft Spatial Plan. Developers state they prefer to build standalone single and two story dwellings and single and two storey multi-unit complexes in residential areas, as this is where the demand lies.²⁰

¹⁴ *Research Report - Housing Demand and Need in Greater Christchurch*, Livingston and Associates Ltd, July 2021, p.56.

¹⁵ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.37.

¹⁶ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.53.

¹⁷ *Ibid.*, p.53.

¹⁸ *Research Report - Housing Demand and Need in Greater Christchurch*, Livingston and Associates Ltd, July 2021, p.41.

¹⁹ *Ibid.*

²⁰ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.18.

Choice and Competitiveness

- 33 Clause 3.22 of the NPS-UD defines “a competitiveness margin” as “a margin of development capacity, over and above the expected demand that tier 1 and tier 2 local authorities are required to provide, that is required in order to support choice and competitiveness in housing and business land markets.” That is consistent with the Policy 1(d) part of the definition of “well-functioning urban environments” as being ones which “support and limit as much as possible adverse impacts on, the competitive operation of land and development markets”.
- 34 Under the draft Spatial Plan, new residential development in the CDP area would be focussed solely or heavily on intensifying current residentially zoned land, which does not support choice and competitiveness in housing markets and will exacerbate adverse impacts on the competitive operation of land and development markets.

Greenhouse gas emissions

- 35 Map 2 and Map 14 would restrict future urban development of Greater Christchurch to only within the Waimakariri and Selwyn Districts. Forcing future urban development away from Christchurch City and out to the Districts creates urban sprawl and does the opposite of reducing greenhouse gas emissions.
- 36 Many, if not most, of the people who would reside in these district suburbs will likely work, socialise and shop in Christchurch City. Without fast, frequent and cost-effective public transport, future residents will likely drive to Christchurch. This will result in an increase in greenhouse gas emissions. Instead, future greenfield residential locations should be sited to reduce greenhouse gas emissions, by being located close to where people work and close to public transport.
- 37 The draft Spatial Plan proposes that a mass rapid transit service will be implemented, which will be extended to Belfast (see Map 15 of the Spatial plan) in the North and to Hornby in the West. Residences located in Waimakariri and Selwyn Districts would not have access to that service. Having higher density residential development within the walkable catchment of the mass rapid transit service would reduce the number of car trips people make in their daily commute.
- 38 The Belfast Block is located on the outskirts of Belfast and new residential development in this block would be connected to the mass rapid transport service. New residents would be able to

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reduce their carbon emissions by being well connected to carbon-neutral transport in their daily commute to workplaces in Christchurch.

- 39 The draft Spatial Plan states that a well-functioning urban environment should support reductions in greenhouse gas emissions,²¹ reflecting the definition in Policy 1 of the NPS-UD. However, in failing to provide for any future greenfield residential development in the CDP area, the draft Spatial Plan will exacerbate increases in greenhouse gas emissions, rather than support reductions.
- 40 The NPS-UD Objective 8 requires that New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.

Locally important urban centre

- 41 The Draft Spatial Plan's strategy is to "focus growth through targeted intensification in urban and town centres and along public transport corridors."²²
- 42 The Belfast block meets both aspects of the above strategy. Firstly, the Belfast block is located on the northern fringe of Belfast (see Attachment 1, **Figure 1**). The Draft Spatial Plan identifies Belfast as a locally important urban centre.²³ The Draft Spatial Plan supports greater intensification of urban centres in Belfast.

Well connected to public and active transport

- 43 The Belfast block is well connected to existing public transport corridors, such as Main North Rd and SH1 to the west and SH74 to the east. (see Attachment 1, **Figure 4**). The Draft Spatial Plan, in Map 14 also sets out that a Mass Transit Network will be extended to Belfast. Future residents living in the Belfast block will be able to make use of this future Mass Transit Network.

Well integrated with existing urban areas

- 44 The Belfast block is zoned Industrial General in the CDP, see Attachment 1, **Figure 2**). It is surrounded by a mix of other zones. To the south and west is land zoned Residential Suburban, and presents as a logical extension to that zone.

²¹ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.21.

²² Draft Greater Christchurch Spatial Plan, p.30.

²³ *Ibid.*, p.35.

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- 45 To the east is land zoned Industrial General, and land to the northeast and northwest is zoned Rural Urban Fringe. However, due to the low-lying nature of the land and presence of wetlands and springs, the Christchurch City Council have commented that developing this site into an industrial park would be challenging due to requirements under the National Policy Statement on Freshwater Management (**NPS-FM**) and the presence of natural springs and wetlands on this site. Redevelopment into residential areas, with natural waterways set aside as reserves would be better aligned with the objectives and policies of the NPS-FM.
- 46 Future residential growth within Christchurch City is constrained by the airport noise contours, natural hazards from the coast, liquefaction, and the Port Hills. The Belfast block presents a unique opportunity to provide for future residential growth in Christchurch without the above constraints.

Providing sufficient development capacity

- 47 Part 2 of the Draft Spatial Plan sets out the guiding directions for an urban environment that enables diverse and affordable housing. Direction 4.4 discusses housing choice and affordability and states that:

(A)dditional greenfield development may be required for the longer term and to provide for a population towards one million. Additional greenfield will be assessed through other statutory processes.²⁴

- 48 This statement is contrary to the requirements on local authorities under the NPS-UD (cl.3.13(1)(ii)) to provide in the FDS sufficient development capacity in future urban areas that meets the criteria set out in cl. 3.2 and 3.3.
- 49 Cl. 3.3 refers to development capacity for business land. Cl. 3.2 refers to sufficient development capacity for housing and these areas must be plan enabled and capable of meeting expected demand plus the appropriate competitiveness margin.

What is considered sufficient development capacity?

- 50 Clause 3.4(1)(c) provides that development capacity is **plan-enabled** for housing if:

²⁴ Draft Greater Christchurch Spatial Plan, p.72.

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- a in relation to the short term, it is on land that is zoned for housing in an operative district plan
- b in relation to the medium term, either (a) applies or it is on land that is zoned for housing in a proposed district plan
- c in relation to the long term, either (b) applies or it is on land identified by the local authority for future urban use or urban intensification in an FDS

By stating that additional greenfield sites will be assessed through other statutory processes, the draft Spatial Plan is not complying with cl.3.4(1)(c). It is the intent of the NPS-UD that future land for housing is identified in a FSD. The draft Spatial Plan should therefore identify land in the CDP area for future urban use, including Greenfield Priority Areas – Residential.

- 51 The Belfast block is well suited to be identified as a Greenfield Priority Area - Residential for the following the reasons set out in this submission, and will allow for a variety of housing types, due to the size (36 ha) of the block.

Relief Sought

- 52 Balance Ltd seeks the following decision:
- 52.1 Confirm the Belfast block as part of the existing urban area in the Spatial Plan; and
 - 52.2 Identify the Belfast block as a Greenfield Priority Area – Residential in the Spatial Plan; and
 - 52.3 Amend Map 2 and Map 14 in the Spatial Plan to reflect the change in identification of the land above;
 - 52.4 Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the Draft Spatial Plan that address the matters raised by Balance Ltd.
- 53 Balance Ltd wishes to be heard in support of this submission.

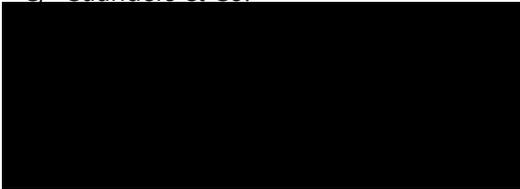
Dated 21 July of 2023



Margo Perpick
Counsel for and on behalf of
Balance Developments Limited

Address for service:

C/- Saunders & Co.



Location Maps: Belfast Block

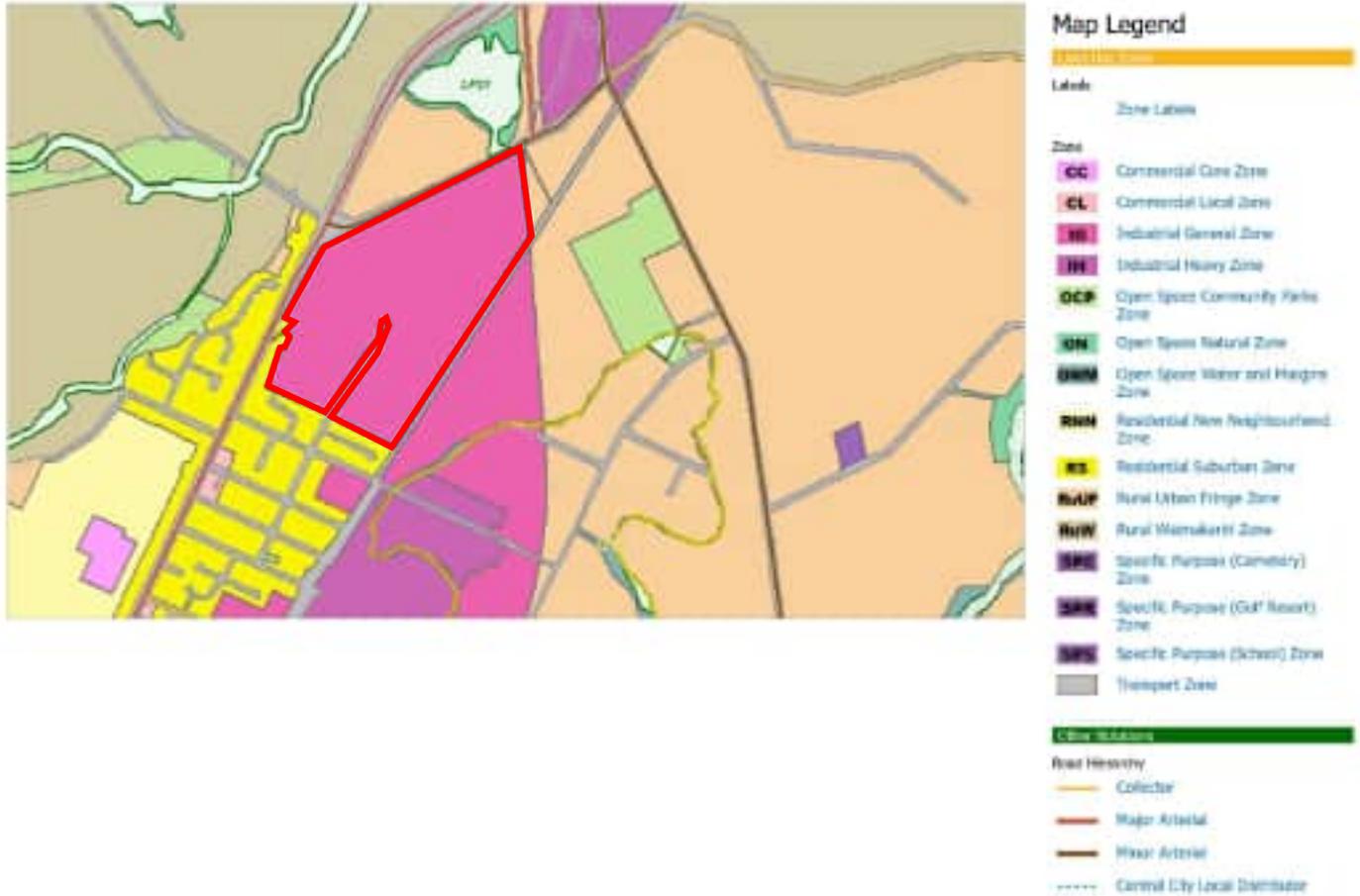
Figure 1 – Aerial image showing the Belfast Block with separate properties outlined in different colours. See the below table for further details of each property.

Block name	Outline colour	Area (ha)	Zoning	Legal Description
Inwood*	Dark green	3.9	Industrial General	Lot 46 DP 644
880 Main North*	Light green	11	Industrial General	In order: Lot 2 DP 29839; Lot 43-45 DP 644; Part Lot 4 DP 3257; Lot 42 and Part Lot 40-41 DP 644.
MG*	Purple	2	Industrial General	In order: Lot 5, 8 DP 416719; Lot 1 DP 19404; Lot 1-2, 7 DP 416719; Lot 3-4, 6 DP 416719
CCC**	Pink	26.2	Industrial General	In order: Lot 5 DP 71209 and Lot 1 DP 509549; Section 1 Survey Office Plan 540092 and Section 3 Survey Office Plan 540092; Lot 6-7 DP 71209;
Natrodale Farm Ltd***	Blue	2.9	Industrial General	In order: Lot 2 DP 43669; Part Lot 2 DP 3257
Hagley Trustees***	Orange	1.5	Industrial General	Lot 2 Deposited Plan 429808
Cattins Trustees***	Red	1.7	Industrial General	In order: Lot 1 DP 28169; Part Lot 33 DP 644

Table 1 - Belfast Block property details

	Agreement status for each property	Area (ha)	Cumulative area
*	Agreement reached for these blocks	17	17
**	Agreement pending for 50% of this block	13	30
***	Agreement pending for these blocks	6	36

Table 2 – Agreement status for each property



<https://data.council.govt.nz/PropertySearch/PropertySearchContainer.html>

Figure 2 - Christchurch District Plan Zoning of the Area, with the Belfast Block outlined in red

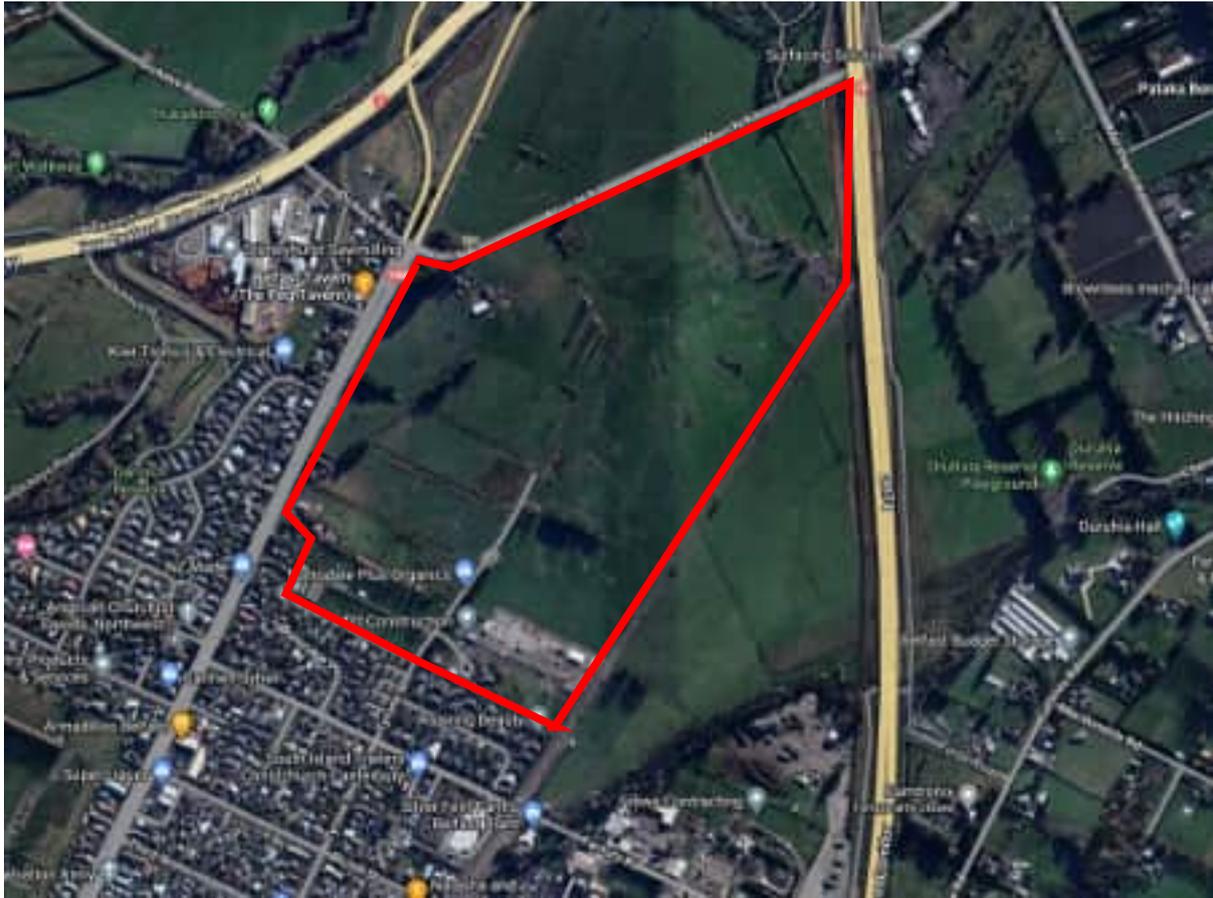


Figure 2. Aerial view from Google Maps, showing current land use (lines are indicative only).

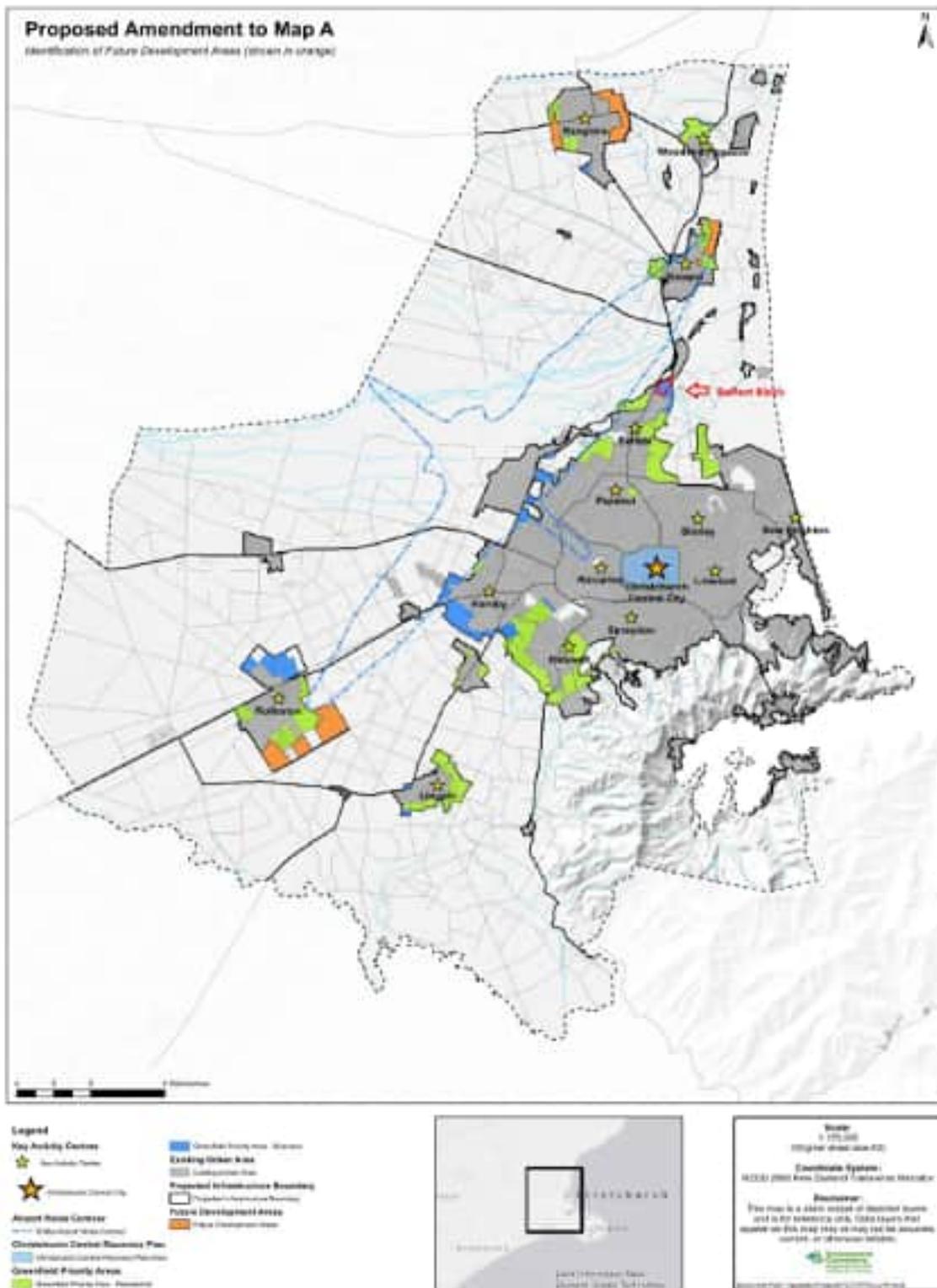


Figure 3 - Map A - Greenfield Priority Areas and Future Development Areas (showing PC1 Amendment, now operative) with Belfast Block outline

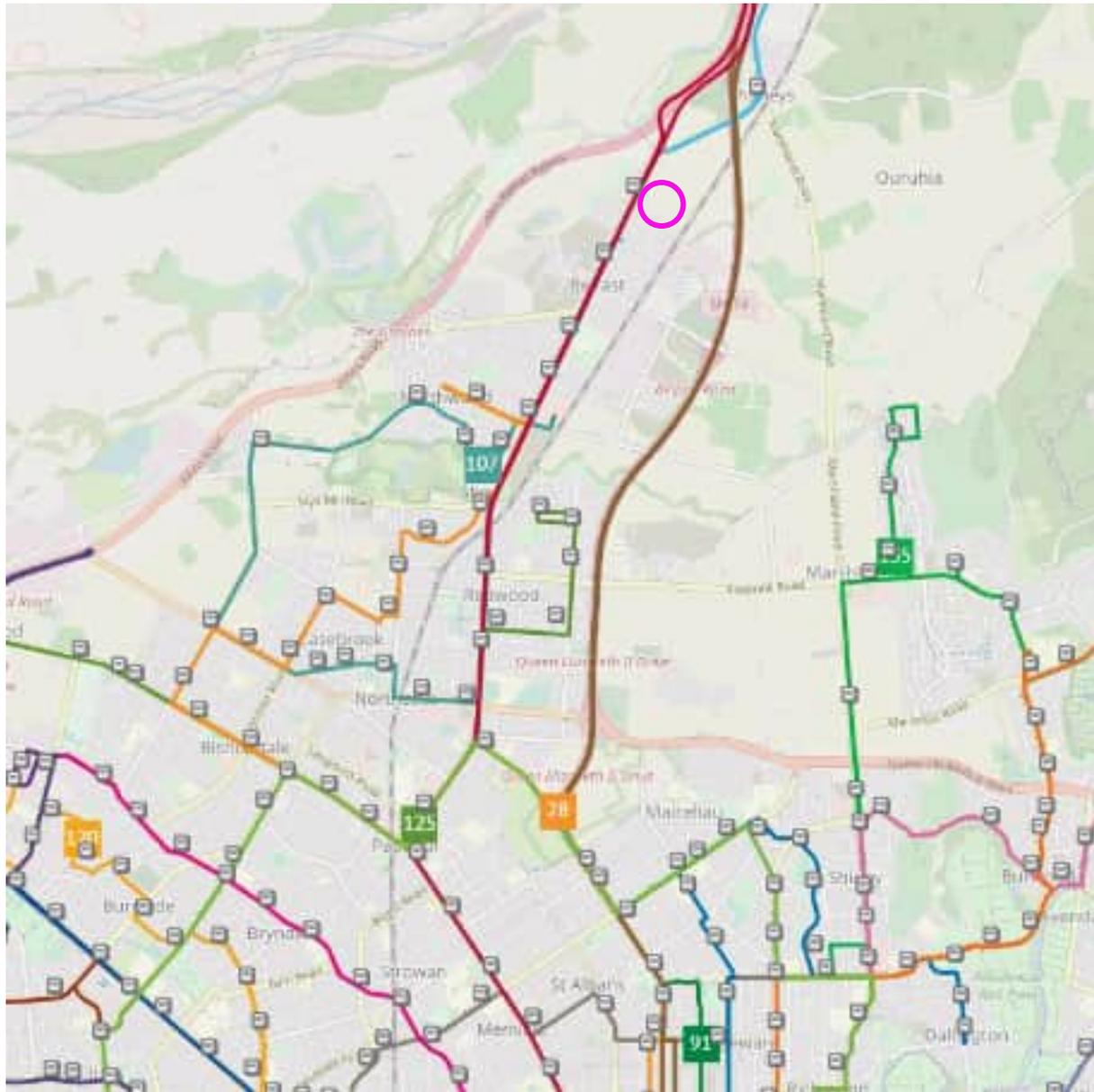


Figure 4 – a wider view of the Metro Bus network showing the proximity of public transport to the Belfast Block, as marked by the pink circle



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

To: Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

Submitter: **BALANCE DEVELOPMENTS LIMITED**

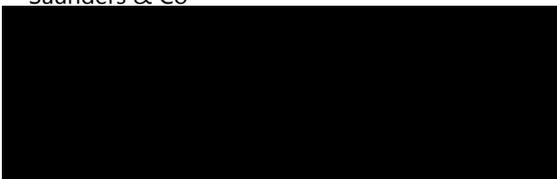
C/- Saunders & Co.,

Attention: Margo Perpick

Proposal: Draft Greater Christchurch Spatial Plan

Regarding: Balance South Kaiapoi Block

Address for service of submitter:
c/- Margo Perpick
Saunders & Co



SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

Name of submitter:

- 1 Balance Developments Limited (**Balance Ltd** or the **submitter**).

Proposal to which submission relates:

- 2 This submission relates to the Draft Greater Christchurch Spatial Plan (the **draft Spatial Plan**) in its entirety and particularly those provisions which apply or affect the following property in South Kaiapoi:
 - 3 The land parcels subject to this submission are:
 - 3.1 Pt RS 37428 (CB701/7) limited to the land to the west of the Main Trunk Railway Line, RS 39673, and Lot 1 DP 19366
 - 4 The locations of Balance Ltd's landholdings as described above, are shown on the image appended at **Attachment 1**.
 - 5 The land referred to above and depicted in Attachment 1 is collectively referred to herein as the **Balance South Kaiapoi Block**.
 - 6 The submitter could not gain advantage in trade competition through this submission.

Details of submission

- 7 Balance Ltd's submission relates to the draft Spatial Plan as a whole, but has a specific focus on:
 - 7.1 Identifying the Balance South Kaiapoi Block as a Future Urban Development Area; and
 - 7.2 Identifying the Balance South Kaiapoi Block as a Greenfields Priority Area - Residential; and
 - 7.3 Amending Map 2 and Map 14 to reflect the change in identification of the land above; and
 - 7.4 Amending Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport

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Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport.

Statement of Interest and Background

- 8 Balance Ltd is a development company which has agreements pending and agreements reached to purchase the land outlined in paragraph 3.

The Balance South Kaiapoi Block

- 9 The Balance South Kaiapoi Block is currently zoned Rural in the Operative Waimakariri District Plan (**OWDP**) and Rural Lifestyle in the Proposed Waimakariri District Plan (**PWDP**)
- 10 Balance Ltd plans to develop the Balance South Kaiapoi Block for residential purposes.
- 11 A series of Location Maps are enclosed with the submission in **Attachment 1**. The aerial photographs at **Figure 1 & Figure 2** show the different properties within the Balance South Kaiapoi Block. The Balance South Kaiapoi Block is primarily pasture at present, with some cropping, a single dwelling in the southwestern corner, and some minor farm buildings. It is bounded by Kaikainui Stream, with an esplanade reserve, to the north, the Main Trunk Railway Line to the east, the Main North Road to the west, and Courtenay Stream to the south. The current southern extent of Kaiapoi's residential area is immediately across the Kaikainui Stream to the north of the Balance South Kaiapoi Block.
- 12 The total area of the Balance South Kaiapoi Block is approximately 14 ha.
- 13 The site is connected to the transportation network via Main North Road lying immediately to the west.

Submission Summary

- 14 This submission relates to the draft Spatial Plan as a whole, but has specific focus on:
- 14.1 In order to satisfy the requirements of the National Policy Statement on Urban Development (**NPS-UD**) for a Future Development Strategy (**FDS**) to:

- 4 -

- a promote long-term strategic planning by setting out how the local authorities intend to:
 - i achieve well-functioning urban environments in their existing and future urban areas¹; and
 - ii provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 of the NPS-UD, over the next 30 years to meet expected demand;² and
 - iii assist the integration of planning decisions under the Act with infrastructure planning and funding decisions³ and
- b spatially identify the broad locations in which development capacity will be provided over the long term, in both existing and future urban area, to meet the requirements of clauses 3.2 and 3.3 of the NPS-UD⁴

the Draft Spatial Plan must identify the Balance South Kaiapoi Block as a Future Urban Development Area and a Greenfield Priority Areas – Residential.

14.2 The draft Spatial Plan does not currently enable well-functioning urban environments in the Greater Christchurch (**GC**) area. Specifically, it does not identify any Greenfields Priority areas - Residential or Business – in the GC area, and so does not:

- a enable a variety of homes that meet the needs, in terms of type, price, and location of different households;
- b have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- c support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- d support reductions in greenhouse gas emissions;

¹ NPS-UD clause 3.13(1)(a)(i).

² NPS-UD clause 3.13(1)(a)(ii).

³ NPS-UD clause 3.13 (1)(b).

⁴ NPS-UD clause 23.13 (2)(a).

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e enable an urban environment in Christchurch which is resilient to the likely current and future effects of climate change.

15 This submission seeks to:

- 15.1 Identify the Balance South Kaiapoi Block as a Future Urban Development Area; and
- 15.2 Identify the Balance South Kaiapoi Block as a Greenfield Priority Area - Residential; and
- 15.3 Amend Map 2 and Map 14 to reflect the change in identification of the land, as above; and
- 15.4 Amend Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport.

Submissions:

- 16 The Draft Spatial plan must comply with the requirements of a Future Development Strategy under the NPS-UD by identifying Greenfield Priority Areas – Residential and Business.
- 17 The Draft Spatial Plan states that it satisfies the requirements of a FDS under the NPS-UD.⁵ However, in order to meet the requirements to provide at least sufficient development capacity, as required by clauses 3.2 and 3.3 over the next 30 years to meet expected demand⁶, and assist the integration of planning decisions under the Act with infrastructure planning and funding decisions,⁷ it must spatially identify the broad locations in which development capacity will be provided over the long term, **in both existing and future urban areas**, (our emphasis) to meet the requirement of clauses 3.2 and 3.3⁸ by identifying Greenfield Priority Areas – Residential and Business.

⁵ Draft Greater Christchurch Spatial Plan, p.23.

⁶ NPS-UD clause 3.13(1)(a)(ii).

⁷ NPS-UD clause 3.13(1)(b).

⁸ NPS-UD clause 3.13(2)(a).

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18 Clause 3.2 requires every tier 1, 2 and 3 local authority to provide **at least sufficient** development capacity in its region or district to meet expected demand for housing:

- a **in existing and new urban areas;** and;
- b **for both standalone dwellings and attached dwellings;** and
- c in the short term, medium term, **and long term.**⁹

In order to be **sufficient** to meet expected demand for housing, the development capacity must be:

- a **plan-enabled;** and
- b **infrastructure-ready;** and
- c **feasible and reasonably expected to be realised;** and
- d meet the expected demand plus the appropriate competitiveness margin (for tier 1 and 2 local authorities).¹⁰

(our emphasis)

19 Contrary to these requirements, the Draft Spatial Plan fails to provide for any Greenfields Priority Areas - Residential in the Greater Christchurch area. Although it provides for some Future Urban Development Areas in Kaiapoi and other towns in Waimakariri District and Selwyn District, the identification of land as a FUDA enables both potential Residential and potential Business uses, and so does not make certain and sufficient provision for either.

20 Failure to identify Greenfields Priority Areas – Residential will result in a failure to enable a variety of homes to meet the needs, in terms of type, price and location of different households, particularly for the medium and long terms. Reliance on infill housing and intensification will mean that, as the population of Kaiapoi grows over the next 30 years, the number of standalone homes, in relation to the population will fall, making those homes scarcer and therefore less affordable. Identifying the Balance South Kaiapoi Block as Greenfields Priority Areas – Residential is necessary to meet the expected demand for a variety of homes in Kaiapoi over the medium to long term.

⁹ NPS-UD clause 3.2(1)(a)(b) and (c).

¹⁰ NPS-UD clause 3.2(2)(a)(b) and (c).

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- 21 Identifying the Balance South Kaiapoi Block as Greenfields Priority Areas – Residential would also provide for good accessibility for people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport.
- 22 As an FDS, the Draft Spatial Plan must spatially identify the broad locations in which development capacity will be provided **over the long term, in both existing and future urban areas**, to meet the requirements of clauses 3.2 and 3.3.¹¹ The Draft Spatial Plan fails to meet this requirement in that it does not identify Greenfields Priority Areas – either Residential or Business. In relation to Kaiapoi, the Draft Spatial Plan has not made provision for development capacity over the long term, **in both existing and future urban areas**, as the Future Urban Development Area is not specific as to the amount of Residential and Business use that will eventuate. Also, the Draft Spatial Plan is relying too heavily on the capacity of existing areas to be intensified and infilled. That is not a **feasible and reasonably expected to be realised** source, and therefore not **sufficient**.¹²
- 23 The contents of the Draft Spatial Plan will affect the future contents of planning instruments under the RMA, such as the CRPS and the PWDP; Clause 3.17 of the NPS-UD requires every tier 1 and 2 local authority to have regard to the relevant FDS when preparing or changing RMA planning documents. The failure of the Draft Spatial Plan to provide for sufficient development capacity in Kaiapoi is likely to result in those RMA documents also failing to give effect to the NPS-UD.

Well-functioning urban environments

- 24 The Draft Spatial Plan states that it provides for a well-functioning urban environment, and sets out the criteria for this on p.23 of the Plan, reflecting the content of Policy 1 of the NPS-UD. To the contrary, by not allowing for any Greenfields Priority Areas (Residential or Business) in the Kaiapoi area, the Draft Spatial Plan does not meet several key aspects of Policy 1, which defines well-functioning urban environments as, at a minimum:
- a having or enabling a variety of homes that:
 - i meet the needs, in terms of type, price, and location, of different households;
 - and

¹¹ NPS-UD clause 3.13(2)(a).

¹² NPS-UD clause 3.2(2)(c).

- 8 -

- ii enable Māori to express their cultural traditions and norms; and
 - b having good accessibility for people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - c supporting, and limiting as much as possible adverse impacts on the competitive operation of land and development markets; and
 - d supporting reductions in greenhouse gas emissions; and
 - e are resilient to the likely current and future effects of climate change.
- 25 The Draft Spatial Plan does not meet the above requirements as it does not provide for any Greenfields Priority Areas - Residential within the Kaiapoi area. The Draft Spatial Plan projects that the feasible capacity of the Waimakariri District, over the next 30 years, is 14,450 additional households, while the expected demand (with a margin) is 13,250 households over that time frame, and on that basis asserts that there is a small surplus of housing capacity over demand (350 in the medium term and 1200 in the long term).¹³
- 26 The Draft Spatial Plan has not provided any assessment of feasible housing capacity or housing demand in Kaiapoi, and has simply assessed the whole of the Waimakariri District as if it is one housing market. As Kaiapoi is the closest Waimakariri town to Christchurch, the demand for housing is likely to be greater in Kaiapoi than in Waimakariri overall, so deficits of housing capacity to meet demand are more likely to result in Kaiapoi.
- 27 In making its capacity and demand assessments for the Waimakariri District, the Draft Spatial Plan overestimates capacity and underestimates demand. In relation to demand, it estimates 5600 households in the medium term (ie average 560 households per year for 10 years, including margin) and 13250 household in the long term (ie average 442 households per year for 30 years, including margin), but Waimakariri District building consents averaged more than 700 per year for the 5 years up to 2022, and more than 570 per year over the last 30 years.¹⁴
- 28 In relation to feasible capacity, the Draft Spatial Plan overestimates capacity in the following ways:

¹³ Draft Greater Christchurch Spatial Plan, p.69.

¹⁴ A report by Insight Economics has been included in the submission of Momentum Land Limited. This Insight Economics report is relied upon by Balance, in relation to its general critique of the GCUDP HBA, p.10.

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- 28.1 It assumes that, in existing greenfields areas, 75% of land will be available for development, and in FUDAs, 100% of land will be available for development. The actual yields of recent developments (taking into account land used for infrastructure and commercial uses) are 60 - 65% for greenfields and 85% for FUDAs.¹⁵
- 28.2 It assumes an unrealistically low development margin of 6.6%, rather than the usually required development margin of at least 20%.¹⁶
- 28.3 It fails to take account of the effect of the National Environmental Standards on Freshwater (**NES-FW**) which negatively affects the development potential of greenfields areas and FUDAs, particularly areas which are low-lying and flood-prone, as is the case throughout most of the eastern parts of the Waimakariri District, where development is most likely to take place.¹⁷
- 28.4 It assumes house prices, building costs and official cash rates from 2020/21, all of which have changed markedly since then, in ways which discourage the development of housing supply compared to that time.¹⁸
- 28.5 It fails to take account of the following factors which mean that likely market supply of homes will fall short of the calculated feasible capacity:¹⁹
- a Developer intentions: not all landowners have clear intentions to develop their land in the short-medium-long terms, nor to sell their land to others who may wish to develop it.
 - b Tax implications: greenfield land-owners are liable for taxes on recent land value uplifts caused by rezoning, these taxes being greatest in the first year following the rezoning, but gradually diminishing over time and then ceasing 10 years later. This can cause land to be withheld from the market for up to a decade.
 - c Land banking and drip-feeding: Some landowners intend to develop in the future, but are currently withholding supply to capitalise on inevitable land price inflation, while some are drip-feeding supply to maintain prices and maximise returns.

¹⁵ Insight Economics report, pp. 11 & 30,

¹⁶ Ibid., p.31.

¹⁷ Ibid., p.11.

¹⁸ Ibid., p.12.

¹⁹ Ibid., p.14.

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- d Site constraints: the estimates of feasible capacity consider only some infrastructure site constraints while ignoring others such as power and telecommunications, and also overlook other factors that affect developability, such as contamination or awkward site shape/topography.
- e Operational capacity: some landowners face operational capacity constraints, which limit the number of new residential lots that they can supply per annum.
- f Financing: similarly, some landowners face capital/financing constraints that also limit their ability to supply.

29 Given these various market forces, it follows that actual market supply will only ever be a modest proportion of feasible capacity, and that reliance on “just enough” feasible capacity to meet demand will invariably lead to significant and prolonged market shortages.

30 The Draft Spatial Plan estimates of feasible capacity also overestimate the impacts of the medium density residential standards (**MDRS**) in that:²⁰

- a Much of the existing zoned urban area in Waimakariri District is already built out, and in Kaiapoi, is relatively new.
- b The rate of intensification which can be achieved is limited by the capacity of existing infrastructure networks. The Council is yet to carry out detailed modelling to assess the capacity to service all plan-enabled and expected capacity within existing residential areas.²¹ Whereas for greenfield areas, new infrastructure can be appropriately sized and designed to meet the scale of new neighbourhoods.²²
- c In provincial districts such as Waimakariri, there is currently only limited demand for the intensified types of housing enabled by MDRS. Housing consents in the Waimakariri District over the last decade were 88% stand-alone dwellings, only 7% flats/units/duplexes and 5% retirement units (of which there has been and still is a shortage of supply to meet the demand in the District).
- d Maori and Pasifika people prefer 2-3 bedroom + standalone housing.²³

²⁰ Insight Economics Report, p.15.

²¹ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.53.

²² *Ibid.*, p.53.

²³ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.37.

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e Engagement carried out with the development sector in Christchurch, as part of the background work for the Draft Spatial plan, showed that developers prefer to build standalone single and two story dwellings and single and two storey multi-unit complexes in residential areas, as this is where the demand lies.²⁴

31 Currently, there is little greenfields land available for development in Kaiapoi, with the Beach Grove development being the only significant undeveloped land left in the town. 300 lots have already been developed in Beach Grove, with a further 100 currently underway, leaving only a further 200 lots to be developed in 2023/24, after which there will be no more greenfield land to accommodate ongoing growth in demand for living in Kaiapoi. New areas like the Balance South Kaiapoi Block need to be opened up as soon as possible to keep pace with demand.²⁵

Choice and Competitiveness

32 Clause 3.22 of the NPS-UD defines “a competitiveness margin” as “a margin of development capacity, over and above the expected demand that tier 1 and tier 2 local authorities are required to provide, that is required in order to support choice and competitiveness in housing and business land markets.” That is consistent with the part of the definition, in Policy 1(d) of the NPS-UD, of “well-functioning urban environments” as being ones which “support and limit as much as possible adverse impacts on, the competitive operation of land and development markets”.

33 The capacity requirements of the NPS-UD are minima, not targets, and they must be achieved “at all times”. Even if a Council appears to have “sufficient” capacity to meet demand, that does not negate the benefits of providing more. The opposite is generally true. All other things being equal, the greater the capacity provided, the greater the degree of land market competition and the more efficiently the market operates (for the wider benefit of the community). The risks of an oversupply typically pale in comparison to those of an undersupply if the cost and risk of providing the necessary infrastructure can be shifted onto developers, which is normally the case for greenfield developments.²⁶

34 The identification of the Kaiapoi South Block as part of the Future Urban Development Area in Kaiapoi will help create additional Medium Density zoning over this block of land and will

²⁴ *Greater Christchurch Housing Development Capacity Assessment*, March 2023, p.18.

²⁵ *Insight Economics Report*, p.7.

²⁶ *Ibid.*, p.9.

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enable forms and densities of residential development which will provide improved choice for housing availability in Kaiapoi. This is achieved by having larger areas available for reserves (adjoining the Kaikainui and Courtenay Streams and the railway line) which compensates residents for the lack of open areas and visual relief associated with higher density development.

Greenhouse gas emissions

- 35 Development of the Balance South Kaiapoi Block will help create critical mass for a range of local services in Kaiapoi. This is important, because the town and the wider Waimakariri district are currently very reliant on Christchurch City to supply a wide range of everyday household goods and services. Marketview (electronic transaction) data provided by the Council has shown that nearly half of all Waimakariri district resident spending on core retail goods and services leaked out to Christchurch City in 2019. The development of the Balance South Kaiapoi Block, along with existing residents and the future residents of other growth areas, will provide critical mass to gradually improve the viability of local service provision. As a result, it will reduce the need for residents to commute to Christchurch City, which will in turn reduce fossil fuel use, reduce harmful emissions, and reduce the scope for motor accidents.²⁷
- 36 This is another way in which the Balance South Kaiapoi Block meets the criteria of a well-functioning urban environment.
- 37 The NPS-UD Objective 8 requires that New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.

Locally important urban centre

- 38 The Draft Spatial Plan's strategy is to "focus growth through targeted intensification in urban and town centres and along public transport corridors."²⁸
- 39 The Balance South Kaiapoi Block meets both aspects of the above strategy. Kaiapoi is shown on Maps 2 and 4 of the Draft Spatial Plan as a "locally important urban centre and town" and it is located on a "core public transport route".

²⁷ Insight Economics Report, p.22.

²⁸ Draft Greater Christchurch Spatial Plan, p.30.

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- 40 The proposed development area is located relatively close to key community infrastructure such as the high school, the primary school and a small commercial hub on Williams Street containing dentists and similar services. This proximity is similar or better than a number of sectors of Kaiapoi town.
- 41 With regard to community infrastructure and employment within Christchurch City, residential development in South Kaiapoi provides the closest possible location in Waimakariri District to accessing these services. It therefore meets the requirements of good accessibility in the NPS-UD.

Airport Noise Contours

- 42 Although the Balance South Kaiapoi Block lies inside of the 2008 50 dBA Ldn airport noise contours for the Christchurch International Airport Limited (**CIAL**), those noise contours have now been remodelled to reflect current and future conditions.²⁹ The Balance South Kaiapoi Block lies outside of the remodelled 50 dBA Ldn contour.
- 43 Avoidance or prevention of new residential or other urban or land development within the 50 dBA Ldn airport noise contour is not necessary, desirable or justified to ensure the safety and wellbeing of residents, or to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport. The appropriate boundary for that purpose is the 55 dBA Ldn airport Annual Average noise contour, as remodelled in 2022-23.³⁰
- 44 At any rate, the certain benefits of residential development of the Balance South Kaiapoi Block far outweigh any potential negative benefits due to airport noise or reverse sensitivity issues.

National Policy Statement on Highly Productive Land (**NPS-HPL**)

- 45 Although about one third of the Balance South Kaiapoi Block is mapped as having Class 1w1 soil and about two-thirds of the Block has Class 3s5 soil, the NPS-HPL does not prevent its identification as Future Urban Development Area and Greenfields Priority Area – Residential, because the Balance South Kaiapoi Block is subject to a Council initiated notified plan change / review to rezone it from General Rural to Rural Lifestyle.
- 46 At any rate, use of the Balance South Kaiapoi Block for residential purposes:

²⁹ Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023.

³⁰ Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, Exhibit 7-1, p. 7-6.

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- 46.1 Is required to provide sufficient development capacity to meet the demand for housing land to give effect to the NPS-UD; and
- 46.2 There are no other reasonably practicable and feasible option for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and
- 46.3 The environmental, social, cultural and economic benefits of using the Block for residential purposes outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

Providing sufficient development capacity

- 47 Part 2 of the Draft Spatial Plan sets out the guiding directions for an urban environment that enables vch and affordable housing. Direction 4.4 discusses housing choice and affordability and states that:

(A)dditional greenfield development may be required for the longer term and to provide for a population towards one million. Additional greenfield will be assessed through other statutory processes.³¹

- 48 This statement is contrary to the requirements on local authorities under the NPS-UD (cl.3.13(1)(ii)) to provide **in the FDS** sufficient development capacity in future urban areas that meets the criteria set out in cl. 3.2 and 3.3.
- 49 Clause 3.3 refers to development capacity for business land, while clause 3.2 refers to sufficient development capacity for housing. These specific types of areas must be plan enabled and capable of meeting expected demand plus the appropriate competitiveness margin.

What is considered sufficient development capacity?

- 50 Clause 3.4(1)(c) provides that development capacity is **plan-enabled** for housing if:

³¹ Draft Greater Christchurch Spatial Plan, p.72.

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- a in relation to the short term, it is on land that is zoned for housing in an operative district plan
 - b in relation to the medium term, either (a) applies or it is on land that is zoned for housing in a proposed district plan
 - c in relation to the long term, either (b) applies or it is on land identified by the local authority for future urban use or urban intensification in an FDS.
- 51 By stating that additional greenfield sites will be assessed through other statutory processes, the draft Spatial Plan is not complying with cl.3.4(1)(c). It is the intent of the NPS-UD that future land for housing is identified in a FSD. The Draft Spatial Plan should therefore identify land in the CDP area for future urban use, including Greenfield Priority Areas – Residential and Greenfield Priority Areas - Business. Simply identifying generic Future Urban Development Areas does not provide enough certainty of either type of supply.

Relief Sought:

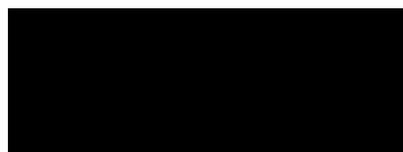
- 52 Balance Ltd seeks the following relief:
- 52.1 Identify the Balance South Kaiapoi Block as part of the Future Urban Development Area in Kaiapoi; and
 - 52.2 Identify the Balance South Kaiapoi Block as Greenfield Priority Areas - Residential; and
 - 52.3 Amend Map 2 and Map 14 to reflect the identification of the Balance South Kaiapoi Block as Future Urban Development Area and Greenfield Priority Areas – Residential; and
 - 52.4 Amend Map 9 and Map 5 to remove the 50 dBA Ldn Christchurch International Airport noise contour, and instead show only the 55 dBA Ldn Christchurch International Airport Annual Average noise contour, as remodelled and shown in the Christchurch Airport Remodelled Contour Independent Expert Panel Report June 2023, as the Airport Noise Control boundary within which urban development should be avoided to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of the Christchurch International Airport; and

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52.5 Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the Draft Spatial Plan that address the matters raised by Balance Ltd.

53 Balance wishes to be heard in support of this submission.

Dated 21 July 2023

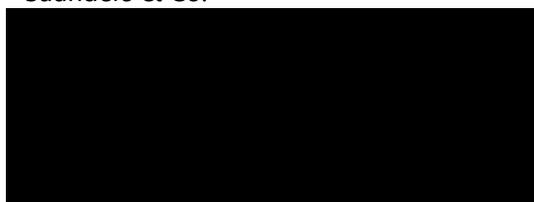


Margo Perpick

Counsel for and on behalf of
Balance Developments Limited

Address for service:

Saunders & Co.



Attachment 1



Figure 1 – Aerial view of Balance South Kaipoi Block

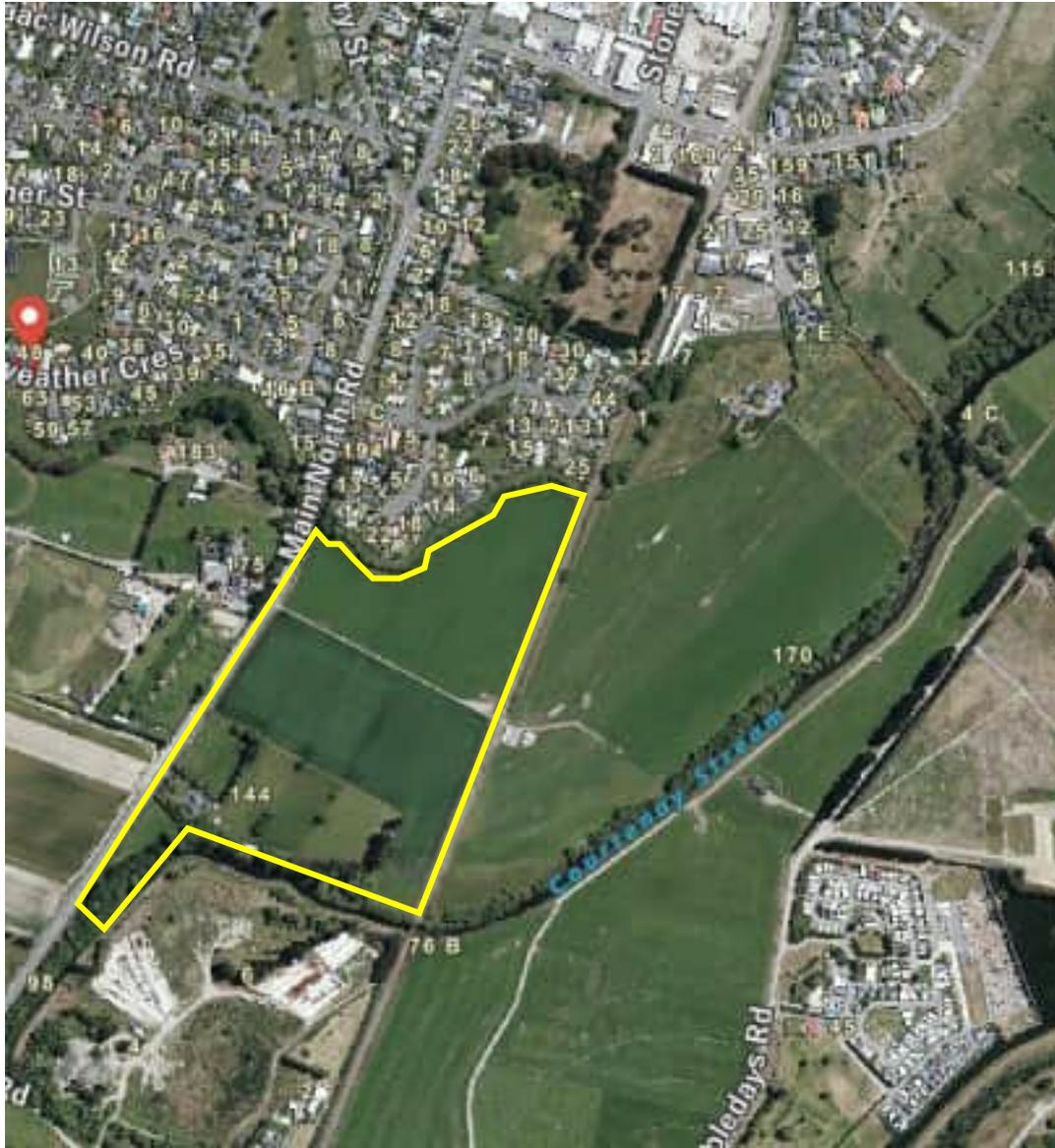


Figure 2 – aerial view of the block, showing the predominance of pasture, a single dwelling in the southwestern corner and a small farm building/shed

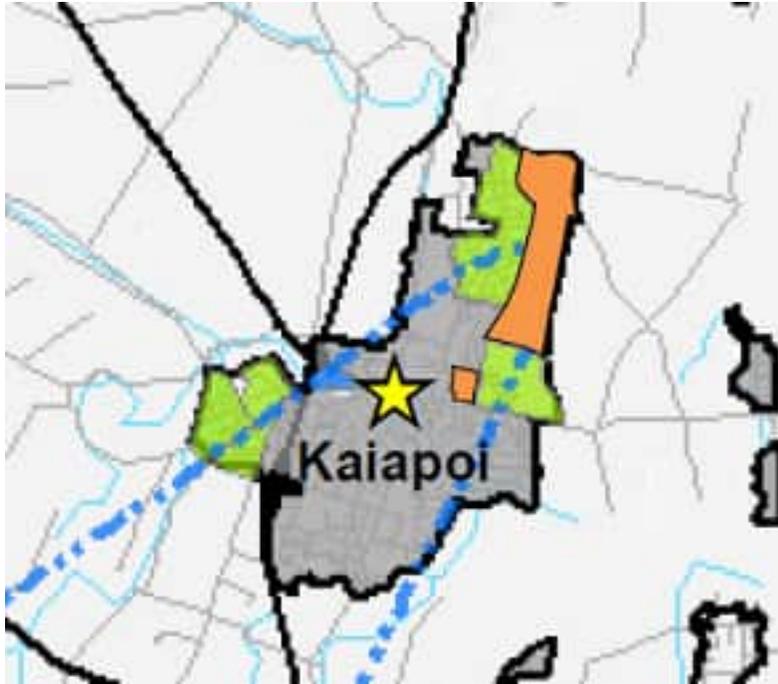


Figure 4- closer view of Kaiapoi within Map A

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Susanne **Last name:** Antill

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)



1

Do you support the improved public transport system proposed in the draft Spatial Plan?

No

Why:

I don't agree to the Harewood Road cycleway or other routes which exclude cars and parking.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

No

Why:

I strongly disagree with anything that destroys the old established character and buildings of Christchurch.

I strongly disagree with high rise, high density housing which alienates Christchurch residents and is designed for a huge immigration of men from overpopulated countries where there is an imbalance of men to women.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

No

Why:

I support Christchurch existing living, where people in Christchurch can grow their own gardens and have pets and hens.

I note that Christchurch City Council has had no regard for the green spaces around Styx Mill Road where productive land is now filled with housing.

So no regard was taken here of green spaces and productive horticultural areas!

Christchurch citizens have traditionally lived in a very environmental and ecological way. They have lived in harmony with nature.

They have not overpopulated.

I do not support a huge influx of new immigrants in Christchurch as the WEF and the United Nations are proposing for Christchurch.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

No

Why:

I like the existing parks and character of Christchurch which have been established over the last couple of centuries for Christchurch citizens.

This proposal would be an artificial construct imposed on Christchurch residents.

This is all social engineering from top down.

It has not taken any concern for Christchurch residents.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

No

Why (please specify the Priority Area):

Development should be incremental and organic by the residents of Christchurch and the surrounding area.

And not imposed top down by self entitled beaurocrats whose allegiance is not with the citizens of this area or New Zealand, and who are for massive overseas immigration from overpopulated countries.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

No

Why:

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

I totally disagree with all aspects of this spatial plan.

Christchurch does not need more population, particularly as the job has injured and made young

New Zealanders infertile.

We do not need a huge influx of overseas immigrants.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Susanne **Last name:** Antill

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

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They have not overpopulated.

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to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Okirano **Last name:** Tilaia

Your role in the organisation and the number of people your organisation represents:

GC2050 Facilitator - 5 young people from University of Canterbury/Ara

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

I really like the idea of a mass rapid transport system and I think this would be really good for the development of Christchurch, especially with the population increasing drastically. I grew up in Wellington and it was common for most people to catch the train. It was often preferred over driving. All people of all ages would take public transport over driving into the city. I noticed a considerable difference when moving to Christchurch and finding that most people drove everywhere. I think if a mass rapid transport system was introduced, it would change the culture around public transport and more people would be encouraged to use it. This has great flow on effects for the environment since we would be releasing less green house gases into the environment (achieving opportunity 6, as well as 2 and 3). I live in Riccarton so the route works well for me, but when thinking broader, I think it would be great if the route could potentially introduce more lines in the future, reaching different suburbs to encourage and incentivise more people to also use public transport over cars.

1) Careful with rain, people who get off the MRT should be able to access a dry location otherwise people might not use the system

2) MRT system must have TWO type of transport in the long run, rapid and slower, the rapid transport should link larger areas, like City centre, malls, University etc, Airport! the slower transport would be similar to the bus services with close stops to one another, worth including parks and heritage sites so it is easier for all the access (where appropriate). If the two services are not introduced people will not use the trams because it's either too slow or too far to walk.

3) The card system (RFID) and website must work day one without issues, please look into Google wallet and apple wallet like card solutions, people like using phones over cards

4) Free Internet on trams is a must, this is difficult to implement but necessary. (This gives another reason over cars)

5) People will damage trams very quickly, take this into account

6) Implementation MRT system is phases, note that each phase will have a notable impact on the local communities, I.E. connecting Hornby to city centre and Riccarton, will impact the, the livability on Hornby for anyone without a car. Places close to the station will have prices increase.

7) Planting trees around infrastructure where possible it makes the areas feel more green

8) work with local Iwi's when designing spaces, and Integrate transport solutions into the designed spaces (this will give the transportation more character)

9) Careful with High density housing in creating cluster of high density housing connected to the city by RTM, these houses CAN overwhelm the system and cause challenges, especially with the local areas doesn't have good amenities.

10) Add more bike lanes, bike storage, especially at larger tram stops, as well as a bike renting system FULLY integrated with the tram system.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Yes

Why:

I think it is good that priority areas have been identified in the plan, and identified for specific reasons. I think that it is incredibly important that the areas identified as being a priority to fulfil the obligation to Te Tiriti, aren't overlooked and remain a priority especially when the council might start looking to prioritise the development areas when the population continues to increase.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

I like the idea of a blue-green network and I think it is really important that certain areas are retained, even though the pressure to develop more housing will increase. I think Hagley Park is really important to the city, and the image of being a "Garden City". I think that some of the areas which have been red zoned, and can't be built on, could be used to provide more green spaces. I believe this would be a good utilisation of the space.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes

Why (please specify the Priority Area):

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)





1.6 Do you agree with the draft spatial strategy outlined above?

Yes

Why:

I like that there have been clear opportunities identified in the spatial plan that will hold the council accountable to achieving these aims. I think these opportunities have clear themes across them, as well as a bit of overlap which reveals the aims that are most important. It seems that the retention and protection of the environment from climate change is a clear concern and priority. This comes across in opportunities 2 and 3, as well as an environmental theme being present in the sustainable transport opportunity (opportunity 6). For me, one of the most important opportunities is opportunity 1. This opportunity identifies that the council will protect, restore and enhance sites that are significant to Māori. I think this opportunity is incredibly important because of the mistrust between Māori and government bodies from past grievances. Although there is nothing that can fully remedy the wrongs that have been done, it is of utmost importance that, moving forward, the Council protects Māori land from being built on or overtaken because of urbanisation in the Greater Christchurch region. I also think that the goals to prioritise sustainable transport choices is very significant. I think public transport in Christchurch could be greatly improved, and this would incentivise myself and others to take public transport rather than to drive everywhere.

Attached Documents

File

No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Anne **Last name:** Scott

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Spokes Canterbury

Your role in the organisation and the number of people your organisation represents:

Submissions Coordinator

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Yes

Why:

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
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The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes

Why (please specify the Priority Area):

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Yes

Why:

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?
See submission below.

Attached Documents

File
Spokes-Greater-Christchurch-Spatial-Plan-2023-07



Draft Greater Christchurch Spatial Plan

Submission from Spokes Canterbury

Reference: <https://ccc.govt.nz/the-council/haveyoursay/show/607>

Tēnā koutou katoa

Thank you for the opportunity to comment on the draft Greater Christchurch Spatial Plan.

Introduction

Spokes Canterbury (<http://www.spokes.org.nz/>) is a local cycling advocacy group with approximately 1,200 followers. Spokes is affiliated with the national Cycling Action Network (CAN – <https://can.org.nz/>). Spokes is dedicated to including cycling as an everyday form of transport in the greater Christchurch and Canterbury areas. Spokes has a long history of advocacy in this space including writing submissions, presenting to councils, and working collaboratively with others in the active transport space. We focus on the need for safe cycling for those aged 8 to 80.

General

Spokes Canterbury:

1. Agrees with the proposed direction of the draft Greater Christchurch Spatial Plan to focus growth around key urban and town centre and along public transport routes however we believe there is an opportunity to also strengthen the relationships between active and public transport which both need to work in harmony together to deliver the expected outcomes.
2. Agrees with the proposed route for the proposed MRT.
3. Agrees with the development of blue/green spaces, corridors and the green belt, that also have good active transport connections.
4. Agrees with the focus on high density areas that facilitate and encourage cycling and walking rather than the current urban sprawl where vehicles dominate.
5. Prefers development areas to be permeable allowing for active transport to easily and safely traverse reasonably direct routes to services
6. Expects the transport plan to complement and enhance the existing cycle network.

Do you support the improved public transport system?

Yes.

Spokes supports a **bus** MRT system for the following reasons

1. There are no tracks that need to be crossed by cyclists or pedestrians which reduces the number of potential accidents.
2. A bus MRT is cheaper and faster to build.
3. It is more flexible. In an emergency as it can be re-routed. This could be for any number of reasons including accident, fire, flood, road-works or earthquakes.

4. Automation will allow a greater variety of bus services to be part of the MRT that can come and go as needed. Rail is far less flexible.

Spokes envisages that for the section Papanui to Church Corner cars would be replaced on street (ie no cars or parking allowed) by the MRT in the centre of the road and the remaining road would be available for cycling (including a separated lane), pedestrians and other forms of active transport, emergency vehicles and maybe some limited form of delivery to businesses at set hours.

There is an assumption that people will live very close to the MRT and that their destination will also be close to a stop. This will be true for a percentage of people but there will be a large number who will need to travel further at one or more ends of their journey. An inability to take you bike with you limits transport choices. Micro-mobility options such as rental e-scooters are seen as a solution but have significant disadvantages. There is a risk that a scooter will not be available for rent at the end of travel when needed. Technically you need to be over 18 to use the service. It is expensive and is highly likely to cost more than the MRT service for each journey. Older people have low usage rates of rentals.

Spokes strongly supports the ability to take bikes (including e-bikes) on the MRT services as on the current Metro services. Spokes does not agree with the concern about the time taken to load and unload a bike onto the bus MRT as it is normally quite fast. There could be a special compartment for bikes and other forms of active transport at the back of the bus where these could be wheeled in and out. You can take bikes on many international MRT systems.

MRT needs to be more convenient than travelling by car but the average time does not need to equate to a car travelling at a particular speed, and it should include the time taken to park and walk to your destination. A MRT can be made more desirable by requiring vehicles to travel a less direct route, providing limited paid parking options for vehicles, providing wifi on the MRT, ensuring the MRT is comfortable and safe, and carefully choosing convenient stops.

[Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?](#)

Yes.

There are significant health benefits in living in close proximity to the natural environment. These areas should be accessible by cycling and walking.

Anne Scott
Submissions Co-ordinator
Spokes Canterbury



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: Paul **Last name:** McMahon

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Waitai Coastal-Burwood-Linwood Community Board

Your role in the organisation and the number of people your organisation represents:

Chairperson

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Unsure

Why:

The Community Board has a number of concerns we wish to raise with the panel.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Yes

Why:

The Community Board has a number of issues and concerns we wish to raise with the panel.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Unsure

Why:

The Community Board has a number of issues and concerns we wish to raise with the panel.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Unsure

Why:

The Community Board has a number of issues and concerns we wish to raise with the panel.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Partially

Why (please specify the Priority Area):

The Community Board has a number of issues and concerns we wish to raise with the panel.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Unsure

Why:

The Community Board has a number of issues and concerns we wish to raise with the panel.

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

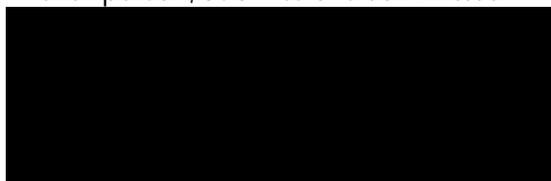
The Community Board has a number of issues and concerns we wish to raise with the panel.

Attached Documents

File

No records to display.

SUBMISSION TO: Greater Christchurch Partnership
ON: Greater Christchurch Spatial Plan
BY: Waitai Coastal-Burwood-Linwood Community Board
CONTACT: Paul McMahon
Chairperson, Submissions Committee



1. INTRODUCTION

The Waitai Coastal-Burwood-Linwood Community Board appreciates the opportunity to make a submission to the Greater Christchurch Partnership on the Greater Christchurch Spatial Plan.

The Board wishes to be heard in support of this submission.

2. SUBMISSION

1. Do you support the improved public transport system proposed in the draft Spatial Plan?

Unsure

The Board is generally supportive of the proposed public transport system.

However, the Board wishes to see provision of Mass Rapid Transit services eventually extended to the East of the city.

Any areas of residential intensification must have good access to reliable public transport.

The Board wants to see freight removed from residential streets and onto rail and coastal shipping.

- 1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors? Yes

The Board does not wish to see further urban sprawl and supports residential intensification in areas with the capacity.

The implication of the plan, in terms of residential development, is that further intensification close to the coast or in areas particularly prone to inundation should not continue. The Board supports this.

The Board is in favour of intensification where the land is suitable and where the infrastructure is or can be provided at reasonable cost, but within the blue areas (Map 7) there should be none.

Intensification also shouldn't occur within any of the areas with vacuum sewer – per the Council's submissions on PC14 regarding the Aranui, Prestons, and Shirley catchments.

The Board also supports better controls on the residential-industrial interface, ensuring that industrial activities do not unreasonably impinge on the quiet enjoyment of people's homes. We have numerous examples of this in our ward area, notably in Bromley and Woolston.

- 1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

It is good the Ihutai is included as a Ngā Tūranga Tūpuna, an area with concentrations of culturally significant sites.

We wish to ensure that people in East Christchurch have equitable access to greenspace and natural beauty, including the pockets of native biodiversity that still exist.

- 1.4 Do you support the concept of greenbelt around urban areas?

Yes

Why:

The Community Board supports the development of greenspace in every part of Greater Christchurch, especially in areas which are underserved, and the limiting of development in ecologically sensitive locations. Greater Christchurch should limit its sprawl and incorporate greenspaces of various sizes.

The Board also believes it is important to prevent landbanking on the urban fringe (to realise Opportunity 4) and is concerned about potential perverse incentives in the residential property market.

- 1.5 Do you agree with the approach to focus on these areas?

Unsure

"Eastern Christchurch has also been identified as a Priority Area, rather than a Priority Development Area, to recognise the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience."

For this to be more than just words, local, regional, and central government need to follow through and provide significant support for us to cope with existing and future challenges.

The plan is unclear what "resilience" means. Residents of East Christchurch fear being abandoned to deal with challenges current and future. We cannot face those challenges without substantial support.

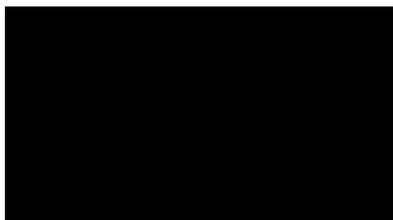
Areas prone to coastal inundation and the effects of sea level rise should be considered as part of the Coastal Hazards Adaptation Programme, but the plan does not specify how it will be incorporated.

1.6 Do you agree with the draft spatial strategy outlined above?

In general, the Board supports the Spatial Plan but wants to ensure that the East is part of the future of Christchurch, as we all adapt to the challenges of climate change together.

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

The Board may have more to add in our oral submission.



Paul McMahon
Chairperson, Submissions Committee
WAITAI COASTAL-BURWOOD-LINWOOD COMMUNITY BOARD

18 August 2023

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: John **Last name:** Laugesen

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
GCSP Submission - John Laugesen



Draft Greater Christchurch Spatial Plan Submission form



Over the past 15 years, Christchurch and its surrounding towns have grown rapidly. By 2050, more than 700,000 people are projected to be living in Greater Christchurch – 30% more than there are today. The population could potentially double to 1 million people within the next 60 years, if not earlier.

Collective effort is required to increase resilience to natural hazards and climate change, improve access to employment, education and housing, reduce carbon emissions, and create a sustainable and prosperous future.

In our recent Huihui Mai engagement we asked residents how they thought we should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability.

Of the more than 7,000 people who responded to the online survey:

86%

agreed with the direction to focus growth around key urban and town centres and along public transport routes

56%

of people are open to higher density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people.

68%

identified improving the health of waterways as a top priority

53%

of people agree with the proposed MRT route and 24% disagree. Agreement is much higher in suburbs along the MRT route (72%).

This information has informed the draft Greater Christchurch Spatial Plan, which is open for public submissions until **23 July 2023**. Even if you were not part of the earlier Huihui Mai engagement – your feedback on the draft plan is still important. We want to know if we got it right.

Making a submission

Fill out the online submission form
or send us an email

www.greaterchristchurch.org.nz
huihui@mail@greaterchristchurch.org.nz

Deliver* this form to:

Christchurch City Council Te Hononga Civic Offices, 53 Hereford Street, Christchurch

Selwyn District Council Offices, 2 Norman Kirk Drive, Rolleston

Waimakariri District Council Offices, 215 High Street, Rangiora

Environment Canterbury, 200 Tuam Street, Christchurch

Post* this form to:

Greater Christchurch Spatial Plan Consultation, Greater Christchurch Partnership, PO Box 73014, Christchurch 8154

*Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearing panel

If you make a submission, you can also speak to the Hearings Panel in support of your submission. Hearings on the draft Greater Christchurch Spatial Plan are scheduled to be held in October 2023.

Please note: We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However if requested, we will make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email huihui@mail@greaterchristchurch.org.nz.

Webinar

We're holding a webinar on Tuesday 27 June between 12 - 1pm to talk about the plan and to answer any questions you might have. You can register for the webinar online at www.greaterchristchurch.org.nz

Once you register for the webinar you will have the opportunity to send in your questions either before, or during, and we will answer as many as we can. The webinars will be recorded and uploaded to this page so you can watch at another time if you are unable to attend.

Contact the team

If you'd like us to attend your community meeting or event. If you have any questions for the team please

email us: huihui@mail@greaterchristchurch.org.nz

Next steps

Late July – September Submissions are collated and a report is produced for the Hearings Panel

October & November Hearings and Deliberations

Whakawhanake Kāinga Komiti considers endorsement and recommendation to partners of the Hearings Panel Recommendations Report

Early 2023 Partners consider adoption of the Greater Christchurch Spatial Plan



Your details

First name

John

Last name

Laugesen

Preferred method of contact: Email/Phone



Postal Address

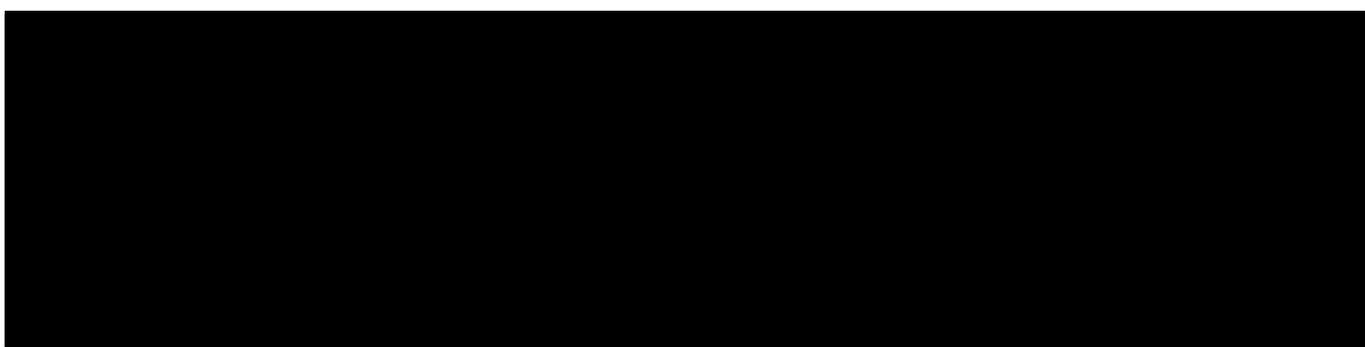
Suburb

City

Postcode

Email

Daytime Phone



If you're responding on behalf of an organisation, please provide

Organisation name

Your role

Number of people your organisation represents

Would you like to speak to the Hearings Panel about your submission? Your submission will be fully considered, regardless of whether you speak to the Panel.

Yes No

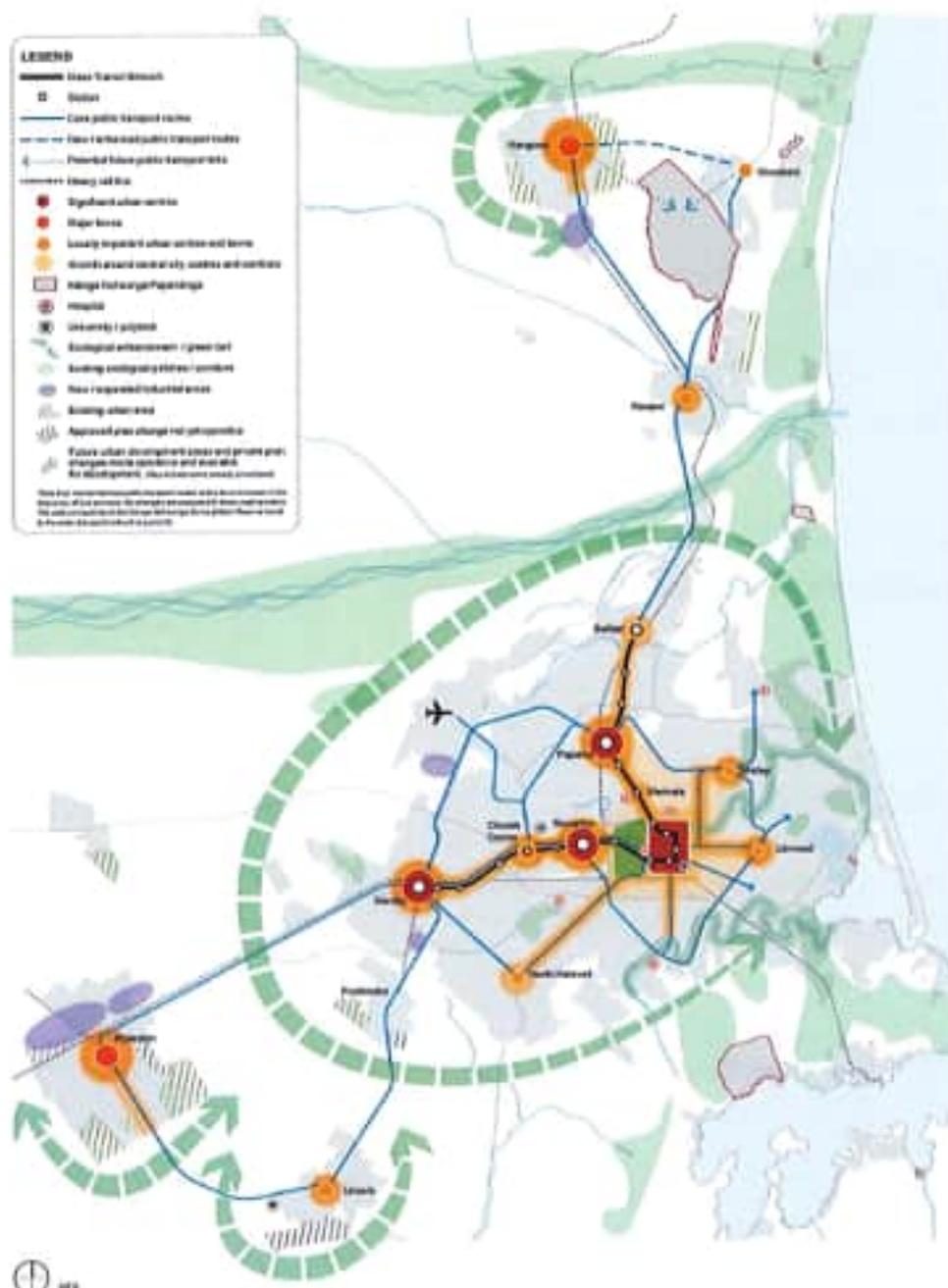
If yes, please ensure you have provided a daytime phone number in the details section so we can arrange a speaking time with you.



Questions

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The Greater Christchurch spatial strategy (1 million people)





Q1 The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions. Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes No Unsure

Why?

It would mean demolishing perfectly good buildings including possible heritage buildings

Q2 Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing. Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes No Unsure

Why?

It would drive people who can't afford owning their own home into multi-storey apartment buildings. attract crimes

Q3a The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes No Unsure

Why?

We already have substantial good quality parks and reserves. We don't need to overpopulate new smaller areas.



Q3b One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation. Do you support the concept of a Greenbelt around our urban areas?

Yes No Unsure

Why?

Absolutely
 My concern is that in time it may get compromised with possible further building/housing development by the sign of a pen within

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

gough or local govt require marks

- a Offer opportunities for accelerated and/or significant development
- b Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- c Are in key locations where successful development gives effect to the draft Spatial Plan.

Q4 The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes No Partially

Why (please specify the Priority Area)

Rolleston - already a new development with good consultation and planning. - doesn't need to have priority development
Rangiora - Community involvement would be sufficient to maintain maintenance



The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

Opportunities	Directions	Key Moves
 <p>40 Protect, restore and enhance Māori, heritage and other land assets of significance to Māori, and provide for sensitive spiritual and cultural connections to these places</p>	<p>20 Avoid urban development on: high-risk areas</p> <p>21 Protect, restore and enhance Māori, heritage and other land assets of significance to Māori, and provide for sensitive spiritual and cultural connections to these places</p> <p>22 Strengthen the resilience of communities and ecosystems to climate change and natural hazards</p>	<p>The prosperous development of heritage landscapes</p>
 <p>41 Restore and enhance the natural environment, with particular focus on water, the environment of biodiversity, the connectivity between natural areas and accessibility for people</p>	<p>30 Avoid development in areas with significant natural values</p> <p>31 Protect the health and wellbeing of our natural network of green spaces</p> <p>32 Create highly productive land for food production</p> <p>33 Support the opportunity of a green belt around urban areas</p>	<p>A strengthened network of urban and town centres</p>
 <p>42 Provide diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's employment needs</p>	<p>40 Enable the most cost-effective mix of housing options in urban areas, supported by infrastructure and transport accessibility to transport networks and services, along with the development of transport hubs within urban areas</p> <p>41 Encourage a mix of housing types and provide a range of housing options in urban areas</p> <p>42 Support a mix of housing types and provide a range of housing options in urban areas</p> <p>43 Support and encourage the development of housing in areas that support the desired pattern of growth</p> <p>44 Provide housing options of affordability</p> <p>45 Deliver housing neighbourhoods with quality developers and supporting community infrastructure</p>	<p>A more varied housing system</p>
 <p>43 Provide diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's employment needs</p>	<p>40 Enable the most cost-effective mix of housing options in urban areas, supported by infrastructure and transport accessibility to transport networks and services, along with the development of transport hubs within urban areas</p> <p>41 Encourage a mix of housing types and provide a range of housing options in urban areas</p> <p>42 Support a mix of housing types and provide a range of housing options in urban areas</p> <p>43 Support and encourage the development of housing in areas that support the desired pattern of growth</p> <p>44 Provide housing options of affordability</p> <p>45 Deliver housing neighbourhoods with quality developers and supporting community infrastructure</p>	<p>A collective focus on unlocking the potential of Public Areas</p>
 <p>44 Provide space for businesses and the economy to prosper in a low carbon future</p>	<p>50 Support a mix of housing types and provide a range of housing options in urban areas</p> <p>51 Encourage a mix of housing types and provide a range of housing options in urban areas</p> <p>52 Support and encourage the development of housing in areas that support the desired pattern of growth</p> <p>53 Provide housing options of affordability</p> <p>54 Deliver housing neighbourhoods with quality developers and supporting community infrastructure</p>	<p>An enhanced and expanded blue-green network</p>
 <p>45 Prioritise sustainable transport options to move people and goods in a way that supports thriving communities and provides for people's employment needs</p>	<p>60 Enable safe, effective and well-supported transport options for walking, cycling and other modes of transport</p> <p>61 Significantly improve public transport services between urban areas and provide a range of housing options in urban areas</p> <p>62 Improve accessibility to public transport to support longer journeys</p> <p>63 Develop innovative measures to encourage people to change their travel behaviour</p> <p>64 Support and encourage the development of housing in areas that support the desired pattern of growth</p> <p>65 Provide housing options of affordability</p> <p>66 Deliver housing neighbourhoods with quality developers and supporting community infrastructure</p>	<p>An enhanced and expanded blue-green network</p>

Q5 Do you agree with the draft spatial strategy outlined above?

Yes No Partially Unsure

It would be helpful to understand which aspects you support or do not support and why:

Our infrastructure is already very suitable.
No need to overhaul in a major way.
Transportation could be addressed with more consultation with ~~the~~ community groups and meetings.

Q6 Do you have any feedback on other aspects of the draft Spatial Plan?



Whakawhānake
Kāinga Komiti
Urban Growth Partnership
for Greater Christchurch



greaterchristchurch.org.nz
Greater Christchurch Partnership
PO Box 73014, Christchurch 8154

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Anthea **Last name:** Laugesen

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
GCSP Submission - Anthea Laugesen



**Whakawhanake
Kāinga Komiti**
Urban Growth Partnership
for Greater Christchurch



Huihui Mai
Let's come together

Draft Greater Christchurch Spatial Plan Submission form



Over the past 15 years, Christchurch and its surrounding towns have grown rapidly. By 2050, more than 700,000 people are projected to be living in Greater Christchurch - 30% more than there are today. The population could potentially double to 1 million people within the next 60 years, if not earlier.

Collective effort is required to increase resilience to natural hazards and climate change, improve access to employment, education and housing, reduce carbon emissions, and create a sustainable and prosperous future.

In our recent Huihui Mai engagement we asked residents how they thought we should tackle important issues - such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability.

Of the more than 7,000 people who responded to the online survey:

86%

agreed with the direction to focus growth around key urban and town centres and along public transport routes

56%

of people are open to higher density living, but it needs to be planned and designed to meet their different needs and provide quality of life for people.

68%

Identified improving the health of waterways as a top priority

53%

of people agree with the proposed MRT route and 24% disagree. Agreement is much higher in suburbs along the MRT route (72%).

This information has informed the draft Greater Christchurch Spatial Plan, which is open for public submissions until **23 July 2023**. Even if you were not part of the earlier Huihui Mai engagement - your feedback on the draft plan is still important. We want to know if we got it right.

Making a submission

Fill out the online submission form
or send us an email

www.greaterchristchurch.org.nz
huihui@greaterchristchurch.org.nz

Deliver* this form to:

Christchurch City Council Te Hononga Civic Offices, 53 Hereford Street, Christchurch

Selwyn District Council Offices, 2 Norman Kirk Drive, Rolleston

Waimakariri District Council Offices, 215 High Street, Rangiora

Environment Canterbury, 200 Tuam Street, Christchurch

Post* this form to:

Greater Christchurch Spatial Plan Consultation, Greater Christchurch Partnership, PO Box 73014, Christchurch 8154

*Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearing panel

If you make a submission, you can also speak to the Hearings Panel in support of your submission. Hearings on the draft Greater Christchurch Spatial Plan are scheduled to be held in October 2023.

Please note: We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However if requested, we will make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email huihui@greaterchristchurch.org.nz.

Webinar

We're holding a webinar on Tuesday 27 June between 12 - 1pm to talk about the plan and to answer any questions you might have. You can register for the webinar online at www.greaterchristchurch.org.nz

Once you register for the webinar you will have the opportunity to send in your questions either before, or during, and we will answer as many as we can. The webinars will be recorded and uploaded to this page so you can watch at another time if you are unable to attend.

Contact the team

If you'd like us to attend your community meeting or event, if you have any questions for the team please

email us: huihui@greaterchristchurch.org.nz

Next steps

Late July - September Submissions are collated and a report is produced for the Hearings Panel

October & November Hearings and Deliberations

Whakawhanake Kāinga Komiti considers endorsement and recommendation to partners of the Hearings Panel Recommendations Report

Early 2023 Partners consider adoption of the Greater Christchurch Spatial Plan



Your details

First name

Anthea

Last name

Lourensen

If you're responding on behalf of an organisation, please provide

Organisation name

Your role

Number of people your organisation represents

Would you like to speak to the Hearings Panel about your submission? Your submission will be fully considered, regardless of whether you speak to the Panel.

Yes No

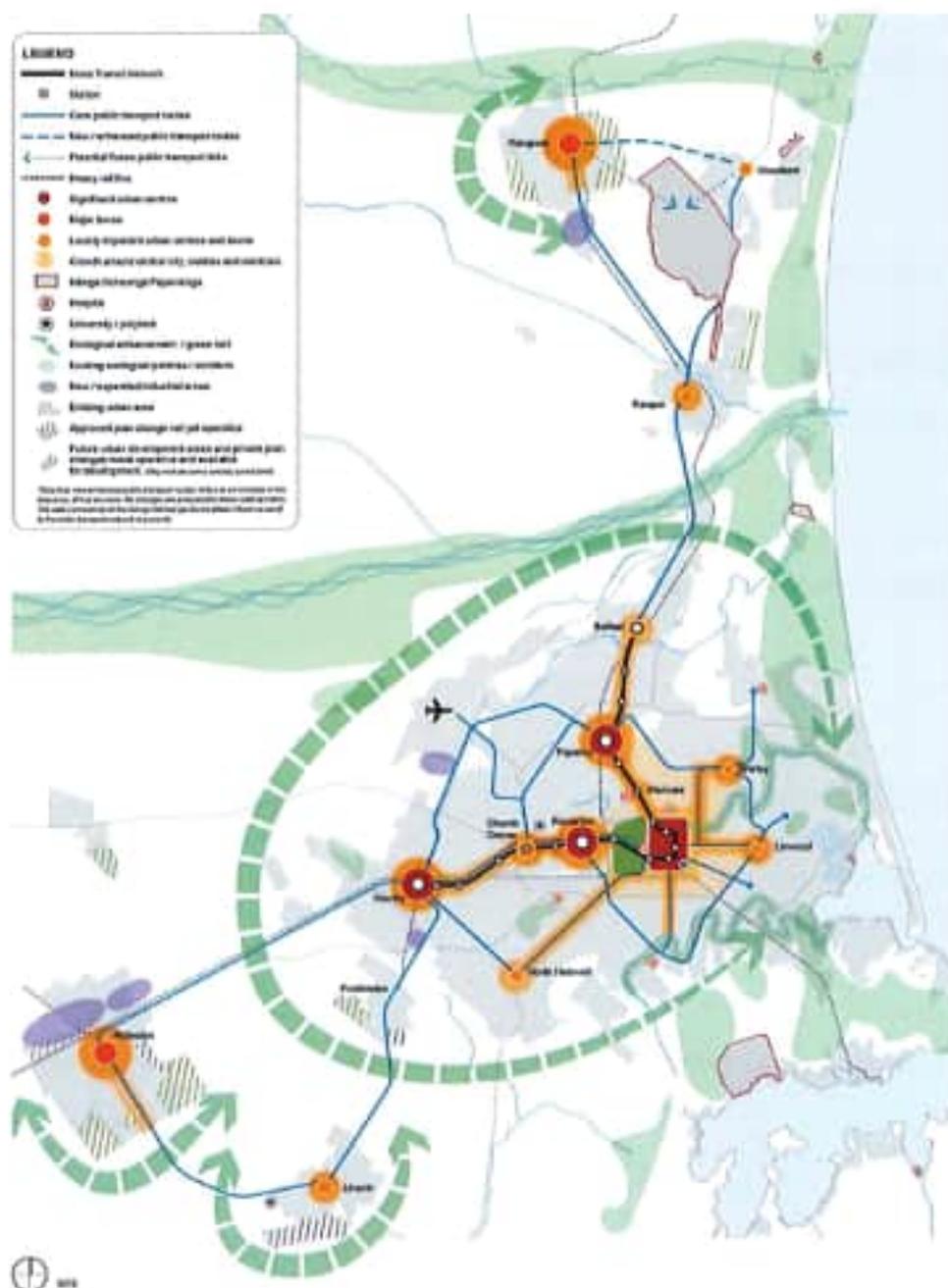
If yes, please ensure you have provided a daytime phone number in the details section so we can arrange a speaking time with you.



Questions

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The Greater Christchurch spatial strategy (1 million people)





Q1 The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions. Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes No Unsure

Why? *Having a car is more convenient. Needing to get to places that are not on the routes of public transport.*

Q2 Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing. Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes No Unsure

Why? *I don't see enough green space for the children & no parking.*

Q3a The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network. Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes No Unsure

Why? *The proposed strategy will not work.*



Q3b One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation. Do you support the concept of a Greenbelt around our urban areas?

Yes No Unsure

Why? *But do not agree to high intensity building, no compromising a freedom of choice.*

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- a Offer opportunities for accelerated and/or significant development
- b Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- c Are in key locations where successful development gives effect to the draft Spatial Plan.

Q4 The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Yes



Partially

Why (please specify the Priority Area)

Q5 Do you agree with the draft spatial strategy outlined above?

Yes No Partially Unsure

It would be helpful to understand which aspects you support or do not support and why.

This is going to cost more than N.Z can afford.

Having travelled a lot overseas I have seen the proposal and several years dead. It does nothing for the well being of the people living in these areas.

Q6 Do you have any feedback on other aspects of the draft Spatial Plan?

Having public transport does not work for very many people outside of working places.

Needing parking to visit friends & family is necessary.

Not easy for elderly, disabled people to get to & from places they need to go.



Whakawhanake
Kōwhiri Kōwhiri
Urban Growth Partnership
for Greater Christchurch



greaterchristchurch.org.nz

Greater Christchurch Partnership
PO Box 73014, Christchurch 8154

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 01/08/2023

First name: Ross **Last name:** Houliston

If you are responding on behalf of a recognised organisation, please provide the organisation name:

The Greater Hornby Residents Association

Your role in the organisation and the number of people your organisation represents:

The Greater Hornby Residents Association

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
The Greater Hornby Residents Association - The Greater Christchurch Spatial Plan



The Greater Christchurch Spatial Plan. July 2023.

The largest problems we face are Climate Change and the Alpine Fault. The first we only just starting to accept, in spite of it being around for some years, while the second, with keeping our heads in the sand and hoping it will go away, is not going to see it go away.

On the first matter, why are we still issuing building consents for future flood prone areas, such as near the coast and swampy zones within this city. It has been recognized for some years now Climate Change is going to happen, and it will affect these flood prone areas. Ratepayers should not have to pick up the pieces after the fact, and it is now time to stop issuing permits in these zones. Coastal Land has been recognised as being very vulnerable right around New Zealand and is already being affected around Te Wae Wae bay and

Colac Bay in Southland as well as above Westport on the Coast.

The Alpine Fault has been on the horizon for some decades now. I attended the talk at the Halswell Library earlier in the year, and frankly could not believe how much the concern has been downscaled since the 1990's. Then the Hurunui News were reporting that there would be a major shake which could see land east of the northern motorway disappear below sea level. Now it will be a moderate shake that will not produce as much liquefaction as the 2011 Christchurch Earthquake. This speech was based on the Alpine Fault happening near Milford Sound, while it is a well known fact that it could happen anywhere on the Fault Line, and one prime location is as close as Lake Kaniere. This could well see a much bigger shake and liquefaction than that of Milford. A little known fact is that plans were drawn up for a hydro electric dam on the Waimakariri River, near Springfield, in the 1920's to supply an electric power supply for Christchurch. This idea was very short lived as it was soon recognised that it would be full of shingle within 5 years. Refer to 2.1 and 2.2 on directions under the Spatial Plan. Very questionable on how safe we are from the river! With

this river bed now as high in many places as the surrounding land, we could well be looking at mass destruction, due to the river reverting to flow out to the south of Banks Peninsula, unless we start quarrying the river bed instead of designing the moat system which is appearing in the north-west of Christchurch. The technology is available to do this in a sustained manner, and it will remove the cancerous dust away from the residential housing creating the respiratory diseases currently being experienced. GNS Science has a recommended distance of 2-7 km from residences, and it is also recognised in American Medical Journals and by the W.H.O. that quarry dust carrying RCS dust is extremely bad for health.

We agree that housing density has to increase, but question how you are going to do this, when the infrastructure is already failing in many locations. Perhaps it may be best to limit these builds to follow behind new infrastructure as it is put in place.

We note that 1.1 says to avoid urban development over Wahi Tapu. Why then are quarry development's happening on land on which housing could be placed. It must be remembered that once quarried that land is useless for anything else, and ratepayers should not be

expected to pick up this useless land as has happened in the past.

Transport is a tricky subject with the past failure of those in charge to place all transport into one central hub. This could and should have been done after the earthquake on the old railway station site with rail; bus and tram services all operating from the same site.

We are totally opposed to the Rapid Transport System that has been proposed. We note that once again the public has not been told of any details surrounding this or how it can be facilitated. We are not Mushrooms to be kept in the dark while being fed proverbial B.S. We see this as a means of shifting your traffic out of the inner city to our suburb, while adding to congesting the traffic in our suburb. There is nowhere for additional car parking in Hornby, and to increase it, along with the increased housing density, will only make our facilities, which are already stretched to the limit, inaccessible, and this will mean residents will then have to shop elsewhere, perhaps even at Prebbleton, Lincoln or Rolleston. This will simply mean more travel, and an increase on the carbon footprint.

The solution is to utilise the current rail tracks, electrify them from Rolleston to Rangiora and through to Lyttleton, with inner city bus links.

The current system involving quarry dust is seeing us receiving complaints about increased dust levels from quarry activity in Pound Rd. to as far away as Hei-Hei Rd., which is over 3km from Fulton Hogans crushing system at Pound Rd. We note that the Aggregate Association is recommending a 500m setback, equal to Australia's lowest setting. Residual Crystalline Silica dust content in NZ is far higher than Australia, and we understand The University of Canterbury has traced this dust as far as 10km from the site of origin. Even India and China have much stricter setback levels. In Europe crushing equipment must be enclosed to stop the spread of this cancerous dust. As mentioned above GNS Science recommends 7km as best practice for setbacks between residences and quarries. Quarry trucks and Demolition trucks should all be covered when travelling around the city. Why are we not taking these issues seriously here in Christchurch, and continuing to potentially harm our residents health and wellbeing.

Ross Houliston,

Research / Submissions Officer,
The Greater Hornby Residents Association.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 01/08/2023

First name: Quentin **Last name:** McDonald

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Ōpāwaho Heathcote River Network

Your role in the organisation and the number of people your organisation represents:

Chair

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
OHRN Submission to GCSP

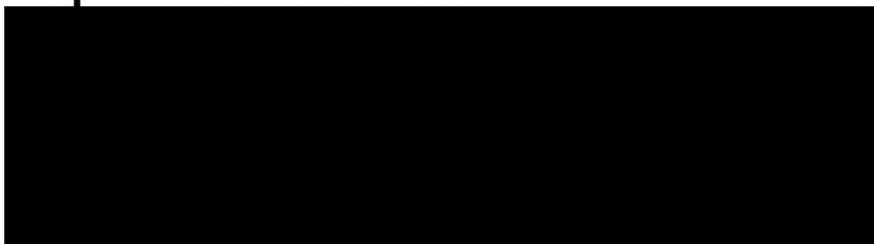
Submission on the

Draft Greater Christchurch Spatial Plan



July, 2023

Ōpāwaho Heathcote River Network Inc.



Thank you for the opportunity to make a submission on the Draft Greater Christchurch Spatial Plan.

The Ōpāwaho Heathcote River Network – Who are we?

The Ōpāwaho Heathcote River Network (OHRN) is a community-based catchment group that cares deeply about the health and mauri of the river; about connecting the community around the river and about advocating for the river. We facilitate and support the values, efforts and needs of our local river care organizations and communities along the river.

We have become a voice for the river and a recognised player in the community-led delivery of collaborative actions to support the work carried out by both ECan and the CCC to improve the health of the river and to strengthen the community connection to the river.

Our Vision is:

An ecologically healthy river that people take pride in, care for and enjoy.

Our Purpose is:

We are a voice for the Ōpāwaho Heathcote River, advocating on its behalf to:

- **promote the regeneration of the health and mauri of the awa, and**
- **connect with and support communities within the river catchment.**

Submission

Our submission is divided into two sections:

- Matters which relate to the catchment of the Ōpāwaho Heathcote River
- General comments about the draft Spatial Plan

Matters which relate to the catchment of the Ōpāwaho Heathcote River

1. The spatial strategy (p28 - 31)

- i. We support the broad strategy of the plan to close the gap between the current and desired future states for Greater Christchurch.
- ii. The six opportunities for closing this gap appears to cover the full range of possibilities. However, the draft plan appears to rank all six opportunities equally.
- iii. While we understand that these opportunities are inter-related, we believe that there is an important internal hierarchy within these six opportunities which needs to be made obvious in the Plan.
- iv. We submit that *Part 1 - Areas to protect, avoid and enhance* (Opportunities 1 to 3) should be considered **primary** opportunities that are preconditional to the **secondary** *Part 2 - An urban form for people and business* (Opportunities 4 to 6). That is, that in taking up any of the

Opportunities 4 to 6, the matters in Opportunities 1 to 3 MUST be addressed appropriately and to the greatest extent possible.

- v. For example, in fulfilling *Opportunity 5.1 Sufficient land is provided for commercial and industrial development uses well integrated with transport links and the centres network* developments MUST also fulfil Opportunities 1 to 3 including *Opportunity 3.2 Prioritise the health and wellbeing of water bodies*.
- vi. Too often in the past and currently, prioritising the health and wellbeing of water bodies (as well as all the other Opportunities in 1 to 3) has been fobbed off in planning outcomes to the rather haphazard result of mitigation of development effects on the environment. This Spatial Plan must emphasise the primacy of the first three opportunities...
 - i. Protect, restore and enhance historic heritage and sites and areas of significance to Māori etc
 - ii. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change
 - iii. Protect, restore and enhance the natural environment etc

...over the other three opportunities.
- vii. We submit that within *Part 1 - Areas to protect, avoid and enhance*, Opportunites 1 - 3 could be better ordered to indicate the primacy of the environment by changing the order to ...
 - i. Protect, restore and enhance the natural environment , with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people
 - ii. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places
 - iii. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change

2. Map 8: Areas subject to negotiable natural hazard risks (p 59)

- i. We submit that this map is missing an important natural hazard in not having a layer for “High Soil Erosion Risk” or similar. This is not the same as “Slope Hazard”.
- ii. Erosion of loess soils from the Port Hills is the greatest current contaminant of the Ōpāwaho Heathcote River.
- iii. Controlling, preventing or minimising developments on the Port Hills must be an essential part of any plan to reduce the level of erosion.

3. An enhanced and expanded blue-green network Blue/Green network (p45):

- i. We very strongly support the concept of a blue-green network throughout the catchment.
- ii. While this section of the plan reads well, when it comes to establishment of such concepts within urban developments, these blue-green elements tend to be minimised in their extent and thereby compromised in their effectiveness. There must be strong and effective commitments by all partners in the Urban Growth Partnership to fully implement these blue-green networks.

- iii. We submit that partners in the Urban Growth Partnership should make commitments in this plan to use the plan's implementation to correct previous blue-green provision errors and to expand blue/green infrastructure opportunities in established areas of the catchment where this is possible.
- iv. While implementing a blue-green network in new development areas must be a priority, so must efforts be made to retrofit these networks in established areas. This may require partners to acquire land in order to affect retreat from the river, to give it and other waterbodies, including wetlands, appropriate space and to provide space for adequately proportioned blue-green network connections.
- v. We submit that this Spatial Plan should promote the concept of a "sponge city" through creating filtration wetlands along the base of seepage zones, streams, hills and valleys, with revegetation using native rushes, sedges, harakeke, toetoe and tikouka starting at the head of all streams.

4. **A strengthened network of urban and town centres: Hornby (p35)**

- i. We support the selection of Hornby as a Priority Development Area
- ii. In order for Hornby to become a "*...thriving neighbourhood with quality developments and supporting community infrastructure*" a vital masterplanning exercise will need to be completed that, well in advance of any developments.
- iii. This masterplanning of the Hornby area must seek to correct the planning errors that have led to this industrial area being a gross polluter of the Ōpāwaho Heathcote River.
- iv. The siting of this area at the headwaters of the Ōpāwaho Heathcote River makes it essential that planning as well as blue-green networks effectively eliminate the likelihood of stormwater from this expansion and redevelopment of Hornby continuing to pollute the Ōpāwaho Heathcote River.
- v. The reduction of stormwater pollution from Hornby should be listed among the purposes for this development on page 37 of the Spatial Plan.
- vi. We submit that the Spatial Plan should encourage the use of green roofs and "sponge" developments to reduce and filter stormwater from the Hornby area to reduce the effects of such a large development at the headwaters of the river.
- vii. Given the opportunity for corrective action in this regard, not only at Hornby but at other Priority Areas, Priority Areas deserve to be rated as "Major contribution to the opportunity" for Opportunities 2 and 3 at least in the Joint Work Programme (p90 - 91).

5. **Map 2: The greater Christchurch spatial strategy (1 million people) (p29)**

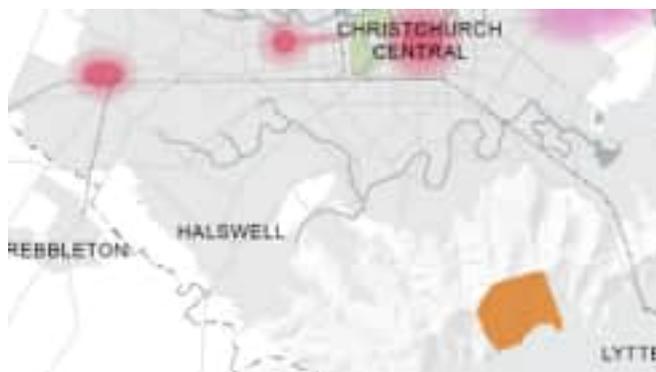
- i. Although we accept that this map is purely representational, the incorrect depiction of the Ōpāwaho Heathcote River is regrettable.
- ii. Similarly, Map 14: Broad locations of housing and business development capacity (700,000 people) depicts the Ōpāwaho Heathcote River incorrectly.
- iii. In every other map, even on the front cover of the Spatial Plan, the Ōpāwaho Heathcote River with some of its major tributary streams, is largely correct.

- iv. We request that Map 2 and Pap 14 are altered accordingly.

Incorrect depiction of river p29



Correct depiction of river p44



General comments about the draft Spatial Plan

6. Part 3 - Connecting people and place (p82 - 86)

- i. We strongly support Opportunity 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities
- ii. One of the items provided in the “Context” on page 83 recognises the need for “an urban form that supports people to take shorter trips to meet their daily needs and activities.” We strongly support this requirement.
- iii. We submit that the partners in the Urban Growth Partnership should emphasise in this Spatial Plan a commitment to improving connections between people, not just as a means of addressing the transport and emissions issues, but as vital requirements of a growing city to reduce alienation, isolation and loneliness.
- iv. We submit that this Spatial Plan should give greater emphasise to the need for growth planning to include creation of a sense of place, developing connections of people to each other, to nature and to waterbodies in particular.

7. 2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards (p56 - 57)

- i. We very strongly support “*promoting enhanced coastal and wetland reserves to reduce flood risk, establishing new green spaces to help absorb and treat rainwater, planting trees to shade and cool urban areas, and creating new or enhanced forested areas.*”
- ii. We submit that this section would be improved by including “increasing setbacks from waterbodies including wetlands” as another means of increasing resilience.

- iii. We submit that this section would be improved by listing “protection, conservation and recharge of groundwater” as another means of increasing climate change resilience.
- iv. We submit that this section would be further strengthened by indicating that early retreat from areas prone to flooding and sea-level rise would be the best option which would have the added advantage of allowing for further revegetation of indigenous species.

8. **Green belt concept** (p48)

- i. We submit that the concept of a Green Belt is not a useful organising or planning tool and is redundant in the face of better options.
- ii. We submit that a much stronger planning idea is the enhancement of natural features such as hills, catchments, rivers and wetlands. Where these natural features converge to form roughly contiguous areas, a natural “green space” forms and is self-enhancing if of sufficient scale and if sufficiently protected from development.
- iii. We submit that the issue is actually one of recognising and prioritising such blue-green spaces in growth planning and in statutory documents. This Spatial Plan has recognised the importance of blue-green spaces and their connections. The issue is how the partners in the Urban Growth Partnership reflect this importance in District Plans to prevent developers undermining the higher priority of blue-green spaces.
- iv. We submit that there should be greater emphasise in the plan on the importance of well-established integrated landscape design with patch/steppingstone, corridor and matrix configurations to maximise connectivity.
- v. We submit that this Spatial Plan should indicate that no further areas of the Port Hills should be developed for housing due to the impossibility of mitigating erosion arising from such development.

9. **5.3 Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy** (p80)

- i. We submit that the place of energy and digital technologies in a well-functioning modern society is too important to be left to the competitive vagaries of “strong partnerships with providers of energy and digital technologies”.
- ii. We submit that equity of access to energy and digital technologies now requires a guarantee of supply and access similar in importance to water.

10. **Mass Rapid Transit system** (p38 - 41)

- i. We strongly support the Mass Rapid Transit system described in this Spatial Plan
- ii. We recognize that construction of such a MRT system will be locally disruptive at the time of construction.
- iii. The more extensive the scale of the MRT and its patronage, the greater the beneficial impacts on the waterbodies located along the route through reduction of zinc and copper contaminants from cars.
- iv. We would support an even more extensive network extending an arc from Amberley to Springfield to Ashburton.

- v. We urge the partners of the Urban Growth Partnership for Greater Christchurch to advance the commencement of the construction of this MRT system immediately.

11. Decision-making in the face of difficult decisions

- i. The Spatial Plan makes it clear that there are difficult trade-offs and decisions to be made as Greater Christchurch moves into its future.
- ii. We submit that in order to achieve greater social cohesion and agreement about such contentious planning decisions, partners of the Urban Growth Partnership should explore more effective community engagement processes.
- iii. We submit that currently, planning decisions are dominated by industry and developers through their greater access to expert opinion and legal argument.
- iv. We submit that better, more community-supported and lasting decisions will be made by invoking processes that involve the community in more meaningful ways than are currently used.
- v. We submit that this Spatial Plan could encourage partners of the Urban Growth Partnership to explore or adopt the use of Citizen Assemblies.

12. Wetlands

- i. Throughout the Spatial Plan, the term 'waterbodies' is used to cover all types of geographical features containing water.
- ii. We submit that in doing so, the place of wetlands is left somewhat insecure.
- iii. We submit that to ensure that wetlands receive the same priority as other water features, the Spatial plan should refer to "waterbodies including wetlands" at every appropriate point that the term "waterbodies" is currently used.

Thank you for the opportunity to provide a submission on the Draft Greater Christchurch Spatial Plan.

We wish to be heard on this submission

Quentin McDonald

Chair

Ōpāwaho Heathcote River Network

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 01/08/2023

First name: Andrew **Last name:** Mactier

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Danne Mora Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

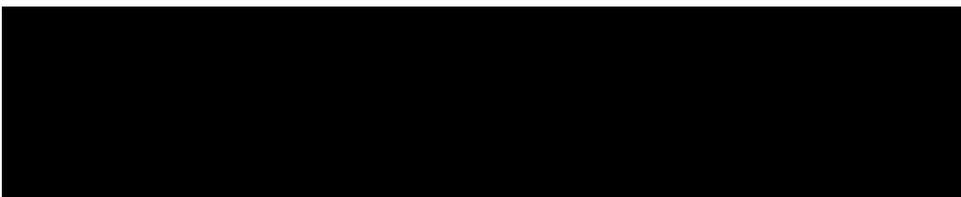
File
Danne Mora Ltd Submission on the Draft Greater Christchurch Spatial Plan

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: **Greater Christchurch Partnership**
huihuimai@greaterchristchurch.org.nz

1. Submitter Details

Submitters name: **Danne Mora Ltd**



2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan). We commend the Greater Christchurch Partnership in commencing the development of a Future Development Strategy for the Greater Christchurch area that provides a blueprint for how population and business growth will be accommodated in Greater Christchurch into the future.

Details of our submission on the Spatial Plan are set out below.

2.1 Do you support the improved public transport system proposed in the draft Spatial Plan?

✓ Partially

Reasons

We support the improvements to the public transport system in principle, but it is not clear that the delivery of the Mass Rapid Transit system (MRT) system as proposed is feasible nor affordable and have concerns that any focus on implementing the proposed MRT will come at the cost of not delivering on an improved wider public transport system for the Greater Christchurch area.

The Spatial Plan has a very strong emphasis on a MRT system. Focusing on the proposed MRT should not come at the cost of improving the existing public transport system, particularly the public transport system which does not meet the current needs of the community.

While we recognise that Opportunity 6 of the Spatial Plan seeks to 'prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities' it is not clear how or when this will be achieved. Delivery of a satisfactory public transport system that meets the current needs of the community in the Greater Christchurch area has been a perennial issue for those agencies responsible for delivering the public transport system. Much of the Spatial Plan's direction is predicated on

increased residential densities to provide a critical mass to support public transport. Aside from MRT, there is little clarity on how public transport services will align with greater housing density.

The current public transport system does not adequately serve existing urban areas with a service that meets the needs of the community and there do not appear to be any plans to improve, or even provide public transport into recently developed urban areas, areas which are currently being considered for rezoning for urban expansion in parts of Greater Christchurch, or to service areas which are signalled for further intensification through the Spatial Plan and subsequent processes.

Given the above it is difficult to be confident that the transformational shift in transport choice, from private motor vehicle to public transport, as articulated and envisioned by the Spatial Plan is achievable and that the anticipated reduction in carbon emissions will transpire as intended.

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

✓ Partially

Reasons

In principle there may be sound rationale to focus development and investment around urban centres and along transport corridors. However, we have concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these areas and making this a focus of the Spatial Plan.

Encouraging and providing for future development should not be limited to areas around the “significant urban centres” and “core public transport routes” shown on Map 2. A broader approach for future development throughout Greater Christchurch is required for the reasons addressed below.

Firstly, due to the large number of additional dwellings and associated services that will be required over the next 30 years and beyond it is important to enable denser development throughout Greater Christchurch and not just focusing on Christchurch City, subject to avoiding land which has important values or is subject to limitations such as natural hazards.

Secondly, it is not critical that people live near “significant urban centres”. These centres are places that most people go to occasionally rather than on a regular basis. The most frequent shopping is at a supermarket which is often done as part of trip to work or home and some other destination. Therefore there is no logistical reason to only encourage and provide for higher densities in these areas.

Thirdly there are real concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these ‘brownfield’ areas and making this a focus of the Spatial Plan. While intensification of ‘brownfield’ sites and areas may be philosophically appealing, the feasibility of achieving this is unlikely to be possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners reluctance to sell, or sell at reasonable market rates

- Miscalculating infill capacity by failing to properly account for the size, shape, value, access, and location of existing dwellings, utilities and other improvements.
- High cost of redeveloping sites which have existing buildings, utilities and other improvements on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

Additional areas of concern with the proposed approach include:

- Cost efficiency and effectiveness – providing infrastructure and utilities to service the level of intensification anticipated.
- Detrimental effects on amenity effects for those areas subject to infill and intensification, and associated adverse effects on people’s well-being and lifestyle, especially in cases where intensification is carried out in an ad-hoc and piecemeal way, as seems most likely.
- The Spatial Plan does not show future growth areas beyond the 2050 timeframe (see Map 2) and relies solely on infill and development of greenfield areas currently being considered by Council plan changes and District plan reviews. This implies that all future growth to accommodate an extra 300,000 population beyond the 2050 population of 700,000 will be through intensification into existing urban areas. This is at odds with Policy 1 of the NPS-UD which require that:

Planning decisions contribute to well-functioning urban environment, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

The Spatial Plan is also at odds with Central Government’s Urban Growth Agenda which is “to improve housing affordability by removing barriers to the supply of land and infrastructure and making room for cities to grow up as well as out.” This agenda clearly anticipates providing for growth both out and up, whereas the Spatial Plan predominantly provides only for upward development, especially beyond 2050. Greenfield development is largely ignored in the Spatial Plan despite its proven role in providing for housing within Greater Christchurch. The high number of new houses achieved in recent years by way of greenfield development has occurred for a number of reasons, the most significant of which is that large blocks of land are only available outside existing urban areas. These blocks can and have enabled a large number of new sections and houses to be efficiently created in a relatively short time frame. This has resulted in a variety of housing options being available in well-designed, accessible developments.

Additionally, caution must be applied to the notion that greenfield development is the antithesis of intensification and is therefore not a preferred source of housing supply. Greenfield development can deliver higher housing densities which typically create more optimal outcomes than brownfield intensification. The ability of greenfield development to masterplan and deliver density which includes amenity such as greenspace and community space along with provision for public transport services and sustainable and efficient infrastructure far surpasses the ability for similar outcomes to be achieved in brownfield setting.

The draft Natural and Built Environment Bill, and associated draft Spatial Planning Bill reinforces and builds on the Urban Growth Agenda's requirement to provide for housing choice, as set out in Clause 5 – System outcomes, of the NBE Bill:

To assist in achieving the purpose of this Act, the national planning framework and all plans must provide for the following system outcomes:

(a) ...

(b) ...

(c) well functioning urban and rural areas that are responsive to the diverse and changing needs of people and communities in a way that promotes—

(i) the use and development of land for a variety of activities, including for housing, business use, and primary production; and

(ii) the ample supply of land for development, to avoid inflated urban land prices; and

(ii) housing choice and affordability; and

(ii) an adaptable and resilient urban form with good accessibility for people and communities to social, economic, and cultural opportunities; and

(d) ...

(e) ...

Clause 3 of the Spatial Planning Bill sets out that Regional Spatial Strategies are to assist in achieving the system outcomes established in the NBE Bill.

A Spatial Plan that emphasises infill without regard to other housing types, and making provision for an ample supply of land would appear to be at odds with the direction of the urban growth agenda, and risks inflating urban land prices and limiting housing choice for the community.

2.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

✓ Yes

Reasons

A healthy natural environment is intrinsically linked with the wellbeing of people and places. It is important to work with nature when considering development for the future, especially in a time of increased risk from the effects of climate change induced weather events and potential sea level rise. Any proposal to protect, maintain and enhance the natural environment in urban areas needs to be based on sound evidence and on a case-by-case basis.

2.4 Do you support the concept of a Greenbelt around our urban areas?

✓ Unsure

Reasons

It is not clear what the future use of land between the Green Belt and Existing urban area is intended to be. Whilst the concept of a Green Belt is not opposed in principle, there appears to be little thought put into its identification and application. Currently the Green Belt appears to capture critical areas of land that may be the most practical and efficient location for growth, particularly those areas of land between Prebbleton, Lincoln and Rolleston, but also to the west of Christchurch between West Melton and Templeton. In its current form the Green Belt potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan and has the potential to lead to perverse outcomes in terms of future urban growth and development. In addition, large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan.

A policy framework that achieves the same outcomes described by the draft Spatial Plan (an area where there is a dominance of open space for nature, rural production, and recreation. A green belt can be used to provide a large, connected area of natural environment spaces and to limit urban expansion.), but which does not rely on such a blunt instrument as a green belt, will achieve better outcomes and should be sufficient to:

- Provide for open space for nature and recreation

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

As there is uncertainty that a green belt will form part of the further planning approach for Greater Christchurch, and will be subject to further investigation in any case, it is our preference that no areas of potential green belt are identified on any maps in a final Spatial Plan.

2.5 Priority Development Areas: Do you agree with the approach to focus on these areas?

✓ Partially

Reasons

In principle we support the concept of Priority Development Areas (PDA) and look forward to working in partnership with the relevant Territorial Authorities and Government agencies to unlock opportunities in these areas.

However, it is unclear what the focus of the various PDAs is intended to be and in what sequence (i.e. which PDA has priority?), over what timeframes, which priority areas will be and if for more intensive residential development by way of infill, the extent to which this is feasible. As noted above, while intensification of existing urban areas may appear viable, the feasibility of achieving this is often not possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners' reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, utilities and other improvements.
- High cost of redeveloping sites which have existing buildings, utilities, and other improvements on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

2.6 The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. Do you agree with the draft spatial strategy outlined above?

✓Partially

Reasons

Opportunity	Direction	Support/Oppose
<p>1. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people’s physical and spiritual connection to these places</p>	<p>1.1 Avoid urban development over Wāhi Tapu</p> <p>1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and on regional and site-specific characteristics.</p>
<p>2. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change</p>	<p>2.1 Focus and incentivise growth in areas free from significant risks from natural hazards</p> <p>2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards</p>	<p>Support both Directions subject to any actions associated with these Directions being based on a sound evidential basis and site specific characteristics.</p> <p>We also consider that, based on the information provided in the Spatial Plan, that the estimation of risk from climate change is overly optimistic given the timeframe of the Spatial Plan. Managed retreat should be discussed in detail and provided for.</p>
<p>3. Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people</p>	<p>3.1 Avoid development in areas with significant natural values</p> <p>3.2 Prioritise the health and wellbeing of water bodies</p>	<p>Support Directions 3.1 and 3.2 subject to any actions associated with this Direction being based on a sound</p>

	<p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production.</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>evidential basis and on-site specific characteristics.</p> <p>Support in part. This is most realistically achieved in well designed greenfield areas. It is difficult to see that this can be achieved in brownfield development areas, which is likely to result in less than optimal social, cultural and environmental outcomes.</p> <p>Support, subject to any actions associated with this Direction being based on a sound evidential basis and on site specific characteristics.</p> <p>Oppose, for the reasons set out in Section 2.4</p>
<p>4. Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs</p>	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services.</p> <p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p>	<p>Support</p> <p>Support in part. Amend as follows: 'Ensure <u>at least</u> sufficient ...' to align with Central Governments Urban Growth Agenda</p>

	<p>4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>Support in part, for the reasons set out in Section 2.2 and section 2.5. In addition, it is not clear what incentives will be provided and how realistic this Direction will be in terms of implementation</p> <p>Support in part, for the reasons set out in Section 2.2</p> <p>Support in part. This direction seems unrealistic as it largely depends on economics and attitudes. In addition, it is not clear that thriving neighbourhoods with quality developments and supporting community infrastructure is realistic in brownfield intensification areas</p>
<p>5. Provide space for businesses and the economy to prosper in a low carbon future</p>	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network</p> <p>5.2 A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services</p>	<p>Support</p> <p>Oppose in part. It is not clear what this direction is seeking and whether this Direction is required.</p>

	<p>5.3 Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy</p>	<p>Support in part. The current Christchurch International Airport noise contours are out of date and need to be updated using the Annual Average Noise Contours recently developed, by CIAL, and peer reviewed by Environment Canterbury. The Spatial Plan needs to use the updated noise contours to inform future planning processes and decision making.</p>
<p>6. Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities</p>	<p>6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility</p> <p>6.2 Significantly improve public transport connections between key centres</p> <p>6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga</p> <p>6.4 Develop innovative measures to encourage people to change their travel behaviours</p> <p>6.5 Maintain and protect connected freight network</p>	<p>Support</p> <p>Support, for the reasons set out in Section 2.1</p> <p>Support</p> <p>Support</p> <p>Support</p>

And for the reasons set out in Sections 2.1 – 2.5, and in Section 2.7

2.7 Do you have any feedback on other aspects of the Draft Spatial Plan

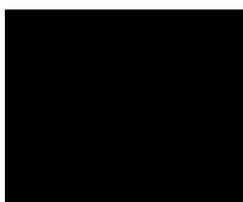
The Spatial Plan recognises that it will be necessary to incentivise higher density residential living. The previous and now current Christchurch District Plan have provided for higher densities. While there had been some demand for this housing typology, recent experience indicates that demand is now tailing off. This indicates that unless there are significant incentives that the desired increase in density will not occur. It is not sufficient to enable this development. This is recognised in Direction 4.3 but no examples of this critical component for densification are provided or discussed.

We agree that focusing growth away from hazardous locations and investing in infrastructure that reduces exposure and adapting urban areas by incorporating functional elements into the blue-green network can all help to reduce some of the risks. However, we note there does not appear to be any discussion or initiatives that considers managed retreat of existing development that is vulnerable with the next 30 years.

Further clarity on implementation and delivery of the Spatial Plan is required. As currently drafted the implementation and delivery is vague and uncertain and it is not clear how each supporting agency will be involved and who is providing leadership on various initiatives, and where there is a coordinating agency in charge of implementation. It is equally uncertain how the development community will be able to take advantage of opportunities to partner with territorial authorities, the Greater Christchurch Partnership and Government Agencies on relevant initiatives.

3. Hearing options

We confirm that we do wish to be heard in support of our submission.



23 July 2023

Signature of person authorised to sign on behalf of submitter

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 01/08/2023

First name: David **Last name:** Duffy

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Richmond Residents' and Business Association

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Richmond Residents and Business Association-Greater ChCh Spatial Plan



RICHMOND RESIDENTS' and BUSINESS ASSOCIATION

SUBMISSION

GREATER CHRISTCHURCH SPATIAL PLAN

In this submission we have specifically targeted areas which need consideration within the scope of the greater Christchurch spatial plan as they could be viewed through the lens of the residents and general community of Richmond, an inner city suburb.

Richmond is one of Christchurch's oldest suburbs dating back to the early 1900's. It has a complex population of socio-economic and ethnic groups, of modern and heritage type buildings, of various amenities and ethnic groups, and a high number of social housing complexes. It enjoys the existence of a number of voluntary organisations who, between them, are assisting the community and the city to address many of the needs surrounding the social climate, the physical environment and the natural environment. There is a strong sense of community existing in a suburb where many local events and other initiatives provide opportunities for participation, learning and socialisation. A notable role player in this work is "**WeAreRichmond**" the authors of this submission.

We endorse the need to develop a long term spatial plan to ensure the survival of, and the existence of a thriving community embracing Christchurch City and the outlying districts of Waimakariri and Selwyn. The need to develop holistic approaches to such issues as population growth, provision of infrastructure, heritage preservation, conservation, housing, area amenities, cultural partnerships and transport systems in sustainable and collaborative ways is absolutely vital when planning for our current and future generations.

SPECIFIC DISCUSSION POINTS

Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people. Item 3 - Spatial Plan

Avoid development in areas with significant natural values

- We do not want to see development in areas with significant natural values. Some of the land in our suburb lies within the Red Zone created after the earthquakes and this has provided us with an opportunity to play a part in restoring this land to its natural state, thus providing long term ecological benefits while respecting the cultural heritage of the original inhabitants. There have already been efforts made to reclassify some red zone land to enable housing development. We want the long term considerations of ecological sustainability to override any such applications now and in the future.

Prioritise the health and wellbeing of water bodies

- Consideration must be given to protecting our waterways not just in Richmond but in those which are part of the greater Christchurch hydro system. Local groups have been very active in restoring natural freshwater habitats along the reaches of the Avon/Otākaro River and feeder streams and we do not want to lose the progress made because of a lack of consideration for 'downstream' waterways health when creating 'upstream projects' in the future.

Enhance and expand the network of green spaces

- Richmond is well served by green spaces but we are endeavouring to improve the vegetation coverage even further by encouraging the Council to plant more roadside trees and developing food chain links for our native birds and animals through a series of planned planting programmes. These must be acknowledged and supported with continued Council based resources.

Key Moves

A strengthened network of urban and town centres

- Consideration should be given to a facilitation process which enables a linking up of urban communities (suburban) to provide opportunities for discussing common concerns, and for the implementation of common ideas for continued development of each area. This would provide valuable cross-community participation, help maintain a sense of holistic unity in any wide regional planning and contribute to successful Greater Christchurch/local Council/community group government plan delivery.

A mass rapid transit system

- Consideration must be extended to the 'last half kilometre' of any transit system. Inner city suburbs will, because of their geographic locality, be part of 'linking' transit provider routes.
- The impacts of regular transport movements through inner city suburbs often characterised by narrow streets and congested commercial precincts must be

considered when planning an overall transit strategy including the major factors like embarkation/disembarkation points so important in any linked rail/rail/light rail/bus systems.

Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs. Item 4 – Spatial Plan

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

- Current HRD and MRD guidelines should be revised to acknowledge the overall effects on the surrounding infrastructure and the accumulative effect on social amenities. Is there a balance to be considered when striving for an increased population and the area which will ultimately support that increased population? The terms 'capacity to thrive', 'ability to thrive', 'capacity to contribute to the wider community', 'ability to contribute to the wider community', and importantly, 'sustainability', should be central to all future planning discussions.

Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth

- The pattern of growth should not focus solely on increased capacity to house an increased population. The critical capacity levels of supporting infrastructures must be considered so that housing intensification and population growth do not get out of alignment when increased capacity is being proposed. We would consider Richmond to be an example of an area which is at capacity in terms of population growth and density and that the pressure on the capacity of its supporting infrastructure is threatening its ability to thrive.

Provide housing choice and affordability

- We would consider that Richmond has a balance of the availability of mixed housing types but that the spread of that availability has been compromised by the extensive building of multi-level homes/apartments in concentrated areas of the suburb. The balance of space between all different housing types must be considered more by the planning authorities when granting resource consents.
- Current heritage plans and special amenity conditions should be preserved.
- The current intensity of social housing units, particularly in South Richmond should also be considered when viewing the overall housing capacity spectrum.

Deliver thriving neighbourhoods with quality developments and supporting community infrastructure

- We would strongly suggest that all future buildings have a long and sustainable future facilitated by modern design, governed by climate change considerations, and the individual place within the overall jigsaw of the whole Richmond community.

- Consideration of the physical and social needs of the existing and new residents must be considered so that preservation and awareness of cultural values and opportunities for vibrant social interactions are preserved.
- The local volunteer groups operating in Richmond generally enjoy good support from the community and local government groups. These relationships must be fostered and encouraged to grow through genuine partnerships rather than through ad hoc conversations and current bureaucratic procedures.

Provide space for businesses and the economy to prosper in a low carbon future. Item 5, Spatial Plan

A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services

- Concern is often expressed in Richmond about the range of services and shopping facilities. These concerns cover the range of shops, an overabundance of certain types of shops and the complete absence of others. While the type of retail outlet is largely determined by the owner/tenant arrangements, thought could be given to ways to encourage a more diverse range of retail outlets and establishment of premises for professional services. This diversity would contribute towards the community's ability to develop some degree of self-sustainability and the ability to thrive in this changing world.

Provision of strategic infrastructure that is resilient, efficient and meets the needs of a modern society and economy

- As stated earlier, Richmond is one of Christchurch's oldest suburbs and maintenance of its services infrastructure was largely neglected for many years until the earthquakes exposed many weaknesses and identified requirements to update infrastructure, particularly roading and footpaths. We do not want to see practices reflecting a 'pothole politics' mentality when work projects are planned. We also suggest the role that local residents can play should be given higher priority so that we can establish a future proof and resilient community as we move into an unpredictable future.

Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities. Item 6, Spatial Plan

Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility

- There is opportunity for the continued development of attractive functional walkways and cycleways in Richmond. A thorough look at the Stanmore Shopping Precinct between Draper Street and North Avon Road could inspire visions of a shopper friendly space with endless innovative design and landscaping possibilities while still acknowledging the importance of the road as a commuter link.
- Cross Richmond links have been explored and community driven walks established to generate interest and pride in the suburb's natural features and its heritage. Continued support for these ventures is desirable.

Develop innovative measures to encourage people to change their travel behaviours

- Consideration must be given to the pace of change so that a gradual assimilation to the desired outcomes is achieved within a reasonable time span eg. the disjoint created when erecting housing developments with few garaging facilities. People do not abandon their cars overnight and therefore, strategically interim transition planning is important to smooth any such processes.
- The residents of Richmond are already demonstrating innovation in their methods of travel by using a variety of conveyances; scooters, skateboards, etc. Encouragement of this developing trend could be enhanced by continuing to address the needs of these innovative commuters by establishing safe passages through the suburb's streets for local residents and city-bound and eastern commuters.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 01/08/2023

First name: Alan **Last name:** Grey

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Submission on the GCSP (GREY)

Submission on the Greater Christchurch Spatial Plan

Alan R Grey, 23 July 2023

Background

I have lived in Christchurch as an adult most years since 1989, and my family has had association with the city for 150 years. I have seen clearly how the city has developed, and have had experience in seeing decisions made at the council level that have been hidden from the public despite their widespread impact. I have 8 years' tertiary education, with a BSc, MSc (Hons I), Dip Tchg, and PGDipSSER, and have been a member of the American Evaluation Association for 10 years. I am a ratepayer, have extensive experience in analysing strategic documents, and am well qualified academically and in experience to comment on the Greater Christchurch Spatial Plan (*hereafter*, GCSP).

My view

I could comment in detail on the GCSP, but it is short on details, so I will largely restrict my comments to high-level issues that ought to be given careful consideration because of how they can undercut the justification for the plan as devised. This puts to one side the potentially positive aspects to the plan, such as the need to deal with hazards better, and protecting strategic infrastructure. It is important to get the high-level issues right first.

My summary position is that the plan (as a whole and not by component) is fatally flawed, and it would be a serious mistake to move forward with it. It requires forecasting a future that is subject to many complexities that are unknowable and could render the plan and its directions useless at best and damaging at worst. In addition, the plan would commit the council—sorry, the *ratepayers*—to a debt-laden future that would encumber generations and leave this cohort of planners, council staff and local body politicians having no accountability for their adverse impact on people's lives.

Critical problems and issues

There are many problems and issues that undermine the utility and value of the plan—so much that the plan is of little worth except in terms of bureaucratic employment opportunities. I briefly summarise some of the key, high-level weaknesses in the plan.

Hubris in forecasting the future. The plan is based on projections that the population will have increased to 700,000 people by 2050 and over a million within the next 60 years “if not earlier” (p.13). This is based on unstated demographic reasoning, and therefore is designed simply to scare people into thinking there is a problem to be solved. While a graph is given on p.70 to convince everyone of these population outcomes, it appears to be in error anyway. It shows that for 2023, the population of Greater Christchurch is approximately 570,000, which is obviously incorrect. StatsNZ shows the population of ALL of Waimakariri and Selwyn Districts, and Christchurch City (including Banks Peninsula) to be 489,000 in 2018, so it is hardly likely to be >560,000 five years later in a much smaller geographic range.

In reality, there is *nothing* to indicate that those population outcomes are likely. Demographics are somewhat predictable, based on current population demographic structures, because things like natality and mortality are well constrained. That being the case, Christchurch currently has a classic *negative growth* pyramid (see <https://www.stats.govt.nz/tools/2018-census-place-summaries/christchurch-city>). On that basis alone, and without any external stimuli, the population WILL *decrease*, and the ONLY way for it to increase is through net migration into the city. (This is implied by the graph on p.70, where the number of children increase extremely slowly compared to the other age groups.) To achieve the population figures stated in the plan would require huge levels of migration, *either*

inter-country or intra-country. *However*, there is NO way of knowing whether such levels of *net* migration can, could or would be achieved. At a macro-level, many, if not most, developed nations have similar or worse demographic issues. This means that in coming decades there is quite literally no way of knowing how the inter-country migration issue will evolve as developed countries across the world basically compete for people. We have a weak economy and so few ways to draw people to this country economically, which is why so many skilled New Zealanders leave for Australia, a trend that is likely to be ongoing or increase. Similarly, if we have large-scale intra-country migration to the region, then other parts of New Zealand will increasingly suffer through population decline, which will have adverse effects on the country as a whole, and we will have to deal with those effects in Christchurch regardless.

This is only *one* aspect of uncertainty in planning for an unknowable future. If there is one thing that history teaches us, it is that central planning—having bureaucracies of *any* type plan future structures and actions—*never* works. Bureaucracies have a life of their own, and are completely inadequate for understanding what the future looks like. This is not a comment on the capabilities of individuals, but on the nature of bureaucratic collectives. Most recently, witness the something as apparently simple to predict as a pandemic, the predictions for which turned out to be catastrophically wrong—*everything* that was predicted was just plain *wrong*. Here, we are to believe that the council, central government and Māori can predict the future with sufficient robustness that we can commit billions to a plan for transport &c that is “needed”.

Logically flawed justifications for the plan. Among other things, the plan is said to be needed so that we have alternatives to private vehicles and reduce carbon emissions. Who said that these alternatives are needed? This is a rather weak assumption that is more about a driving ideology of public transport rather than need. It is definitely NOT the council’s responsibility to promote a view that private vehicles are causing problems. Besides, it is logically inconsistent with current trends. In particular, there is an ongoing increase in electric vehicle use in New Zealand. For example, StatsNZ data shows that there has been an increase in reduced-emissions vehicles from 10% of the fleet in August 2020 to 20% in February 2022, *just 18 months later* (see <https://www.stats.govt.nz/news/electric-vehicle-imports-accelerate-as-new-zealanders-look-to-the-future/>). It will not take long for the vast majority of the fleet to have low emissions, which then nullifies the argument that the plan will reduce emissions because *emissions will have already reduced due to other factors*, even if everyone still uses cars. On that basis, the plan has nothing to do with reduced emissions, and everything to do with a flawed philosophy of minimal car usage and maximised public transport.

Manipulative language of the plan. The plan, as presented and in its marketing and solicitation of feedback, is based on strong rhetorical propaganda. By this, I mean that a variety of rhetorical devices are used (e.g., describing only its *perceived* benefits in glowing terms) and designed to reduce any opposition to the plan. This is especially problematic when youth are targeted for feedback, as they apparently have been (see p.5), for they are much more inclined to accept statements uncritically and be susceptible to manipulation by language, *aside* from the fact that their sheer youth places them in a position of poorly understanding the nuances and complexity of issues in the real world.

It would be far more productive for democracy—for open, public debate about the plan—if there were alternatives given, and a clear description of the disadvantages, costs and negative aspects of the plan (which are numerous) and the alternatives, and so prove that the presented plan is the most robust one possible that aligns with legislative requirements.

Fails to meet legislative requirements. Further to the last point, this plan completely fails the test of demonstrating that the proposed infrastructure meets needs “in a way that is most cost-effective for households and businesses” (Local Government Act, 2002, §10). Councils *must* show this and prove effectiveness and efficiencies, not just present a broad, ill-defined plan that says effectively nothing

more than “we will make some transport corridors and have variable housing—and look at all the wonderful things that will do for Christchurch”. That’s just tilting at windmills.

Lack of details. While that plan makes a great show of a previous high level of support for the plan, it could be convincingly argued that this is primarily because it is a such a high level that few can disagree with the general thrust of the plan—no-one argues with “motherhood and apple pie”, but perhaps that is exactly the point. As with all things, if people knew the detail of what was involved (e.g., the extremely high likelihood of demolishing existing houses and businesses, creating new corridors, preventing cars from operating along certain routes, forced sales, limited parking associated with new housing etc.), then it is likely that the level of “support” for the plan would drop dramatically, and most people would oppose it. Another example of the need for more detail is how the plan blithely states that transport corridors could be train *or* bus. Well, the difference is massive in terms of cost and impact on the city, and would make a significant difference in terms of utility for the public, so the plan should state what is actually planned.

The importance of some detail can be illustrated by a simple analogy. If we were told by the powers that be that they wanted to prevent harm to puppies, then everyone would agree—“Yes, let’s prevent harm”. However, you could achieve that by executing anyone who caused a puppy harm, or you could just prevent such people from owning a puppy. Two quite different ways of going about it, yet still ostensibly achieve the same end that everyone agrees with. There is the same kind of thing happening with this plan and its lack of detail. There is a reason why the saying states, “The devil is in the detail”.

Regardless, given the lack of details alone, ***the plan should be dropped, re-formulated and discussed in more specific terms before it is established.***

Issues with personal choice and movement. A key failing is the assumption that people near the corridor need the corridor to travel to other areas. This makes little sense. People shift houses, jobs social connections and shopping priorities over time. What is good at one point in time is terrible at another. Thus, there is a constant background flow of people moving to different areas and having different preferred routes for their lives. This plan takes all that and forces one mass transit route with “one-dimensional” thinking, and makes it the solution to all transit problems. For example, enhanced public transport along certain corridors offers few benefits to most people in the city, for they still have to access the corridor, which means they have to get across town to it, which can lead to congestion and other associated issues, just the same as now.

In fact, the plan outlines preferred mass rapid transit routes that are weakly argued. The design appears to be solely around getting people from outlying areas into the central city. To what end? My question would be, “For *most* people, who even cares about the central city?” As far as I can tell, most people use it for entertainment (including eating), and half the time it appears “dead” compared to what it used to be. Having an important CBD is a concept from the twentieth century that takes no account of current trends in work environments. In addition, the planned routes completely ignore the strategic infrastructure, such as airport and port, which is surely a vital consideration for transport corridors, and ignores the areas where most people work (e.g., airport, university, industrial areas etc). Basically, the presented mass transport “solution” is a poor one for the perceived transport problems in the city, or, at the very least, a poorly justified one.

Affordable housing. This seems to be a desired outcome of the plan, but there is nothing to indicate that it would be achieved or achievable through this plan. For one thing, the plan takes an inconsistent approach, saying that there will be an increase in one-person households, and in the next breath, that there will be a need for more multi-generational housing. The main issue, though, is that there is already increased intensification of housing, including *all* the options laid out in the plan. Therefore, *what does the plan add to what is already happening?* I would argue ... nothing. Is the plan about defining *where* those types of housing should go? Such restrictions would be a huge mistake and likely lead to the creation of “ghettos” in certain areas, as happens and has happened overseas. By

definition, if you place “affordable” housing in one place, you force all those who have few resources to live primarily in certain areas that you have defined. That is a recipe for disaster.

Summary

I believe that while there are some aspects of the plan that could be useful, overall, it will fail to achieve what it is supposedly designed to do. It is poorly argued, it is not shown to be the most effective or efficient option available, it is based on seriously flawed and erroneous justifications, it interferes with basic freedoms of choice, and it plans for an unknowable future. If unknowable, then how do you rationally plan for it? It is by no means clear that the plan will be of any more value than even just a *laissez faire* approach that leaves Christchurch society to respond to market and social forces as they arise.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 02/08/2023

First name: H. **Last name:** Marsh

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
H Marsh - GCSP Submission

Scammell, Kelly

From: Huihui Mai
Sent: Monday, 24 July 2023 2:41 pm
To: MonitorSubmissions
Subject: FW: submission on the greater chch

From: H.Marsh [REDACTED]
Sent: Sunday, July 23, 2023 12:19 PM
To: Huihui Mai <huihuimai@greaterchristchurch.org.nz>
Subject: submission on the greater chch

Do you support the improved public transport system proposed in the draft Spatial Plan?

Answer:

Not at all.

The figures pertaining to population growth don't stack up. It's a paradox because, there is a depopulation agenda afoot. So how do you justify the condensed housing of high density living, unless you are progressing with the snatch of private properties under the un and guv agendas.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

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

Answer:

Not true.

You are definitely taking away people's rights and intentionally wanting to squeeze them into manageable units, with curtailed movement possibilities, and high density surveillance.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Answer:

No, because your intentions are deceptive. There is a policy coming into existence that intends to shut farmers down from being the producers of a wonderful country. That's not what I consider saving highly productive land (for what), and stealing land under SNAs. It's not your business to steal and recreate at the expense of others.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

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

Answer:

No. Your emphasis on “business and private sector investment” is too deliberate. I assume this is referring to corporate businesses and investments, and not supportive of the individuals who have small-time businesses providing for their families, and their futures. Public and private sector investments are high level targets, aligned to the UN agenda key words to disempower and over power.

Do you agree with the draft spatial strategy outlined above?

Answer:

No. And this is why not....

The first point becomes a racially divisive statement, like so many recent policies. Why is that? Why Maori land only, and not land that belongs to New Zealanders who haven't chosen to identify as Maori?

The second point supports all of the above points with flashy words, creating a world that none of you would wish to live in. It will take away personal ownership of property, homes, livelihoods. I assume you are aware of that.

It will sequester people against their will from the natural resources and fishing and hunting; remove privacy of their own living; remove their ability to create their own food sources and gardens; and remove humanity and soul from the human with forced control - both internally with chips and externally with environment.

The stealing of property is already evident by the impossible costs of homes and rates, compared to wages. I would have to consider this has been a gradual and deliberate manipulation to ensure people will become comfortable being given one of your homes in return for a microchipped social credit existence. First create the problem, then offer the solution. We all know what that means, and when that last happened. I refer to the creation of an illness to create forced mRNA vaccines (chipped and gene altering) on an unawakened community, and make existence impossible without compliance. What that achieved was to

make a society reliant on pharma products due to their ill health, and sterilised the next generation of children. So there is likely not going to be a population growth. If the effects of the vaxes become real, it will be reverse.

This is not supporting our children's futures, nor our grandchildren's - for at least those who will be able to safely produce children! It is controlling them into a microchipped social credit system that most can't yet imagine exists. Do your homework and know the truth about the intention for controls and removal of all human rights and properties as we know them. What world do you want to live in, and your children to inherit? Think carefully. Are you aware of the kind of people who will controlling those "institutions"? Do you realise this is the new Auschwitz plan?

And No, I'm not a conspiracy theorist.

I am someone who had done my homework, and made a choice not to support this agenda.

Sent with [Proton Mail](#) secure email.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 02/08/2023

First name: Colin **Last name:** Wightman

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Colin Wightman - GCSP Submission

[REDACTED]

From: Huihui Mai
Sent: Monday, 24 July 2023 2:42 pm
To: MonitorSubmissions
Subject: FW: Submission - wish to be heard

-----Original Message-----

From: [REDACTED]
Sent: Sunday, July 23, 2023 3:32 PM
To: Huihui Mai <huihuimai@greaterchristchurch.org.nz>
Subject: Submission - wish to be heard

Dear Sir/Madam. I have tried several times to make a submission with great difficulty. I'm not sure whether this email contains my written submission, if not, I still wish to be heard in regard to my views of the proposals put.

Thank-you. Colin Wightman 0276636401

<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgreaterchristchurch.org.nz%2Furbangrowthprogramme%2Fmake-a-submission&data=05%7C01%7CMonitorSubmissions%40ccc.govt.nz%7C34e059869b774bf2a99d08db8bef8ba9%7C45c97e4ebd8d4ddcbd6e2d62daa2a011%7C0%7C0%7C638257633171561586%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliCjB1Ijoi6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=RW5mTOhC8V3iSRoBzXTQRDmQyrvWkQH4TJssTzqY4oQ%3D&reserved=0>

Sent from my iPhone

[REDACTED]

From: [REDACTED]
Sent: Friday, 4 August 2023 10:17 am
To: [REDACTED]
Subject: Greater Christchurch Spatial Plan submission

Kia ora Colin

Thank you for your email regarding the difficulties you had making a submission. We are sorry the submission process did not work for you.

We have recorded that you made a submission and would like to speak to the Hearing Panel. We will be in touch in due course regarding hearing dates.

In the meantime, to allow proper consideration of your views, would you be able to provide me with your written submission as this was not attached to the email of 23 July to huihui@greaterchristchurch.org.nz?

Ngā mihi



Civic Offices, 53 Hereford Street, Christchurch 8013

PO Box 73016, Christchurch 8154

 ccc.govt.nz

Christchurch
City Council 

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 02/08/2023

First name: Robina **Last name:** Dobbie

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Robina Dobbie - GCSP Submission
Robina Dobbie - GCSP Submission1

Scammell, Kelly

From: Huihui Mai
Sent: Monday, 24 July 2023 2:38 pm
To: MonitorSubmissions
Subject: FW: Submission Form

From: Robina Dobbie [REDACTED]
Sent: Friday, July 21, 2023 11:53 PM
To: Huihui Mai <huihuimai@greaterchristchurch.org.nz>
Subject: Submission Form

Hello

Please provide an objection form for the Greater Christchurch Spatial Plan.

Thank you
Robbie

Robina Dobbie
[REDACTED]

Scammell, Kelly

From: Secretariat Greater Christchurch
Sent: Friday, 28 July 2023 10:09 am
To: MonitorSubmissions
Subject: FW: Submission of Greater Christchurch Spatial Plan

fyi

Jenny Wilkinson

[REDACTED]



From: Robina Dobbie [REDACTED]
Sent: Friday, July 28, 2023 8:59 AM
To: Secretariat Greater Christchurch <secretariat@greaterchristchurch.org.nz>
Subject: Re: Submission of Greater Christchurch Spatial Plan

1. [REDACTED]
2. Yes

[Sent from Yahoo Mail on Android](#)

On Fri, 28 Jul 2023 at 6:43, Secretariat Greater Christchurch <secretariat@greaterchristchurch.org.nz> wrote:

Good morning Robbie

Thank you for your recent submission on the Greater Christchurch Spatial Plan.

We would be extremely grateful if can you please provide us with the following additional information:

1. Mailing address
2. If you would like to be heard at a hearing panel

We particularly require this if you are wishing to be heard at a future hearing panel.

We look forward to hearing from you.

Thank you and kindest regards

Jenny Wilkinson

[Redacted signature block]



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**Christchurch Envirohub
Botanical Garden Kiosk**

1. Do you support the improved public transport system proposed in the draft Spatial Plan?

The proposal to improve the public transport system by using rapid transit lines would be beneficial to creating a more sustainable urban environment within Greater Christchurch. People living far from and working within the central city may decide to commute to work regularly using this improved public transport as it will be faster and more reliable than the busing system that is currently available. However, there are a few things that this mass rapid transit system may need. Parking spaces that are available near the main stations along the route may encourage people not living next to the route to use the transportation. In these areas, there should also be protection from rainfall and wind, toilet facilities, and potentially food and beverage outlets. As for the route, having minimal interruption from other vehicles to reduce traffic congestion will make the transit more efficient and desirable to use. On board the transit vehicle, ensure there is enough space for bikes and consider including toilets. Alongside the route, there could be a native vegetation line to reduce noise to housing, which is set to intensify along the route.

- 2. Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.**
- **Do you agree that we should focus future development and investment around urban centres and transport corridors?**

It is crucial to provide housing for the growing population in Greater Christchurch. Intensified urban development allows more people to have access to facilities, such as supermarkets, libraries, and healthcare. We need to ensure people living in these areas with little personal space, i.e. apartments/townhouses, have access to space nearby, such as parks and community gardens. To encourage active transport in these areas, include cycle lanes along the streets. It is great intensification will occur along the public transport corridors as more people will find public transport convenient due to living nearby an efficient system.

- 3. The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly**

productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

- **Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?**

Urban areas are expanding across New Zealand. Therefore, it is important to maintain and enhance the natural environment within these areas. There are many areas that may be restored, such as what is being done with the Greenbelt. There should be more effort to create eco sanctuaries that are predator-free.

- 4. One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.**

Do you support the concept of a Greenbelt around our urban areas?

Wrapping a Greenbelt around each of the urban areas would be beneficial as it may help contain urban sprawl and create corridors for native animals to travel in around the urban areas. This may also be applied around intensified areas within the urban areas, further enhancing the intensification and containing sprawl.

- 5. Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:**

- **Offer opportunities for accelerated and/or significant development;**
- **Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and**
- **Are in key locations where successful development gives effect to the draft Spatial Plan.**

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

The areas for intensification are good. The centre of each area should be primarily designed for active transport, with faster roads wrapping around the areas of development to encourage less traffic within the centre.

6. Do you agree with the draft spatial strategy outlined.

The 6 priorities outlined within the draft spatial strategy appear to be equal in power. However, action favouring the economically driven priorities, number 5 and 6, may eventually outweigh the environmentally focused priorities, number 1, 2, and 3, as they often have done so in the past. To counteract this, make environmental priorities the most influential factors in the plan.

Kind regards,

Ben Alder – Trust Manager and
Jocelyn Pappill – Chairperson.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 22/08/2023

First name: E and C **Last name:** Hobbs

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Feedback

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

No

Why:

See attached submission

Attached Documents

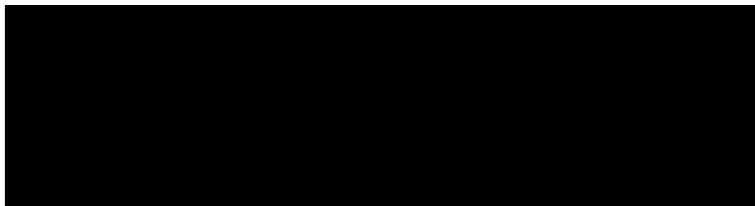
File

OBJECTION TO THE SPATIAL PLAN FOR CHRISTCHURCH

OBJECTION TO THE SPATIAL PLAN FOR CHRISTCHURCH

I WISH TO BE HEARD.

E. and C. Hobbs



FEEDBACK IN BRIEF:

1. We have no issue with planning for the future, but want no part whatsoever in our city being turned into a “15-minute city” as envisaged by unelected off-shore cabals, including, but not limited to, the World Economic Forum and the UN.
2. Christchurch should be limited in the height of building due to the propensity for earthquakes. My husband and I were in Christchurch as first responders in February 2011, and we are fully aware of the devastation that can be caused. Afterwards, buildings were slotted to be no higher than four storeys. That has changed as memories of some have dimmed as to the degree of tragedy the earthquakes caused. Our memories have not. There must be a limit.
3. Christchurch is going from bad to worse insofar as being a user-friendly city. To understand what is meant by this please take a drive down Manchester Street. The job of the CCC is to enable ratepayers to be able to move from A to B without issues, delays, waiting in very long queues to turn right or left while the lights change from green to red a number of times before making it through an intersection. Footpaths are as wide as car lanes along with accompanying vegetation alongside while the lanes for cars and service vehicles are cramped into a minimum of space. It seems an intentional move to dissuade people from driving, while ignoring the fact that not everyone is able to hop onto a bike in all weathers and carry gear with them, or collect children from school.
4. Christchurch was built by our pioneers and it took generations of hard-working ancestors to create the city. It was initially formed as a market town for locals and those outlying areas where needed supplies and services could be obtained. People who lived in the country sent their produce into the city to sell. Market gardeners also

need ready access to the shops they supply in the city. They are unable to use public transport either. This is still the case. It is simply not possible to hop onto a bike or take a bus or other public transport, to purchase supplies, and try to load them all onto a bus. It is not practical for New Zealanders.

5. Tradespeople also need vans and trucks to carry their gear. They need to have easy access in and out of the city. It is impractical to have them loading all their gear onto public transport.
6. We do not need to cram people into high rise buildings without spirit and squeeze them all in cheek-by-jowl. Attractive enough in drawings by landscape architects, but in reality they can fast become lifeless and in need of upkeep in many places. Part of the beauty of NZ is the space. We need to retain that in balance as well. We need to keep the balance and ensure any immigration is also balanced.
7. The Garden City was stunning, but in many places it is now sullied by depressing graffiti street art and strange sculptures that have little or no soul, in lieu of the magnificent trees and gardens on street corners that were of great joy, and counter-balanced the concrete buildings, bringing life-giving oxygen while taking in carbon dioxide. The perfect balance.
8. We need to treasure our pure artesian water, remove the unneeded toxic chlorine that is unnecessary, poisonous, and also causes the body to lose vital iodine. (Ref: Dr D.C. Jarvis MD) We must not allow the addition of fluoride to the water supply, as it [causes a lowering of IQ in babies and young children as well as many other proven health defects in others](#). The fluoride added to the water is [sourced from aluminium and fertiliser factories](#). It is a waste product so toxic that, by law, it is forbidden to dispose of it on land, in water, or in the sea. It does not belong in our drinking water. Far cheaper ways of obtaining fluoride are already available. There is a reason why warnings appear on tubes of fluoridated toothpaste. Free toothpaste could be given out instead.
9. Residents need a council that will provide the basics: Good drainage, clean beaches (the Sumner beach regularly has sewerage coming in on the tide and leaving unsightly toxic froth), good rubbish collection, minimal road-cones and road works – possibly again intended to make motorists “mend their ways” – good sewerage disposal that doesn’t pollute the air of nearby residents or foul the beaches, and basic lights that

are not 24/7 surveillance tools, as described in the strange dystopian world of the WEF Agenda 2030. They want local libraries and swimming pools, good footpaths, and beautiful parks and gardens well-maintained. Basic museums are also of value, but not unnecessarily ripping down the old to replace it at exorbitant cost when it is simply not necessary. Another budget blowout. It would also be good to see the local Robert McDougall Gallery that was gifted to the city to be maintained how the owner envisaged. (Not everyone wants to see “modern” art all the time.)

10. Ratepayers do not need budget blowouts on huge stadiums in the inner city where the sound will vibrate every apartment building within a 2km radius, fireworks, banners up for various parades and seasons, pedestrian crossings painted in varying shades, or any flags announcing the latest new thing. We need to trim the rates rather than spend to the point where the city is deep in debt. Rates are at a shocking level already, despite the best intentions of councillors.
11. Ratepayers have NOT consented to constant budget blowouts with regular rate hikes.
12. Ratepayers have NOT consented to an invisible unelected group of LGNZ officials dictating to our councillors and telling them what to promote and what to ignore and what they must spend money on. It is NOT the money of the LGNZ, it is the hard-earned money of ratepayers who simply want the basics well-maintained.
13. The council needs to represent its citizens, not obey the dictates of hidden influences trying to wheedle their way into the minutiae of the relationship between the council and the ratepayers.
14. The CCC needs to unhobble itself from the LGNZ which is just another government department trying to order ratepayers about. Ratepayers do not need that. Ratepayers have elected councillors to represent, not to dictate, and they do not want government meddling in local matters.
15. Recently I heard – and I hope it is not true – that councils linked to the LGNZ cannot borrow money from the LGNZ unless the council agrees to put up the private property of ratepayers as security. Is this correct? If so, then you need to know that you don’t have the consent of ratepayers unless you specifically ask them. I don’t know of anyone who would agree to that, particularly with no control over how the

council spends its money. If this is correct then you need to make this clearly known to every ratepayer. No money can be borrowed from the LGNZ if this is the case. We most certainly do NOT consent. The council must be honest with all people it purports to represent.

16. Is the “spatial plan” a euphemism for a 15-minute city where Christchurch residents are unable to travel further than 15-minutes due to “climate change” except on one or two occasions every year? If this is correct then, again, you need to be honest with all residents in Christchurch. Make it known. People need to know. Then they can validly voice their opinion.
17. One of the opportunities is to “protect, restore and enhance historic heritage and sites and areas of significance to Maori. There is no mention of the historic heritage and sites and areas of significance to non-Maori. Why is that? This is a democracy is it not? Non-Maori have a wonderful history here too. There are areas of historic heritage and sites and areas of significance to non-Maori and they must be protected, restored and enhanced, also.
18. Climate change is a political football. Please advise if you need to see books on the advance and retreat of glaciers dating back to the 1860s through to the 1940s. They ebb and flow. Glaciers from Aoraki Mount Cook National Park used to reach to Twizel, many thousands of years before “climate change” was ever invented by an American politician who apparently has mansion near the sea.. Councils have no business following politicised agendas.
19. Another opportunity is to “protect, restore and enhance the natural environment with particular focus on tea o Maori.” This city is for all people. It must be inclusive.

I heard about the invitation to write in about this “spatial plan” yesterday, 22 July 2022. Unplanned hours have been spent on this objection today in order to be able to get it in before the deadline of 23 July 2023. I do not consider it was well-advertised and the time given to respond (less than four weeks) is insufficient to do justice to a 94-page report at such short notice, but I have given it a shot with this summary, key of which is a deep and genuine concern over the extent of influence that unelected off-shore corporations have on LGNZ, the NZ “government” and councils throughout the country. There should be no one between the council and those it is there to represent.

Most councillors work hard to do their best in difficult circumstances and this is understood. But if there is undue influence and pressure on councillors that is contrary to what residents of the area want, and that interferes in any way with being able to provide the basics to all people in the Christchurch area and *genuinely represent them*, then the councillors need to communicate this to the people, as they pay rates for what they understand are key basic services, and expect the council to keep within budget. If there is pressure to spend to the extent there is a substantial budget blowout (as this “spatial plan” looks set to be), then the CCC should decline it as they don’t have the mandate of the people and they most certainly do not have any permission to put the homes and property of ratepayers up as security.

Apologies for any errors on this objection, due to what little time I had to get it in within the deadline.

Be true to those you are there to represent. If this a 15-minute city plan camouflaged as a “spatial plan” then all ratepayers and residents have a right to know.

Thank you.

E and C Hobbs