

# Greater Christchurch Partnership

Going for Housing Growth Submission

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development Ministry of Environment — Manatū Mō Te Taiao gfhg@hud.govt.nz



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### Submission on the Going for Housing Growth – Discussion paper

Thank you for the opportunity to provide feedback on the Going for Housing Growth – Discussion paper.

This submission represents the views of our local government partners: Christchurch City Council, Canterbury Regional Council (Environment Canterbury), Selwyn District Council and Waimakariri District Council, allowing our other Partners to maintain their neutrality.

#### 1. Greater Christchurch Partnership (GCP) Introduction

The <u>Greater Christchurch Partnership (GCP)</u> is a voluntary coalition of local government, mana whenua and government agencies working collaboratively to address strategic challenges and opportunities for Greater Christchurch sub-region.

Our purpose is to take a collaborative approach to address strategic challenges and opportunities for Greater Christchurch.

The Partnership is built on a strong foundation of mutual respect and trust, transparency and a strong commitment to achieving the best for the community, now and into the future.

In early 2022, the Greater Christchurch Partnership Committee and the Crown agreed to form an Urban Growth Partnership for Greater Christchurch.

A partnership approach is seen as essential in managing the complex challenges of urban growth, ensuring aligned strategies, pooling expertise, and delivering integrated outcomes across multiple jurisdictions and agencies.

Our area of focus spans the Greater Christchurch sub-region, covering Christchurch City, Waimakariri District and Selwyn District —representing over 10% of New Zealand's population and over 80% of the Waitaha Canterbury region – and the second largest population centre in Aotearoa after Auckland. The sub-region encompasses the traditional territories of three Papatipu Rūnanga: Te Ngāi Tūāhuriri, Taumutu and Te Hapū o Ngāti Wheke (Rapaki).

#### 2. Partnership Context

The Greater Christchurch sub-region benefits from a robust planning framework designed to guide and facilitate sustainable urban growth. Central to this is the <u>Greater Christchurch Spatial Plan</u> (GCSP).

Following extensive engagement with residents of Greater Christchurch and endorsement by the Greater Christchurch Partnership Committee, the Greater Christchurch Spatial Plan has now been formally adopted by our Local Government Partner Councils. The plan has significant public support.

The Plan provides a blueprint of how population and business growth will be accommodated in Greater Christchurch over the next thirty years. The two overarching directions of the Plan are:

- Focus growth through targeted intensification in urban and town centres and along public transport corridors.
- Enable the prosperous development of kāinga nohoanga on Māori Land and within urban areas

The Partnership's current priorities, aligned to the Greater Christchurch Spatial Plan, include:

- Sub-regional Growth Planning: Coordinated growth management to support housing supply and infrastructure development.
- Kāinga Nohoanga: 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
- Housing: Enable diverse, quality, and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs and addressing the gaps in the private housing market.
- Transport: Prioritise sustainable and accessible transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables economic growth and access to social, cultural and economic opportunities.
- Priority Areas: A collective focus on unlocking the potential of Priority Areas. Coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment in catalysing development and intensification in these areas.

These priorities form the foundation for collaborative action and are integral to delivering sustainable urban growth.

#### 3. The High Level Asks of the Partnership

The Partnership broadly supports the Government's commitment to housing growth and the integrated approach outlined in the Going for Housing Growth Discussion Paper July 2025. It is acknowledged that the Going for Housing Growth Programme's value lies in its holistic approach across its three pillars and that the details and proposals in Pillars 2 and Pillar 3 are still to be released. This will lead to the Partnerships positions evolving over time as the detail on the Programme and the new resource management system emerges.

The key points which are further expanded upon in section 4 of this submission, involve:

A. Regional spatial planning is critical to the success of the new Resource Management system

- Make spatial planning central to the new resource management system to manage growth in a coordinated, integrated, and strategic way that aligns land use, infrastructure, and environmental outcomes.
- Support realising kāinga nohoanga: Ensure mana whenua have genuine involvement in the
  design of the new resource management system and the Going for Housing Growth
  programme, with the Partnership seeking two immediate actions be implemented to
  advance the Kāinga Nohoanga Strategy on Māori reserves and urban land in Greater
  Christchurch.
- Ensure Government sets high-level strategic direction early, before regional spatial strategies are developed, to prevent misalignment and costly plan changes mid-process.
- Support quality, not just quantity, by embedding expectations for well-functioning, liveable urban environments—rather than focusing solely on housing supply.
- Recognise social and affordable housing as essential infrastructure, requiring explicit inclusion in planning frameworks and delivery tools.

- Embed environmental values (e.g. blue-green networks) and whole-of-life infrastructure costs into planning to promote resilient, sustainable growth.
- Recognise the importance of blue-green network infrastructure in supporting good quality development outcomes and cost-effective stormwater management.

B. Use the Greater Christchurch Spa**ti**al Plan (GCSP) as the sub-regional basis for expanded regional spa**ti**al planning

- Retain GCSP as a foundation for sub-regional planning within Canterbury's regional spatial strategy, given its recent adoption, robust evidence base, and strong public engagement.
- Allow sub-regional focus in regional spatial plans, especially for urban growth partnerships like Greater Christchurch.
- Avoid duplication and protect investment in existing collaborative planning by recognising and integrating spatial plans like the GCSP into the new system.
- Strengthen the role of spatial planning in guiding infrastructure, land use, and investment decisions across government, mana whenua, and local partners.
- C. Progressing the details of implementing the Going for Housing Growth direction
  - Government to fund its role in delivering social and affordable housing in Greater Christchurch, including through direct delivery or subsidies for providers.
  - Consider introducing a value capture mechanism to augment public sector funding for new social and affordable housing products in the sub-region.
  - Align development levies and GST-sharing mechanisms under Pillar 2 to generate sustainable infrastructure and housing funding streams for councils and partners.

D. Considering the urban interface with the surrounding rural areas of Greater Christchurch and the broader Waitaha Canterbury region

- Do not prohibit councils from managing rural-urban interfaces where it is necessary to prevent costly, uncoordinated leapfrog development.
- Ensure **fl**exibility doesn't undermine spa**ti**al planning, investment certainty, or environmental and infrastructure outcomes.
- Require unanticipated development to prove alignment with spatial strategies, environmental limits, and available infrastructure funding.
- Support growth paying for growth, in ensuring councils aren't left to fund infrastructure in unplanned areas and without a sustainable rating base or developer contributions to cover 'whole of life' costs.
- Clarify key definitions (e.g. 'urban environment', 'well-functioning urban environment') to support consistent application, provide efficiencies and boost public and private sector investment confidence.

#### 4. Partnership responses to the Discussion Paper

This submission focuses on the proposals within the Going for Housing Growth Discussion Paper of greatest relevance to the sub-regional context of Greater Christchurch and the role of the Greater Christchurch Partnership. It does not provide responses to all questions in the discussion document.

### Discussion Paper Topic & Questions

#### Partnership feedback and high level asks

Urban development in the new resource management system – Question 1

What does the new resource management system need to do to enable good housing and urban development outcomes?

At a high level the Partnership seeks the following outcomes through the new resource management system:

- Clear outcomes for housing, urban development and infrastructure and the environment, with the Partners provided with the tools and sufficient funding sources to deliver their responsibilities as part of the overall system.
- 2. Gives confidence to Partners in fulfilling their roles in the new system and provides certainty to the community and development sector.
- 3. High level strategic directions by Government prior to the preparation of regional spatial strategies to provide certainty of what needs to be implemented by partners before work commences. All partner Councils have had recent experience in cost and time delays that eventuate when trying to amend documents already in statutory processes to align with evolving national direction that proposes opposing outcomes. For example, while Waimakariri was preparing its District Plan, the National Policy Statement for Indigenous Biodiversity (NPS-IB) changed several times: it started as a draft, then became a requirement to be implemented in the District Plan and was later amended so that the District Plan no longer needed to give effect to it.
- 4. Recognition that within the context of urban development and growth in the new resource management system that social and affordable housing form part of essential social infrastructure aligned to the Greater Christchurch Partnership's Joint Housing Action Plan.
- 5. Spatial planning is a critical mechanism to provide for the integrated management of our land, water and coastal environments that should play a central role in the new resource management system.
- 6. The system should promote coordinated, sequenced growth aligned with infrastructure planning and regional spatial plans. The new system should place emphasis on achieving well-functioning and liveable urban environments, alongside providing sufficient development capacity. Current settings have tended to prioritise development capacity with greater weight on delivering more housing supply, and less on achieving 'good' housing outcomes and that these still need to be achieved in the new system Sometimes, quantity of housing is prioritised without enough focus on the quality of housing and urban outcomes. In reality we are looking for a combination of both.
- 7. Explicit recognition in the new system of the value of the natural environment in achieving well-functioning, resilient urban areas. For instance, an enhanced and expanded blue-green network is a 'key move' in the Greater Christchurch Spatial Plan, recognising the important role of natural assets such as waterways, wetlands, and green spaces in supporting climate resilience, liveability, and biodiversity.
- 8. Blue-green infrastructure is a key element of the Greater Christchurch Spatial Plan, enabling quality development and cost-effective stormwater management, including for higher-density areas.

- 9. The Partnership encourages a stronger emphasis on ensuring planning decisions support not just growth, but well-managed, high-quality growth in the right locations, that contributes to the development of quality urban environments both within existing urban areas and future greenfield developments. It is important that the system encourages consideration of how new development contributes to a well-functioning urban environment beyond the boundaries of the development.
- 10. The new system and the Going for Housing Growth programme factor in consideration of the 'whole of life' costs of growth paying for growth and a development proposals impact on network infrastructure outside of the development and the performance of these networks; including in preventing situations in which Councils have to fund 'leapfrogged' development areas that do not have a new rating basis to support ongoing maintenance.

Impacts of proposals on Māori - Question 35

Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?

- 11. The new system must strengthen recognition of Treaty Settlements and uphold the rights and interests of Māori guaranteed under Te Tiriti o Waitangi.
- 12. The Partnership recommends the Government pursue meaningful involvement of mana whenua in the design of the new resource management system and the pillars of the Going for Housing Growth programme to support realising kāinga nohoanga on Māori reserves and urban land.
- 13. The Partnership has received the Kāinga Nohoanga Strategy for Greater Christchurch He Rautaki mō Kāinga Nohoanga Greater Christchurch (the Strategy). The Partnership and individual councils are progressively working to resolve issues. We seek to work with the Government to scope and implement actions from the Strategy, recognising that kāinga nohoanga is a broader concept than papakāinga.
- 14. As part of designing the new Resource Management system, the Partnership requests the Government to:
  a. Make a Māori purpose zone a standard zone in the new system, with details developed regionally.
  b. Include a deeming mechanism for Māori-owned land, as outlined in the Strategy, to improve efficiency and provide greater certainty.

Future development strategies and spatial planning – Question 2 How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

- 15. Regional spatial planning presents a number of opportunities. Partners recognise that to capitalise on these properly will require ongoing collaboration across local government, mana whenua and central government agencies, which Greater Christchurch Partnership as an Urban Growth Partnership is well placed to support.
- 16. The Greater Christchurch Spatial Plan (GCSP) should remain the foundation for growth planning in the Greater Christchurch sub-region, as part of the broader regional spatial planning for Canterbury. This reflects its recent adoption in 2024, its robust development and evidence base, and the extensive community engagement that informed it.
- 17. Existing spatial plans should be recognised as a foundation for regional spatial planning under the new resource management system. This will support continuity in spatial planning, avoid duplication, and ensure

- efficient use of public resources already invested in collaborative planning processes. The Partnership considers that retaining the framework of the GCSP will also provide certainty of public and private investment within areas that are appropriate to develop in the transitional period and prior to the GCSP 5 year review cycle.
- 18. The Partnership supports the requirement for each region to prepare a spatial plan, while emphasising the importance of allowing flexibility for local authorities to focus on sub-regional areas. The Partnership agrees that spatial plans should carry greater weight in land use and regulatory decisions and play a key role in informing transport and infrastructure planning and investment.
- 19. The Partnership acknowledges the need for flexibility to consider outof-sequence or unanticipated development. However, such proposals –
  including those made under the Fast-track Approvals Act 2024 should
  be required to demonstrate that they do not undermine the intent of
  the spatial plan or impose unplanned infrastructure costs on existing
  communities and fiscal risks to Council from 'out of sequence'
  development and infrastructure provision. The Partnership also
  emphasises the importance of ensuring that any such proposals actively
  support a well-functioning urban environment, are consistent with the
  spatial plan's objectives, and reinforce rather than compromise planned
  growth areas.
- 20. Some types of applications risk undermining the significant investment by local authorities, mana whenua, communities, and other partners in developing a long-term, agreed spatial vision for the region. In practice, 'out of sequence' or 'unplanned' development draws demand away from existing areas where infrastructure has been planned, and where decisions have been made to invest in infrastructure that can generate a return on investment for Councils.
- 21. The Partnership notes that Ministers will consider how different groups should be involved in the process of spatial planning and so recommends meaningful involvement with iwi and hapū who hold mana whenua within the relevant takiwā.
- 22. Any proposal to expand the list of matters that inform spatial planning should include cultural considerations such as the protection of wāhi tapu, wāhi taonga, cultural landscapes and customary rights, to ensure Māori interests are embedded from the outset.

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<sup>&</sup>lt;sup>1</sup> Twenty-two projects in the Canterbury region were included in Schedule 2 of the FTA Act. Twelve of the listed projects are located within the area covered by the Greater Christchurch Spatial Plan. Of the nearly 8,400 additional homes indicatively provided for across the listed projects located in Greater Christchurch, over 7,000 would be developed in greenfield locations outside the areas identified for future growth in the Greater Christchurch Spatial Plan and Canterbury Regional Policy Statement. Should all such proposals be approved, the scale of housing and commercial development proposed has the potential to undermine the urban form and transport outcomes in the Spatial Plan and result in additional infrastructure and servicing costs to local authorities.

Responsive planning -Questions 16 and 17 Are mechanisms needed in the new resource management system to ensure councils are responsive to unanticipated or out-of-sequence developments? If so, how should these be designed? How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?

- 23. The integration of the Going for Housing Growth Programme with the design of the new resource management system presents an opportunity to consider how best to enact the 'growth pays for growth' direction.
- 24. The Partnership supports having a mechanism to consider new development proposals. However, where Partnerships, iwi, and communities have invested in spatial planning and the coordinated delivery of infrastructure to support projected growth, any new proposals should be required to clearly demonstrate their merit. The addition of development capacity alone should not justify unanticipated or out-of-sequence developments.
- 25. Development in areas not planned for growth can impose significant additional costs both through the need to deliver unplanned infrastructure and by undermining planned infrastructure investment in growth areas, which rely on anticipated populations to affordably fund upgrades. Unplanned development can otherwise take up infrastructure capacity that would otherwise provide for development in more optimal locations, adding complexity and risk to Councils. A focus on development in planned locations, through spatial planning, helps ensure cost-effective and efficient use of resources.
- 26. The Partnership strongly recommends that responsive planning provisions be clearly aligned with the requirements to support well-functioning urban environments and must not override or undermine the strategic urban growth frameworks established in spatial plans and regulatory instruments.
- 27. Safeguards are needed to ensure that unanticipated development does not compromise the implementation of spatial plans or the delivery of planned and funded infrastructure. Any responsiveness criteria should also be linked to environmental limits or constraints identified in regional spatial plans, integrated with infrastructure planning and funding processes, and reflect a long-term, strategic approach.
- 28. The Partnership recommends that a key assessment criterion for unanticipated or out of sequence development should be the availability of both infrastructure capacity and funding within the development area and for any additional demand it places on infrastructure beyond the site such as adjustments to public transport routes, upgrades to wastewater treatment plants, or securing additional water allocation for drinking supply. Where development contributes to downstream catchment impacts, including through increased impermeable surfaces, appropriate cost-recovery mechanisms must be in place to avoid shifting the burden onto existing communities or Partnerships.
- 29. Partners would be concerned s if development is enabled where the cost of servicing would place an unreasonable burden on existing communities. Responsiveness should be linked to infrastructure availability, funding mechanisms, and alignment with long-term planning. The system should require clear accountability for funding infrastructure associated with growth, including contributions from developers, and support tools that enable cost recovery and equitable funding arrangements.

- 30. The Partnership highlights the opportunity, through the design of Pillar 2 improvements, to use infrastructure funding and financing tools—such as development levies and value capture mechanisms—to support initiatives like affordable housing and provide Partners with an ongoing revenue stream that is used to support growth. This could include sharing GST from new developments with the Partner Council and mana whenua.
- 31. The design of Pillar 2 tools needs to ensure that the new development levy system can be designed in a way that allows councils to receive revenue in a timely and responsive way, especially if there continues to be the possibility of unplanned growth under the new resource management system.
- 32. In the context of growth paying for growth, the Partnership requests the Government consider including an affordable housing value capture mechanism as part of the new resource management system by ensuring:
  - a. Affordable Housing value capture mechanism be enabled in the new resource management system and legislation.
  - b. The Government makes it easy and cheap for the Partners to activate this mechanism.
  - Parameter settings of the mechanism are determined jointly between Minister and GCP (e.g. percentage contribution, development triggers)
  - d. All money and land generated through this mechanism are to remain exclusively for providing new social or affordable housing owned by Mana Whenua and/or CHPs in the Greater Christchurch sub-region.

These are part of the endorsed approach to Phase 2 actions of the Greater Christchurch Partnership' <u>Joint Housing Action Plan (JHAP)</u>.

- 33. The JHAP identified four significant gaps in the private housing market that need to be addressed:
  - a. Emergency/transitional housing (in May 2024 there are 336 adults and 357 children in Greater Christchurch in emergency housing).
  - b. Social housing (in Sept 2024 there were 2144 households on the MSD waiting list in Christchurch City, 93 in Waimakariri and 63 in Selwyn).
  - Affordable housing rentals and progressive home ownership (in Sept 2024 there were 33,390 people across CCC, Selwyn and Waimakariri receiving the Accommodation Supplement – an increase of nearly 350 people since July 2024)
  - d. Typologies that match the changing demographic demand: the supply-side predominance of 3-4 bedroom homes contribute to the under-utilisation of housing; while in Christchurch, smaller houses are being built but at a price well above the affordability threshold for low income households.
- 34. In additional, there are challenges in the funding and delivery of Māori housing on Māori reserves and urban land.
- 35. Ongoing funding support, affordability and well-located supply (ideally focussed in Greater Christchurch's Priority Areas) are key requirements

- to addressing this private housing market failure in Greater Christchurch.
- 36. To support this, there's a need for the Government to fund its role in providing social and affordable housing. This helps prevent people from falling through the cracks—slipping from private home ownership towards homelessness. The Government's role includes directly providing housing or supporting the Community Housing Provider sector through subsidies and supplements to deliver a mix of social and affordable housing products on its behalf.

## Rural-urban boundaries – Questions 18-20

Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give effect to Cabinet direction to not have rural-urban boundary lines in plans? Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not? What role could spatial planning play in better

enabling urban expansion?

- 37. The new resource management system presents a unique opportunity for it to be designed to support the achievement of desired outcomes, rather than focusing on perceived problems.
- 38. There will always be a delineation between rural and urban land.
- 39. The Partnership considers that spatial planning should play a central role in managing urban expansion by identifying where and when growth should occur, based on infrastructure capacity, environmental constraints (including productive soils), natural hazard risks, and community aspirations.
- 40. While flexibility for expansion is important, encouraging uncoordinated greenfield development can result in additional costs associated with infrastructure, and the loss land for productive activities that support the urban environment e.g. quarrying, horticulture and/or reverse sensitivity effects. It may also undermine the effectiveness of spatial planning, and its ability to align housing, transport, and infrastructure investment.
- 41. Taking the opportunity presented by the Going for Housing Growth Programme in the new system, the Partnership seeks clarification in the Going for Housing Growth Programme of the definitions of 'urban area', 'urban environment' and 'well functioning urban environment', especially the spatial scale it is referencing. These could benefit from greater clarity and provide greater confidence to Partners and certainty to community and developers. The Partnership welcomes the opportunity to work with Government in how this work could be approached in Greater Christchurch and in the broader reginal context.
- 42. The Partnership considers that there may be valid reasons for Partners to include provisions in their planning documents to prevent leapfrogging. From a sub-regional perspective, leapfrogging can create several significant issues:
  - e. Infrastructure and servicing challenges
  - f. Undermining spatial and strategic planning
  - g. Environmental and land use impacts
  - h. Inability to be serviced effectively by public transport

Intensification

Key public transport corridors - Questions 21-23

Do you agree with the proposed definitions for the two categories of 'key public transport corridors? If not, why not?

Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?

Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories?

Minimum building heights to be enabled - Question 25

What are the key barriers to the delivery of four-to-six storey developments at present?

- 43. The Partnership supports the emphasis on targeted intensification around rapid transit routes and key corridors, recognising this approach must be underpinned by integrated transport and land use planning, and supported by investment in public and active transport networks, which have been identified in regional spatial plans (rather than relying on the One Network Framework)
- 44. The Greater Christchurch Spatial Plan prioritises increased intensification along public transport corridors (and key centres), supported by the identification of strategically located priority development areas. This recognises that compact, well-planned urban form is essential for supporting public transport, reducing emissions, and creating liveable, connected communities.
- 45. The targeted intensification along public transport corridors and in key centres is intended to further support the case for investment in public transport service uplifts in the medium-term as a building block towards the nationally significant Mass Rapid Transit System for Greater Christchurch.
- 46. Based on investigations completed as part of Phase 1 of the Greater Christchurch Partnership's Joint Housing Action Plan, the key barriers identified to developments above 4-6 storeys in Greater Christchurch are:
  - a. feasibility less profitable for various reasons
  - b. risk need for more due diligence and greater risks (links to market preference)
  - c. financial harder to get finance and high levels of pre-sales require
  - d. capability developer and construction capabilities in apartments
  - e. Land availability and costs
  - f. Market understanding and maturity (demand side)
- 47. These same barriers apply to developing apartments for affordable housing either as standalone apartment buildings or as part of a mixed tenure development within Greater Christchurch.
- 48. The Partnership notes that incentives may be necessary to support uptake of intensification, especially in areas where expansion pressures could compromise its feasibility.
- 49. With medium and high-density developments already highly enabled across the sub-region's key centres, the Partnership requests that incentives are provided by the Government as part of Pillars 2 and 3 to overcome the identified market barriers identified above to generate greater density in well located and serviced Priority Areas, identified in the Greater Christchurch Spatial Plan.

Transitioning to Phase Three of the RM Reforms – Question 37

Should Tier 1 and 2 councils be required to prepare or review their HBA and FDS in accordance with current NPS-UD requirements ahead

- 50. Understanding infrastructure and urban development capacity is seen as critical in supporting spatial planning.
- 51. The Partnership requests that further consideration and guidance be given to how the housing and business capacity assessments are best done most effectively and the level of detail required to ensure these are aligned with the requirements of the new resource management system, provides certainty to Partners in preparing Long Term Plans, reviewing the Future Development Strategy for Urban Growth

## of 2027 long-term plans? Why or why not?

Partnerships, like Greater Christchurch and the Going for Housing Growth programme's settings of high growth enablement.

Other Feedback on the Programme's proposals and new resource management system – Question 36

Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?

- 52. The Partnership acknowledges the objective of the Going for Housing Growth programme to improve housing affordability by significantly increasing the supply of developable land within and at the edges of urban areas. In addition, the Partnership highlights the importance of enabling a broader range of housing options through the new resource management system to support more diverse and affordable outcomes. Planning frameworks should remain flexible to accommodate a variety of housing typologies that reflect local needs and cultural values.
- 53. Partnerships positions will flex as details on the Programmes pillars and the new system evolve The positions of the Partnership will evolve as subsequent Pillars 2 and 3 and further details on the new system are released by Government. The Partnership reserves the right to evolve and update its position. Particularly as the specifics of Pillar 1 linked to the new resource management system and further details on Pillars 2 and 3 are released by the Government.
- 54. Ongoing involvement by the Partnership in the design of the new resource management is desired This reflects Greater Christchurch being the second largest urban centre in the Aotearoa and recognising the staged approach to the release of Going for Housing Growth Programme and new resource management system, with benefits from the Government having continuity of Urban Growth Partnership involvement and feedback.

#### 5. Summary of the Submission

The Greater Christchurch Partnership welcomes the Government's Going for Housing Growth Programme's focus on enabling more homes and supporting well-functioning communities. This submission seeks to highlight the opportunity for the new resource management system to deliver more integrated and strategic urban development, supported by clear national direction, strong environmental and housing outcomes, and long-term spatial planning that aligns homes, infrastructure, and transport.

The Partnership sees the importance for growth being well-planned, not just fast, and that uncoordinated or leapfrogging developments risk undermining investment and liveability. Within the submission the Partnership seeks ongoing and meaningful engagement with mana whenua, better support for Māori and affordable housing, and new funding tools so the costs of growth don't fall unfairly on our communities. The submission identifies opportunities to clarify national policy definitions to support the rural-urban interface and highlights the importance of enabling intensification in the right places with targeted government support.

#### 6. Beyond the consultation process – Next Steps for Going for Housing Growth Programme

The Greater Christchurch Partnership welcomes ongoing involvement in designing the new resource management system and the remaining Pillars of the Going for Housing Growth Programme, including:

- GCP seeks to remain actively involved in the development of the new system and subsequent programme pillars, building on its established role as an Urban Growth Partnership.
- Leverage existing partnerships and regional leadership to support implementation success and ensure sub-regional priorities are reflected in national reforms.
- Reinforce Greater Christchurch's role as New Zealand's second-largest urban area, unique housing and urban development context that requires tailored, place-based planning and development incentives.

It is also essential that the subsequent development of national policy direction for freshwater management and for urban development are fully aligned to ensure coherent and integrated management of land use, water resources and infrastructure planning.

The Partnership acknowledges its positions may evolve as further detail on Pillars 2 and 3 of the Going for Housing Growth programme and the new resource management system becomes available and the understanding of its impacts on Partners is appreciated.

#### 7. Attachment

• Greater Christchurch Spatial Plan Summary (one-pager)