

Submission Form



Greater Christchurch
Partnership

Te Tira Tū Tahi
One Group, Standing Together

HAVE YOUR SAY BY 30 NOVEMBER 2018

OUR SPACE 2018-2048

Greater Christchurch Settlement Pattern Update
Whakahāngai O Te Hōrapa Nohoanga

How to make a submission

Online: Make a submission using the online submission form at www.greaterchristchurch.org.nz/ourspace

Email: ourspace@greaterchristchurch.org.nz

Post: Our Space consultation, Greater Christchurch Partnership, PO Box 73012, Christchurch 8154

Hand deliver: Civic Offices, 53 Hereford Street

SUBMITTER DETAILS

Name: Dalkeith Holdings Limited

Address: _____

Email: _____

I am completing this submission: For myself On behalf of a group or organisation

If you are representing a group or organisation, how many people do you represent? 1

HEARINGS

Hearings are planned for February 2019.

Do you wish to speak to the hearings panel?

Yes, I wish to speak at the hearings

No, I do not wish to speak at the hearings

If you wish to speak at the hearings, please indicate your preferred location to be heard and provide a contact number.

Preferred location: Christchurch City

Rangiora

Rolleston

Contact number: _____

QUESTIONS

The questions below may help you structure your submission in relation to the various aspects covered in **Our Space 2018-2048**. Section 5.7 of **Our Space** briefly outlines some alternative options considered when preparing this document. You can make submission points under each question and/or other and more general comments under question 9.

Housing growth

Question 1

Our Space highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi.

Do you agree or disagree with this approach and why?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

The submitter generally agrees that further greenfield land around the identified areas is required although notes that it may be more urgently needed than the strategy document suggests. Moreover, in the absence of a clear indication as to the intended policy framework to support the practical release and development of these additional areas, it is difficult to comment further on the appropriateness or otherwise of the approach. In particular, it is not clear as to why these areas are to be identified as "Future Development Areas" rather than "greenfield priority areas" as is currently the case. The submitter is also concerned that the proposal to identify these areas as "Future Development Areas" in the Canterbury Regional Policy Statement, and to leave the detail as to how and when these areas are to be developed to the District Plan review stages, may result in a prolonged shortfall of housing capacity, particularly in Waimakariri where the projected shortfall is greatest.

Among the areas identified for further greenfield development, the submitter strongly supports the approach of selecting those areas which fall within the projected infrastructure boundary and which have been identified for development by the constituent councils. For example, the 'Future Development Area' on the western side of the Rangiora township has been identified for development since the release of Proposed Plan Change 1 to the Regional Policy Statement in 2007. Since that time Waimakariri District Council has developed and published the West Rangiora Structure Plan which sets out the Council's preference for the location and servicing of urban growth, should development of the identified area (which includes the FDA) proceed. Like the draft Update that Structure Plan also has been prepared in consideration of the Council's responsibilities as a service provider and regulatory authority under the RMA, as well as its responsibilities under the Urban Development Strategy. It also provides a framework for integrating development of the area (including the FDA) with the existing Rangiora township. The decision to include the identified area for further greenfield development is therefore consistent with what has been anticipated and planned for in the western side of Rangiora for a number of years. With development now underway/completed to the north and south of the identified area, the "unlocking" of the site for development through amendment to the Regional Policy Statement provides the opportunity to consolidate that development, and complete the delivery of infrastructure to support that urban growth.

Question 2

Our Space adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri.

Do you agree or disagree with this approach and why?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

The submitter generally supports the enabling of a range of housing typologies.

Question 3

Our Space proposes to develop an action plan to increase the supply of social and affordable housing across Greater Christchurch and investigate with housing providers different models to make it easier for people to own their own home.

What elements should be included in this action plan?

N/A

Business growth

Question 4

Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their viability and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri.

Do you agree or disagree with this approach and why? What further measures would support such development?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

N/A

Question 5

The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified sufficient capacity for new industrial businesses.

Do you agree or disagree this is sufficient and in the right location and why?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

N/A

Growth needs

Question 6

The proposals in **Our Space** are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy, including through business sector trends and impacts from technological change.

Do you agree or disagree with our evidence base and why?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

It is noted that the assessment of demand is based on medium to high growth projections from Statistics New Zealand for the Waimakariri District. It is not entirely clear why this projection scenario has been chosen rather than the high growth scenario identified particularly given the growth over the past decade and the expressed intention to be "ahead of the curve". It is submitted consideration might usefully be given to the implications of the high growth projections for this District.

Transport and other infrastructure

Question 7

Our Space promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and an intention to deliver rapid transit along the northern and south-west transport corridors.

Do you agree or disagree with this approach and why?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

N/A

Question 8

Our Space aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities.

Do you agree or disagree with this approach and why? What more could be done to integrate infrastructure planning?

Agree Somewhat agree Neither agree nor disagree Somewhat disagree Do not agree

The submitter supports the approach of aligning development areas with areas that are currently, or can easily be, supported by infrastructure. It supports the identification of additional development areas within the projected infrastructure boundary in the CRPS, and particularly where those areas have also been identified for provision of infrastructure for development within Councils' own planning frameworks (such as structure plans and/or funding).

Other

Question 9

What other points do you wish to make to inform the final Our Space 2018-2048: Greater Christchurch Settlement Pattern Update?

The submitter strongly recommends that the Panel consider how it might enable development of the "future development areas" identified in the draft Update to occur more expediently than what is currently proposed. While it is noted a streamlined process is intended to be used to remove the barrier to development currently within the CRPS, the deferral of decision-making on the nature and timing of the development to the District Plan review stage risks unduly prolonging the identified shortfall in housing capacity over the medium term.

The Draft Update indicates that decisions on the second generation District Plans could be issued in 2022. Given the development of these second generation District Plans is not occurring through a streamlined process (such as the Christchurch Replacement District Plan or Auckland Unitary Plan) and changes to the CRPS are anticipated during the proposed timeframe (which would have implications for both District Plans), the proposed timeframes are, in the submitter's view, highly optimistic. Further, while decisions on the second generation Waimakariri and Selwyn District Plans could be released in 2022, those decisions would be subject to appeal which could add further, considerable delay to their operation. This delay would significantly threaten the ability of the identified Councils to provide sufficient housing capacity as required under the National Policy Statement for Urban Development Capacity.

Given the issues, it is submitted that consideration should be given to whether contemporaneous plan changes should be pursued, amending both the CRPS and the Waimakariri and Selwyn District Plans at the same time. This would ensure that any further delay in the second generation District Plan process would not threaten the ability for the Councils to meet their obligations under the NPSUDC.

Dependent on the rationale for using "future development areas" as opposed to "greenfield priority areas" in the CRPS, consideration might also be given to identifying these areas as "greenfield priority areas" now under the CRPS. This may remove any unnecessary delay that would result from Councils seeking to negotiate the timing of the release of this land.

We require your contact details as part of your submission — it also means we can keep you updated throughout the project. Your submission, name and contact details are given to decision-makers to help them make their decision.

Submissions, identifying submitter names only, will be made available online. If requested, submissions, names and contact details may be made available to the public, as required by the Local Government Official Information and Meetings Act 1987.

If you consider there are compelling reasons why your name and/or feedback should be kept confidential please outline this in your submission.