



Submission on Greater Christchurch Settlement Update – Our Space 2018-2048

Barry Gallagher and David Tipple

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Greater Christchurch Partnership

Submitter Details

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Hearings:

We wish to speak at the hearings.

Preferred location: Christchurch City

Contact number: C/- Aston Consultants Ltd. Contact details as above.

Background and Site

The submitters are Barry Gallagher and David Tipple ('the Submitters'). Barry Gallagher and David Tipple own the following relevant lots which have a combined area of 42.50ha (see quick map attached **Appendix A**).

704 and 726 Hawkins Road: Lot 34 and 35 DP 875

51/55 Quaid's Road: Lots 22 and 23 DP 875

469 Marshland Road: Lot 12 DP875 and Lot 13 DP 875

327 Marshland Road: Lot 15 DP 875

317 Prestons Road: Lot 16 DP 875

305 Prestons Road: Pt Lot 17 DP 875

2 Quaid's Road: Pt Lot 17 DP 875

18 Quaid's Road: Lot 18 DP 875

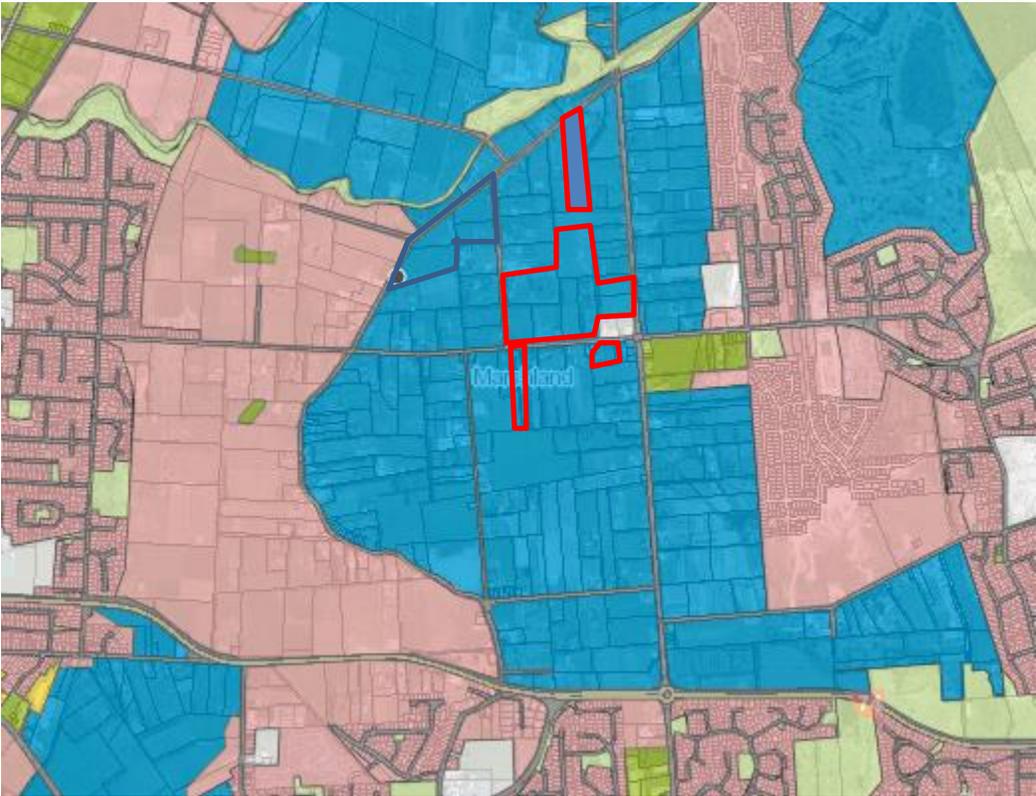
30 Quaid's Road: Lot 19 DP 875 and Lot 1 DP 43239

776 Hawkins Road: Lot 2 DP 305507

328 Prestons Road: Pt Lot 50 DP 875

290 Prestons Road: Pt Lot 1 DP 51167

The Gallagher and Tipple properties are located between the Highfields and Prestons residential subdivisions at north east Christchurch. Highfields is located west of Hawkins Road and remains undeveloped south of Prestons Road. North of Prestons Road development includes a new retirement village and a Suburban Estates subdivision is underway. Prestons is largely developed and located east of Marshlands Road. The Gallagher and Tipple land is within an area of remaining rural zoned land between these subdivisions bounded by QEII Drive to the south and Hawkins Road and Lower Styx Road to the north as shown on the Canterbury Maps planning map below. The area is characterised by 4 ha and smaller titles which are for the most part used for rural lifestyle purposes, being too small for any realistic economic farming use.



-  Residential Zone
-  Rural Zone
-  Approximate location of Tipple properties

 Approximate location of Gallagher properties

The Gallagher and Tipple land and potentially other land between Prestons and Highfields is an ideal location for lower density residential subdivision – for example in the 1000-3000m² size range. There is an ongoing demand for sections in this size range, located close to the services of the city but large enough to accommodate a generous sized home and garden area, for example for families wanting open space for childrens' play or others wanting a good sized garden area.

The requirement for a minimum density of 15 households per ha for Greenfield Priority Areas effectively precludes the ability to provide any sections in 1000-3000m² size range. There is no zoning in this size range in Christchurch City or Greater Christchurch - other than, for Christchurch City, the Residential Large Lot Zone on limited areas on the Port Hills, and very minor areas where physical ground conditions dictate lower densities e.g. Residential Suburban Heathcote Village peat overlay area, and some Small Settlement areas on Banks Peninsula.

The only provision for lower density living in the current Canterbury Regional Policy Statement (CRPS) is rural residential areas, as provided for by territorial authorities in accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 2002 (Policy 6.3.7). Rural residential is defined as residential units outside the identified Greenfield Priority Areas at an average density of between 1 and 2 households per hectare. There are very limited areas of zoned rural residential development in Greater Christchurch. The consequence is that those wanting larger residential lots are forced to purchase 4 ha lots which are in more ready supply, or where available rural residential lots in the 5000m²-1ha size range i.e. more land than they need or want. This is a waste of rural land with owners having the ongoing challenge of maintaining the land which is surplus to requirements.

Housing Development Capacity Assessments

Our Space acknowledges that its housing capacity work is uncertain, in particular assessment of the commercial feasibility of development, and that work is required to improve the modelling tools used. There is considered to be ample capacity to meet demand, even in the long term, within Christchurch City. However, the focus is on responding to the anticipated demand for more smaller household living options and provision of affordable housing, principally medium and high density housing close to public transport and existing services and facilities. This overlooks the fact that there needs to be a choice of living options, including provision for those whose wanting

larger sections. With the growing trend towards self sufficiency, resilience and sustainable, healthy living, there is also a move towards home grown food – which needs land. The Housing Capacity Assessments simply ‘overlook’ this sector of the housing market altogether.

Our Space also recognizes that a responsive planning approach is required given the many uncertainties associated with the primary drivers and influencers of urban development in Greater Christchurch.

Relief Sought:

1. Amend Fig 16: Proposed locations of future development areas in Greater Christchurch by as follows:-

- Identify the submitters’ land and other land as appropriate between the Highfields and Prestons subdivisions and bounded by QEII Drive to the south and Hawkins Road and Lower Styx Road to the north as Greenfield Priority Area – Large Lot Residential, defined as lots within the 1000-3000m² size range; and potentially identify other parts of Greater Christchurch as appropriate for Large Lot Residential development; or for other residential zoning.

2. 6.2 Schedule of future work

Amend 8 (page 34) as follows:-

Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:-

- address any the need for housing development capacity for large lot residential subdivision as identified in this submission and including the Submitters’ land, including by amending Map A to be consistent with the other relief sought in this submission (including 1. above and 3. below); and

- provide flexibility to accommodate meritorious proposals for urban development and zoning and to facilitate a responsive planning approach by amending and adding to the objectives and policies as follows (insertions in bold and underlined):-

Add new Policy 6.3.1A as below:-

Policy 6.3.1 A

(a) Enable urban development or zoning outside the Greenfield Priority, Special Housing Areas and Existing Urban Areas shown on Map A provided the following conditions are met:-

(i) Any additional land is contiguous with a Greenfield Priority Area, Special Housing area, or Existing Urban Area; and

(ii) Any additional land will integrate with the provision of infrastructure; and

(iii) Any additional land is a logical addition to the urban area and will contribute to a consolidated urban form; and

(iv) The beneficial planning outcomes for the urban development or extension outweigh any disbenefits arising from increasing the land available for urban development; and

(v) All of the criteria in Policy 6.3.11 (5)(a) to (g) inclusive are met.

Explanation:

This policy confirms the requirement for urban development to be contained within Greenfield Priority, Special Housing and Existing Urban Areas but provides some flexibility to accommodate meritorious proposals and to facilitate a responsive planning approach given the uncertainties associated with the housing and business land capacity assessments which have informed Map A, and the primary drivers and influencers of urban development in Greater Christchurch.

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:....

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS **or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;**

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly

provided for in the CRPS or which has minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;

6.3.7 Residential location, yield and intensification

In relation to residential development opportunities in Greater Christchurch:

7. Subject to Policy 5.3.4, residential greenfield priority area development shall occur **generally** in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.

3. Specify in **Our Space** that Fig 16 be included in District Plans rather than the Canterbury Regional Policy, thus facilitating the ability for private plan requests for changes to the same, with appropriate criteria for assessment being included in the CRPS and/or District Plans; or as a less preferred alternative, other methods to retain flexibility and 'future proofing' to respond to meritorious housing and business development proposals which give effect to the NPS-UDC but are not recognized or provided for in **Our Space** and supporting documents.
4. Consider other amendments to the CRPS and other documents and actions which are appropriate to facilitate a responsive approach to urban growth management for Greater Christchurch.
5. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitters' land and potentially other meritorious minor rural/urban boundary changes, and associated policy wording. Do not use streamlined processes for implementation of the overall **Our Space** strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.
6. Such other consequential, additional or other amendments to Chapter 6 of the RPS and other documents, and any other actions, to be consistent with and give effect to the intent of this submission, including directing consequential amendment to the Christchurch District Plan and other District Plans to re-zone the Submitters' land and other such land as appropriate Large Lot Residential, suggested lot size range 1000-3000m² or other

residential zoning.

Reasons for Relief Sought:-

1. For the reasons set out above under and under the responses to the Submission Form questions below.
2. The housing and business development capacity targets, urban form outcomes, and Schedule of Future Work measures (including change to the CRPS) contained in **Our Space** will have a profound and defining effect on the Greater Christchurch settlement pattern for the next 30 years. There will be very significant flow on effects for the local, regional and potentially national economies. There is no s32 assessment accompanying **Our Space** despite its defining role in 'dictating' the urban growth approach for Greater Christchurch for the next 30 years.
3. The amendments sought will enable the owners of the Submitters' land and of other land as identified above to use the land in the most appropriate, effective and efficient way which will achieve the purpose of the Resource Management Act 1991 (the Act).
4. **Our Space** as notified proposes an urban growth management approach, in particular as it affects the Submitters' land, which is inconsistent with and does not give effect to the Act, including Part 2 and Section 32, and other relevant statutory and non statutory matters.
5. The **Our Space** development capacity targets are uncertain and likely to be inaccurate and are based on a flawed methodology. In particular they completely overlook the need to provide for large lot residential living opportunities, in the 1000-3000m² size range.
6. **Our Space** considers a responsive planning approach is necessary but does not facilitate this whereas this submission does.
7. **Our Space** as notified is contrary to and does not give effect to the National Policy Statement – Urban Development Capacity (NPS – UDC) in particular Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points. No housing capacity supply is provided for Large Lot Residential sections despite a very very limited supply and strong demand throughout Greater Christchurch non urban areas.
8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by **Our Space** is unlikely to facilitate the urban form sought by **Our Space** including for the following reasons:-
 - Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a very negative effect on housing affordability;

- A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than “land bank” (because there is excessive capital gain due to scarcity of land supply);
- Containment and higher land values does not facilitate intensification;
- If the Central City and the Key Activity Centres are attractive the market will locate there by people’s choice. Generally carrots are better than sticks to achieve desired planning outcomes.
- A contestable urban/rural boundary is not ‘laissez-faire’ and ad hoc and will not result in uncontained urban sprawl. The proposed amendments to Our Space and other planning documents require strategic planning including with respect to infrastructure, and an evidence base in support of any amendments to the boundary;
- A policy of both “up and out” with a range of section sizes and housing types that ensures there are a range of development opportunities and housing choices is appropriate.

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 with this approach and why?

Response:

No – there needs to be provision for some large lot residential living – the ideal location is the Submitters’ land and neighbouring land for the reasons outlined above.

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 with this approach and why?

Response:

No - provision needs to be made for Large Lot Residential subdivision in appropriate locations, including the Submitters' land.

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 the different models to make it easier for people to buy their own home.

What elements should be included in this action plan?

Response:

No comment.

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 flexibility and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri.

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

Response:

No comment.

Question 5:

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

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

Response:

No comment.

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 this evidence base and why?

Response:

See comments above re Capacity Assessment.

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 in intention to deliver rapid transit along the northern and south-west transport corridors.

Do you agree or disagree with this approach and why?

Response:

No comment, other than to note the area between the Prestons and Highfield subdivisions can benefit from the existing and new services planned in this part of the City, including the new senior school on the QEII pool site.

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?

Response:

No comment, other than it is noted that there are no known infrastructure constraints which preclude the Large Lot Residential development in the wider Highfields/Prestons locality including the Submitters' land.

Other

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

Response:

No further comments other than as noted above.

Appendices

Appendix A: Quick map

Appendix A
Quick Map

