Before the Greater Christchurch Partnership

In the Matter	of the Local Government Act 2002
And	
In the Matter	of a submission by GFR Rhodes Estate and Larson and Marshall Group on the Greater Christchurch Settlement Update – Our Space 2018-2048

Evidence of Adam Jeffery Thompson

Dated 20 February 2019

Introduction

1. My full name is Adam Jeffrey Thompson. I am the Director of Urban Economics Limited. I hold a Bachelor of Resource Studies from Lincoln University (1998), a Master of Planning from Auckland University (2000) and a Dissertation in Urban Economics from the London School of Economics (2014). I have studied urban economics at Auckland University and environmental economics at Lincoln University.

2. I have 16 years' experience as an Urban Economist and have owned and managed two consulting firms that have provided services in these fields. I have undertaken over 600 economic and property market assessments for a range of private and public sector clients.

3. I was one of the two main developers of the Auckland Council Developable Capacity Model, which informed land supply for the Auckland Unitary Plan review.

4. I record that I have read and agree to abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2014. This evidence is within my area of expertise, except where I state that I rely upon the evidence of other expert witness as presented to this hearing. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

Summary

5. My evidence provides an economic assessment of a residential zoning for a group of parcels of land in Prebbleton, referred to as the Rhodes & Larson Group blocks (the "proposal").

6. The main points to note are:
    - The main towns in Selwyn District, namely Prebbleton, Rolleston and Lincoln, are planned to enable 60% of the Districts overall 'housing growth target' under the Our Space document.

- Based on my analysis, across these three towns:
    - Prebbleton has an insufficient capacity presently and requires additional land immediately to meet its housing target,
    - Rolleston has sufficient Greenfield Priority Area (GPA) land until 2025. In order to make it through the next decade, some additional Future Growth Area (FGA) land will need to be released and available to the market for development within 3 years, and
    - Lincoln has sufficient GPA land to meet demand until 2036.
- In summary, there is an immediate need for additional land in two of the three main towns in Selwyn District. This land is required to ensure the housing targets are met and that there is an efficient housing market over the next decade.
- For the long term, out to 2048, there is insufficient capacity to meet the housing targets within these three main towns.

7. These same conclusions are reached in the Our Space document for Selwyn District, which is estimated to have a shortfall of 7,575 dwellings by 2048, and only a minor surplus by 2028 of 1,125 dwellings (page 13, Table 3). It should be noted that the Our Space document's sufficiency estimates do not include a 'supply buffer', which is recommended. For example, the Auckland Unitary Plan requires a minimum seven year supply buffer to be maintained at all times in the future (i.e. through the life of the Plan). The NPS-UDC also supports a supply buffer by requiring ten years supply to be available at all times in the future.

8. This proposal would enable in the order of 450 dwellings, on lots ranging from 300m^2 to 600m^2 in size.

9. This small lots sizes would enable lot prices of $160,000 - $250,000 and dwelling prices of $350,000 - $500,000.

10. At present only 1% of dwellings are priced below $400,000, and only 25% of dwellings are priced below $600,000, in Prebbleton.

11. The Prebbleton Structure Plan (2010) estimates demand for an additional 630 dwellings in Prebbleton over the next decade. This estimate is significantly lower than the recent construction trends, which indicate demand for an additional 1,500 dwellings in Prebbleton over the next decade. However, the Our Space document allocates a 'housing growth target' of around 60 dwellings per annum for Prebbleton, and this rate of growth is adopted for this analysis.

12. Prebbleton has a large number of small lifestyle blocks on its periphery. These have a higher value than large rural blocks and are more difficult to develop due to price and site aggregation.

13. Prebbleton has only two feasible opportunities remaining for new residential development on its periphery, one being the Rhodes and Larson property. It should also be noted that larger properties enable high quality masterplanned developments which tend to have a better design and housing price outcome.

14. Prebbleton has commercially feasible capacity, that is practically available over the next decade, of around 10 additional infill dwellings and 90 greenfield dwellings (100 in total). Only 40 of these would be priced below $400,000.

15. In Prebbleton only 1% of dwellings are priced at $400,000 or less. Under the current District Plan provisions, only 7% of dwellings would be priced at $400,000 or less, as at 2028. By contrast, under the proposal, there is potential for a significant 20% of dwellings being priced at $400,000 or less, as at 2028. Therefore, the proposal helps meet the target of 35% of houses being "affordable" (defined as being under $350,000 to purchase) in the Selwyn District as per the Our Space strategy (page 11).

16. The availability of lower priced housing would have a wide range of social and economic benefits, most notably there would be more diversity in the housing stock, in terms of size and price, and this would enable more households to meet their housing needs.

17. It is worth noting that Lincoln and Rolleston have a higher proportion of housing available in the $400,000 - $600,000 price range, which is more affordable, and also has a notable percentage of housing available in the $400,000 or less price ranges (in the order of 10-15%). The proposal would bring Prebbleton more in line with the housing available in these other two townships. This would have important social and economic benefits, for example an elderly household looking to downsize their house would currently have little opportunity to do this in Prebbleton.

18. Prebbleton is located in close proximity to the Riccarton industrial area, which is planned to expand substantially. This close proximity to employment would be attractive to future residents in Prebbleton and would also have some notable transportations efficiencies.

19. In respect of the adverse and positive economic effects, overall, the proposal is recommended for inclusion in the Our Space strategy as an area for urban development.

Greater Christchurch Housing Market Overview

20. Christchurch is the only major city in New Zealand that is currently able to build any notable amount of affordable housing, and it is been doing this successfully for over 100 years. When combined with high personal incomes, it gives Christchurch a comparative advantage over the other major cities that supports strong population and business growth.

21. The following figure shows the low average lot price across the region. It is of significant important to note that **in Waimakariri and Selwyn Districts, the average lot price is around $200,000, and a substantial 63%-67% of all new lots are brought to the market for less than $150,000**. By comparison, all other cities have an average lot price of $400,000 - $700,000 and practically no lots available for less than $150,000.

22. The Our Space document states that "…an increasing number of households will face affordability pressures in either renting or owning their home..."

(page 15). In my opinion there is no reason to expect Christchurch to have any future housing affordability issues, given its good track record and providing it ensures an adequate pipeline of both greenfield and redevelopment/intensification capacity by implementing an appropriate planning regime (refer to evidence of Ms Aston) .

Figure 1: Average New Lot Price in NZ Major Cities ($000)

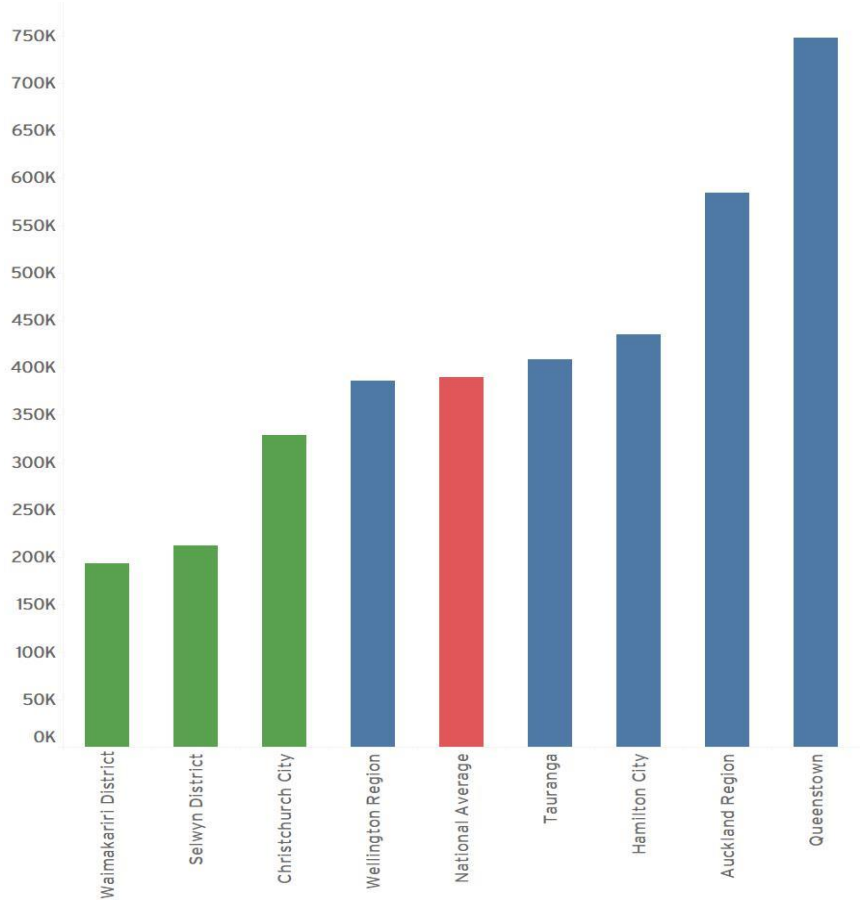
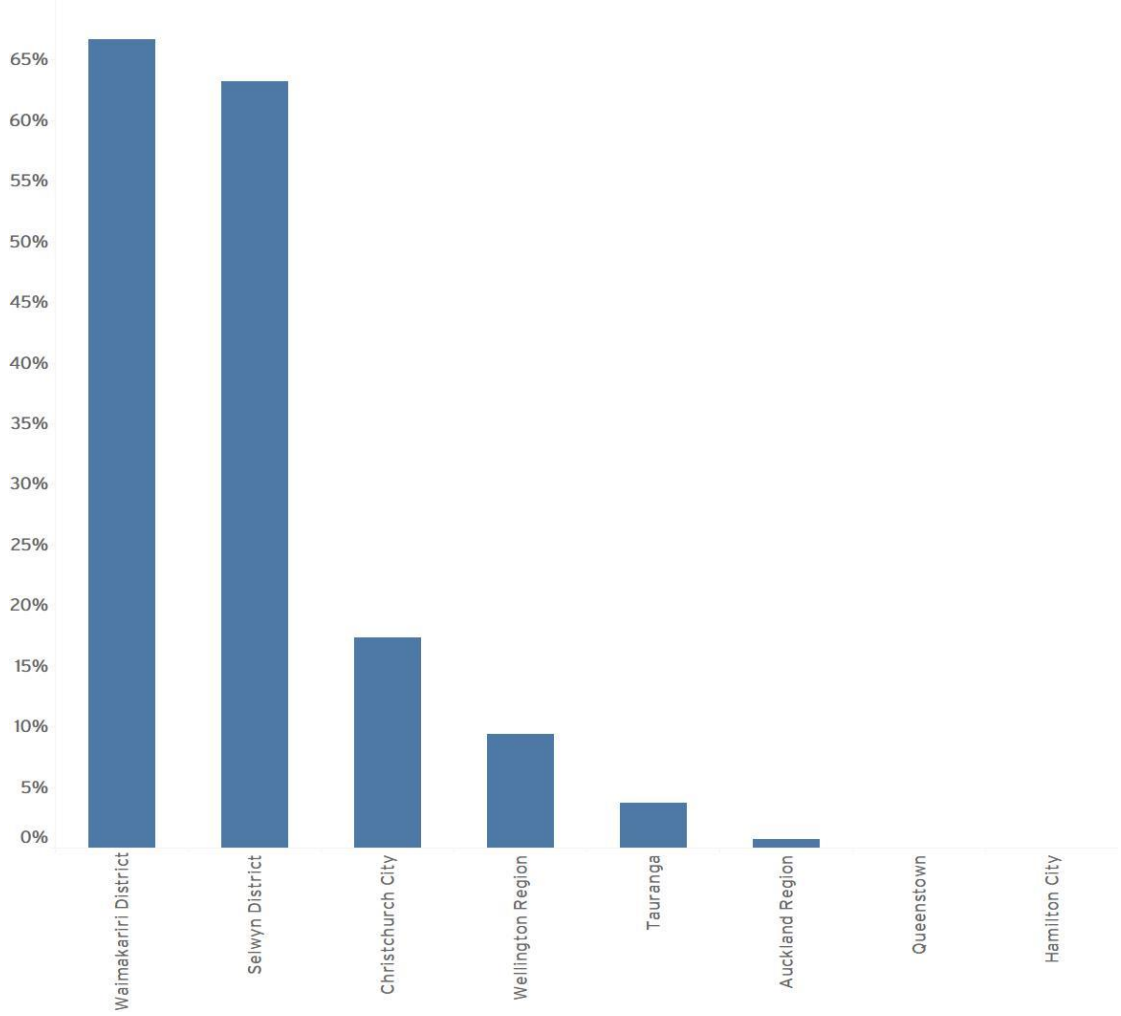


Figure 2: Percentage of New Lots for Sale for Less than $200,000



23. The Our Space strategy sets a housing growth target for 65% of new housing to be built in Christchurch City, 20% to be built in Selwyn District, and 15% to be built in Waimakariri District. My evidence only evaluates whether Selwyn Districts has sufficient capacity to accommodate 20% of future demand, and equally importantly, whether housing will continue to be affordable in Selwyn over the next decade and beyond.

24. The Our Space strategy sets a 'housing target' for Selwyn Districts of 17,290 dwellings over the 2018-2048 period.

25. The analysis in the following section aims to meet the housing targets for Waimakariri and Selwyn Districts, and is therefore in line with the Our Space document.

Capacity and Housing Targets

26. This section evaluates whether there is sufficient capacity to meet the housing targets set for Selwyn District, both in terms of the quantity of houses that can be built and ensuring that housing remains affordable over the next decade.

27. A detailed evaluation is provided of the main townships, including Prebbleton, Rolleston and Lincoln.

28. The approach of the evaluation is straight forward. The Greenfield Priority Areas (GPAs) are assessed for each township in terms the quantity of undeveloped land that remains. Similarly, the Future Growth Areas (FGAs) are assessed for each township in terms of quantity of land. From here, an average yield of 12 dwellings per hectare (gross) is applied to determine the quantity of houses that can be built.

29. On the demand side, the 'housing targets' for each township are estimated by applying the historic distribution of growth within each District, using Building Consents. This enables the Housing Target for Selwyn District (17,290 dwellings) to be achieved, in line with the Our Space document.

30. The last step is to compare the quantity of houses that can be built with the forecast housing targets. If the number of dwellings that can be built falls short of the growth target, then the new construction will not meet the housing targets for this part of the City and issues such as housing affordability will arise.

31. There is also a need to provide for a 'supply buffer'. This ensures that the future supply pipeline does not run dry, and in particular that there is at any one time at least seven years of potential supply available to meet the growth targets. In my opinion, a 7-year buffer is the minimum to ensure an efficient housing market, and as a benchmark, the Auckland Unitary Plan has a policy of requiring a minimum of 7 years' supply (of live zoned and serviced land) but created sufficient greenfield capacity inside the rural urban boundary for

up to 30 years (of 'future urban' land that is released over time). I also note that he NPS-UDC requires a 10-year supply buffer and it is intended for the Our Space strategy to give effect to the NPS-UDC.

32. The underlying reason for an adequate buffer is that otherwise there is a strong commercial incentive for land owners to "landbank", or continue farming, and this can mean that areas identified for new housing are simply not developed. If an owner can benefit from strong annual capital gain (due to planning regulations that overly restrict land supply), without the investment and risk of development, the land can sit idle, reducing the supply of houses and adversely affecting affordability. However, having a 7-year supply buffer of live zoned land, that is, or can be, readily serviced, substantially reduces the risk of land banking behaviour[1].

Prebbleton

33. The following figures show the capacity for new dwellings in Prebbleton. This is then compared with the forecast 'housing growth targets', or demand, as outlined in the Our Space strategy. The main points to note are:

- There are three Greenfield Priority Areas (GPAs). In total there are 30 hectares of undeveloped GPA land with potential for 340 dwellings.
- Accounting for a 7 year 'supply buffer', there is presently demand for 480 dwellings. This is forecast to increase to 2,220 dwellings by 2048.
- Under the GPA scenario, there is sufficient capacity out to 2019. Beyond this time the 7-year supply buffer will start to be eroded and this will mean demand will not be met and prices will start to increase as participants in the "market" perceive a scarcity of development opportunities.

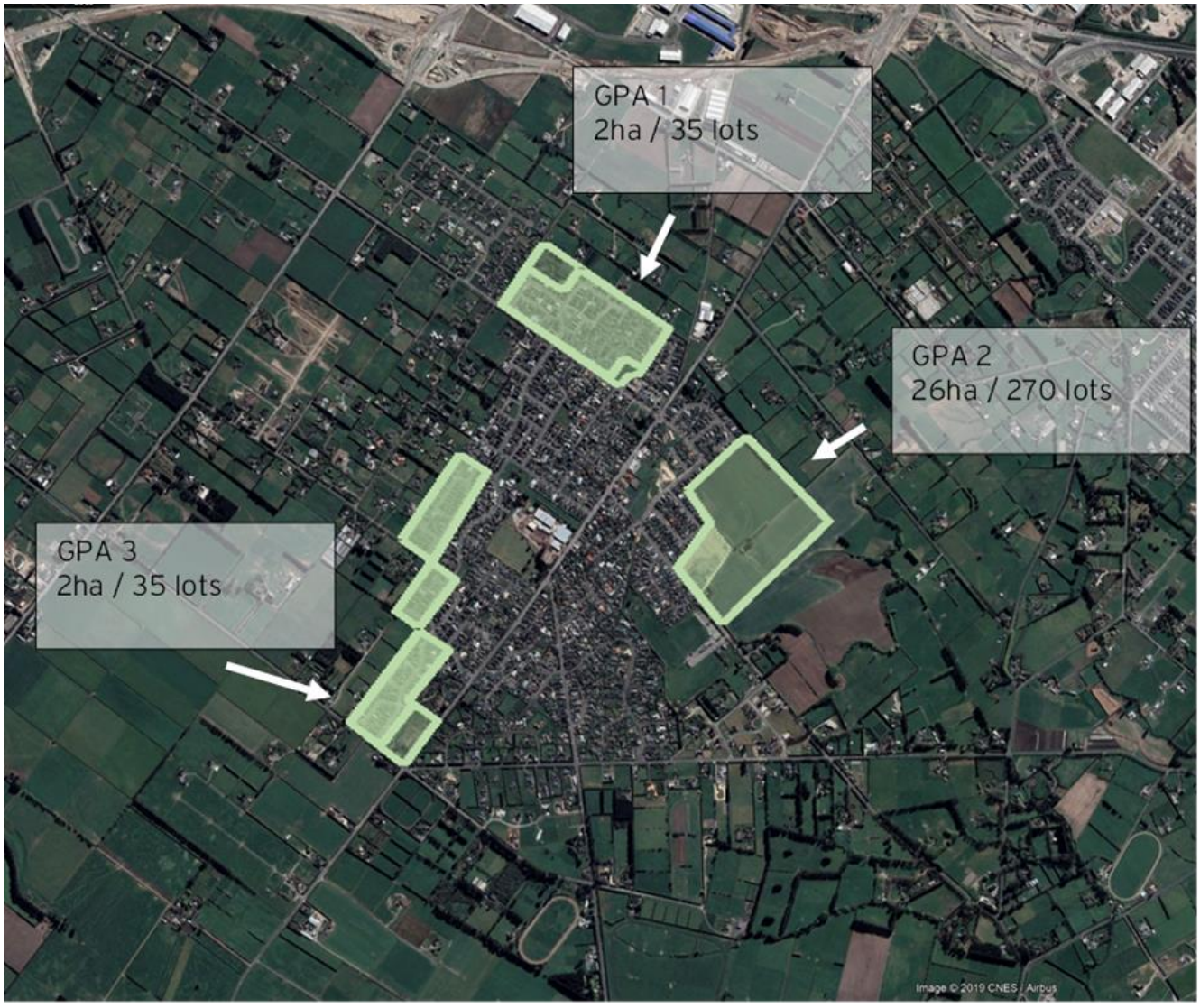
34. In conclusion, if only the GPA land is released to the market, then Prebbleton

[1] A study by Grimes and Liang (2009) found that the Auckland MUL has had a significant impact on land prices in the city, with the price of land just inside the MUL around 10 times higher than land just outside the MUL. It is therefore important to enable a sufficient quantity of land. (Grimes, A. & Liang, Y. (2009), Spatial determinants of land prices in Auckland: Does the Metropolitan Urban Limit have an effect? Applied Spatial Analysis and Policy, 2:1, 23-45).

will not have sufficient supply to keep pace with the Our Space growth targets. Based on historical actual growth rates the supply shortfall will be even higher. The consequence will be a rapid increase in house prices and a decrease in affordability which appears to be contrary to the affordability targets in the Our Space strategy. By contrast, if both the GPA and FDA land is released to the market, then Prebbleton can expect to have enough supply to keep pace with the Our Space growth targets, and perhaps more importantly, more affordable houses will be built in Prebbleton over the next decade.

35. The following figure shows the GPA and FDA undeveloped land and the lot (dwelling) yields that are possible, based on 12 dwellings per hectare.

Figure 3: Prebbleton GPA & FDA Land Supply Analysis



36. The following figure quantifies the total GPA development land and potential lot/dwelling yield.

Figure 4: Prebbleton GPA & FDA Land Supply Analysis

Development Area	Undeveloped Land (ha)	Total Dwellings
GPA 1	2	35
GPA 2	26	270
GPA 3	2	34
GPA Sub-Total	**30**	**339**
Grand Total	**30**	**339**

Source: Urban Economics

37. The following figure shows the years for which there is sufficient capacity for a robust housing market (in green) and the years for which there is an insufficient capacity for a robust housing market (in orange). In this case, Prebbleton has insufficient land from 2019 (so is only coloured orange).

Figure 5: Prebbleton Land Sufficiency Analysis 2019-2048

Year	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Annual Demand	60	120	180	240	300	360	420	480	540	600	660	720	780	840	900
Supply Buffer	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420
Annual Demand incl. Supply Buffer	**480**	**540**	**600**	**660**	**720**	**780**	**840**	**900**	**960**	**1020**	**1080**	**1140**	**1200**	**1260**	**1320**
GPA	339	339	339	339	339	339	339	339	339	339	339	339	339	339	339

Year	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048
Annual Demand	960	1020	1080	1140	1200	1260	1320	1380	1440	1500	1560	1620	1680	1740	1800
Supply Buffer	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420
Annual Demand incl. Supply Buffer	**1380**	**1440**	**1500**	**1560**	**1620**	**1680**	**1740**	**1800**	**1860**	**1920**	**1980**	**2040**	**2100**	**2160**	**2220**
GPA	339	339	339	339	339	339	339	339	339	339	339	339	339	339	339

Source: Urban Economics

Lincoln

38. The following figures show the capacity for new dwellings in Lincoln. This is then compared with the forecast 'growth targets' or demand as outlined in the Our Space strategy. The main points to note are:

- There are two Greenfield Priority Areas (GPAs). In total there are 200 hectares of undeveloped GPA land with potential for 2400 dwellings.

- Accounting for a 7 year 'supply buffer', there is present demand for 768 dwellings. This is forecast to increase to 3,552 dwellings by 2048.
- There is annual demand for 96 dwellings in Lincoln. This is below the historic rate of growth (157 dwellings p.a.) which accounts for the strategic direction in Our Space to accommodate 20% of regional growth in Selwyn District.
- Under the GPA scenario, there is sufficient capacity out to 2036. Beyond this time the 7 year supply buffer will start to be eroded and this will mean demand is not met and prices will start to increase.

39. In conclusion, if the GPA land is released to the market, then Lincoln will have sufficient supply to keep pace with the Our Space growth targets until 2036, however it will not have sufficient land to enable growth over the full period, from 2018-2048. If additional land is not provided before 2036 then the consequence will be a rapid increase in house prices and a decrease in affordability.

40. The following figure shows the GPA undeveloped land and the lot (dwelling) yields that are possible, based on 12 dwellings per hectare.

Figure 6: Lincoln GPA & FDA Land Supply Analysis

41. The following figure quantifies the total GPA developmental and potential lot/dwelling yield.

Figure 2: Lincoln GPA & FDA Land Supply Analysis

Development Area	Undeveloped Land (ha)	Total Dwellings
GPA 1	150	1800
GPA 2	50	600
GPA Sub-Total	**200**	**2400**
Grand Total	**200**	**2400**

Source: Urban Economics

42. The following figure shows the years for which there is sufficient capacity for a robust housing market (in green) and the years for which there is an insufficient capacity for a robust housing market (in orange).

43. Figure 7: Lincoln Land Sufficiency Analysis 2019-2048

Year	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Annual Demand	96	192	288	384	480	576	672	768	864	960	1056	1152	1248	1344	1440
Supply Buffer	672	672	672	672	672	672	672	672	672	672	672	672	672	672	672
Annual Demand incl. Supply Buffer	**768**	**864**	**960**	**1056**	**1152**	**1248**	**1344**	**1440**	**1536**	**1632**	**1728**	**1824**	**1920**	**2016**	**2112**
GPA	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400

Year	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048
Annual Demand	1536	1632	1728	1824	1920	2016	2112	2208	2304	2400	2496	2592	2688	2784	2880
Supply Buffer	672	672	672	672	672	672	672	672	672	672	672	672	672	672	672
Annual Demand incl. Supply Buffer	**2208**	**2304**	**2400**	**2496**	**2592**	**2688**	**2784**	**2880**	**2976**	**3072**	**3168**	**3264**	**3360**	**3456**	**3552**
GPA	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400

Source: Urban Economics

Rolleston

44. The following figures show the capacity for new dwellings in Rolleston. This is then compared with the forecast 'growth targets' or demand as outlined in the Our Space strategy. The main points to note are:

45. There are eight Greenfield Priority Areas (GPAs) including the two Special Housing Areas (SHAs). In total there are 227 hectares of undeveloped GPA land with potential for 2,716 dwellings.

- There are three Future Development Areas (FDAs). In total there are 274 hectares of undeveloped FDA land with potential for 3,288 dwellings.
- Accounting for a 7 year 'supply buffer', there is present demand for 1504 dwellings. This is forecast to increase to 6,956 dwellings by 2048.
- There is an assumed annual demand for 188 dwellings in Rolleston. This is below the historic rate of growth (306 dwellings p.a.) which accounts for the strategic direction in Our Space to accommodate 35% of regional growth in Selwyn and Waimakariri District.
- Under the GPA scenario, there is sufficient capacity in Rolleston out to 2025. Beyond this time the 7 year supply buffer will start to be eroded and this will mean demand is not met and prices start to increase.
- Under the GPA plus FDA scenario, there is sufficient capacity out to 2045. This will ensure a strong and robust housing market with

affordable houses for the next twenty-five-year period.

46. In conclusion, if only the GPA land is released to the market, then Rolleston will not have sufficient supply to keep pace with the Our Space growth targets. The consequence will be a rapid increase in house prices and a decrease in affordability. By contrast, if both the GPA and FDA land is released to the market, then Rolleston can expect to have enough supply to keep pace with the Our Space growth targets, and perhaps more importantly, Rolleston will continue to see affordable houses being built over the next decade.

47. The following figure shows the GPA and FDA undeveloped land and the lot (dwelling) yields that are possible, based on 12 dwellings per hectare.

Figure 8: Rolleston GPA & FDA Land Supply Analysis

48. The following figure quantifies the total GPA and FDA development land and potential lot/dwelling yield.

Figure 3: Rolleston GPA & FDA Land Supply Analysis

Development Area	Undeveloped Land (ha)	Total Dwellings
GPA 1	3	35
GPA 2	1	15
GPA 3	48	570
GPA 4	68	820
GPA 5	57	680
GPA 6	7	85
SHA 1	38	452
SHA 2	5	59
GPA Sub-Total	**227**	**2716**
FDA 1	197	2364
FDA 2	77	924
FDA 3	145	1740
FDA Sub-Total	**274**	**3288**
Grand Total	**501**	**6004**

Source: Urban Economics

49. The following figure shows the years for which there is sufficient capacity for a robust housing market (in green) and the years for which there is an insufficient capacity for a robust housing market (in orange). This is done for both the GPA and 'GPA plus FDA' scenarios (the 'GPA plus FDA' scenario assumes that all of this land is made available immediately).

Figure 9: Rolleston Land Sufficiency Analysis 2019-2048

Year	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Annual Demand	188	376	564	752	940	1128	1316	1504	1692	1880	2068	2256	2444	2632	2820
Supply Buffer	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316
Annual Demand incl. Supply Buffer	**1504**	**1692**	**1880**	**2068**	**2256**	**2444**	**2632**	**2820**	**3008**	**3196**	**3384**	**3572**	**3760**	**3948**	**4136**
GPA	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716
GPA plus FDA	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004
Year	**2034**	**2035**	**2036**	**2037**	**2038**	**2039**	**2040**	**2041**	**2042**	**2043**	**2044**	**2045**	**2046**	**2047**	**2048**
Annual Demand	3008	3196	3384	3572	3760	3948	4136	4324	4512	4700	4888	5076	5264	5452	5640
Supply Buffer	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316	1316
Annual Demand incl. Supply Buffer	**4324**	**4512**	**4700**	**4888**	**5076**	**5264**	**5452**	**5640**	**5828**	**6016**	**6204**	**6392**	**6580**	**6768**	**6956**
GPA	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716	2716
GPA plus FDA	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004	6004

Source: Urban Economics

Selwyn District Summary

50. The previous sections analysed the main towns in Selwyn District, namely Prebbleton, Rolleston and Lincoln.

51. Together these towns account for 60% of the District's overall housing growth target (i.e. 60% of growth over the next 30 years is anticipated to occur in these towns).

52. The main conclusions are as follows:

- Prebbleton has an insufficient capacity presently and requires additional urban zoned land immediately to meet its housing target.
- Rolleston has sufficient GPA land until 2025. In order to make it through the next decade, with an efficient and affordable housing market, some additional FGA land will need to be released and available to the market for development within 3 years.
- Lincoln has sufficient GPA land to meet demand until 2036.

53. Overall, there is an immediate need for additional land in two of the three main towns in Selwyn District. This land is required to ensure the housing targets are met and that there is an efficient housing market over the next decade. It will also help ensure the availability of a range of housing choices, at different price points, and the affordable housing created will enable people to provide for their social and economic wellbeing, and health and safety.

54. For the long term, out to 2048, there is insufficient capacity to meet the housing targets within these three main towns.

55. These same conclusions are also reached in the Our Space document, which shows a shortfall of 7,575 dwellings by 2048, and only a minor surplus by 2028 of 1,125 dwellings (page 13, Table 3). It should be noted that the Our Space document's sufficiency estimates do not include a supply buffer, which is essential to avoid incentivising land banking behaviour. For example, the Auckland Unitary Plan requires a minimum of seven years of urban zoned land

to maintain a supply buffer at all times in the future (i.e. through the life of the plan). The NPS-UDC also supports a supply buffer by requiring ten years supply to be available at all times in the future.

The Proposal

56. This report is in support of a submission on 'Our Space 2018-2048; Greater Christchurch Settlement Update' ('GCSU') seeking Greenfield Priority Area – Residential status for the Suburban Estates Limited properties at West Prebbleton. I understand that achieving an actual live zoning is outside the scope of this process, but I support the Our Space strategy recommending this part of Prebbleton for urban use, so that it is rezoned in the pending district plan review (Ms Aston planning evidence).

57. The proposal is to apply the equivalent of the Lincoln Living Z zone to the Rhodes and Larson properties but with greater provision for medium density housing. The LZ zone at Lincoln requires a minimum average lot size of 600m^2, other than in medium density housing areas identified on an Outline Development Plan. For these areas, Medium Density (Comprehensive) development requires a maximum lot size of 350m^2, and Medium Density (Small Lot) development, a minimum lot size of 400m^2 and maximum average of 500m^2.

58. I understand that the Selwyn District Plan is under review so the current zonings may change. I understand that a Medium Density Residential Zone is proposed around Key Activity Centres and Neighbourhood Centres in various townships, but not at Prebbleton. The majority of residential areas will be zoned General Residential Zone which enables low density suburban residential development.

59. A Living Z zone is proposed which makes greater provision for medium density housing which is 'midway' between comprehensive and small lot medium density i.e. average lot size of 350m^2, with a minimum or 300m^2 and a maximum of 400m^2. Houses in this size range can be 'stand alone' or duplex and single storey. These lot sizes would enable the construction of dwellings

in the $350,000 - $450,000 price range, making it attractive to first home buyers, households on low to middle incomes, and empty nesters and retirees that would like to trade down to a smaller more affordable dwelling. Facilitating "ageing in place", by providing a diversity of housing choice, can promote a more efficient utilisation of the housing stock overall.

60. By comparison, the majority of dwellings in Prebbleton are priced in the $500,000 - $800,000 price range and cater to wealthier households and households on a higher income. Such barriers to entry for lower income households appears to me to be inconsistent with the "equity" principle/goal on page 5 of the Our Space strategy. It is also contrary to "fostering an equitable planning approach across our communities", and the increasing disparity that is emerging between the Eastern (increasingly disadvantaged), and Western (increasingly privileged) parts, of the Greater Christchurch Partnership area (Our Space page 16).

61. It is suggested that an appropriate mix could range between 300m^2 and 600m^2**.** This would enable in the order of 450 lots.

Existing Land Uses

62. Prebbleton and its immediate 1-2km rural surrounds is comprised of:
    - 30 rural properties comprising 550 hectares (25%)
    - 450 lifestyle block properties comprising 1,350 hectares (65%)
    - 1500 residential properties comprising 150 hectares (10%)

63. The main points to note are:
    - Prebbleton is therefore dominated by lifestyle blocks, which account for two thirds of all land use.
    - There are very few remaining rural properties, in the order of 30.
    - The residential area accounts for 150 hectares.

Housing Market Profile

64. The following figure shows the residential lot size and price. This has been determined with a regression analysis that achieved an R^2 of 0.45 indicating a strong correlation between lot size and price.

65. The following figure shows the prices of the existing dwellings in Prebbleton. This is illustrated in Figure 11. The main points to note are:

- Only 1% of dwellings are priced below $400,000.
- Only 25% of dwellings are priced below $600,000.
- The majority, three quarters, of dwellings are priced at $600,000 or more.

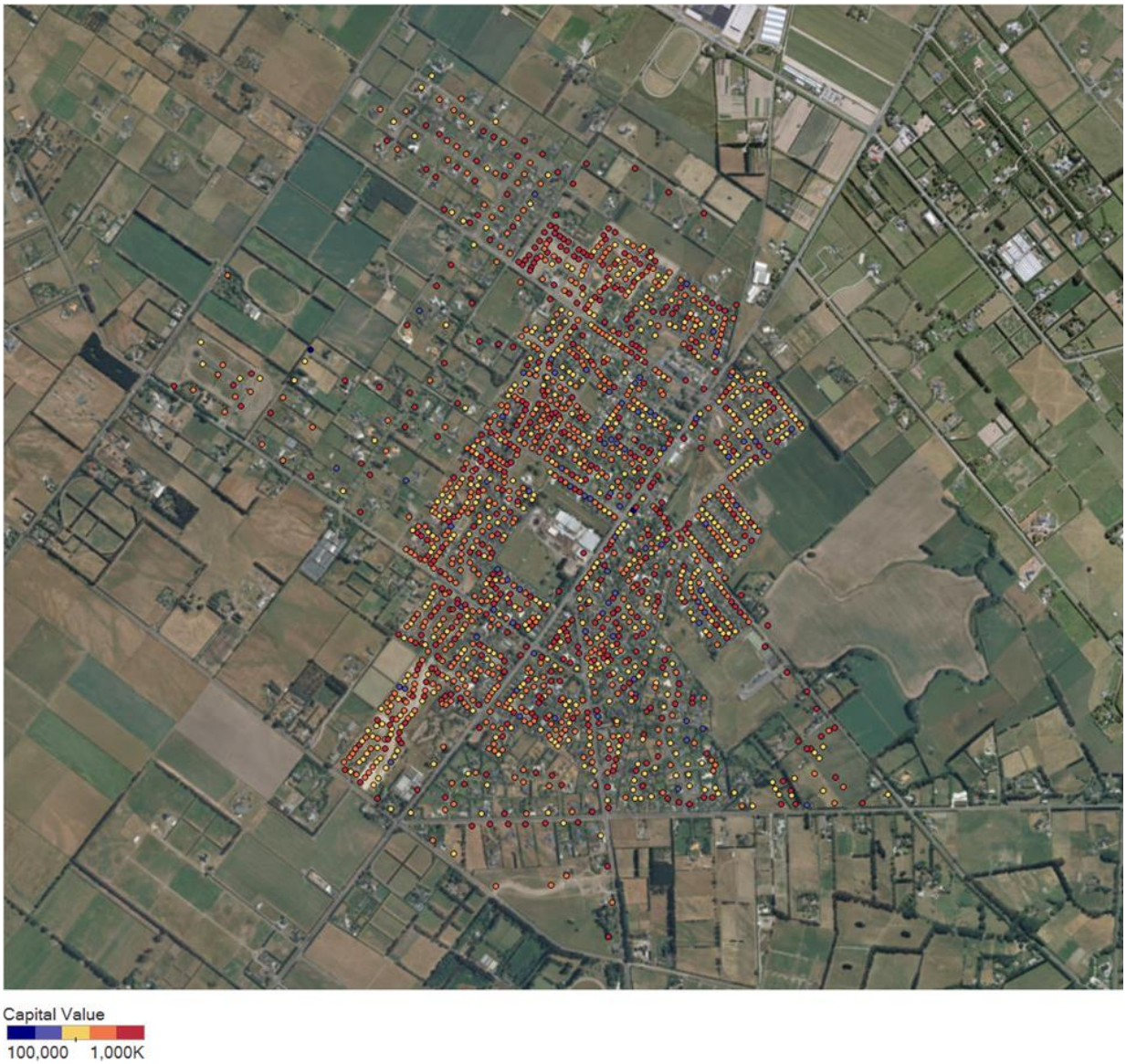
Figure 10: Prebbleton Residential Lot Size and Price

Price Ranges	Count	Percentage
Under 200k	7	0%
200k-400k	21	1%
400k-600k	467	24%
600k-800k	824	42%
800k-1m	326	17%
1m+	324	16%
Total	**1969**	**100%**

Source: Corelogic, Urban Economics

66. Figure 11 shows the distribution of dwellings by price. This shows an even distribution of prices across the town, i.e. that there are not notable 'prime' and 'less attractive' localities within the town.

Figure 11: Prebbleton Dwelling Price Map



Urban and Rural Lifestyle Housing Demand at Prebbleton

67. The Prebbleton Structure Plan (dated February 2010 i.e. pre-earthquake) estimates that 630 additional households will reside in Prebbleton over the next decade. This indicates an underlying demand for around 60 new dwellings each year.

68. Over the past decade Prebbleton has seen strong growth, with around 100 dwellings built annually based on Building Consent data. Over the past five years this has increased markedly to 150-200 dwellings per annum. This indicates that the demand for housing is approximately 2-3 times that

estimated in the Prebbleton Structure Plan, of only 60 dwellings per annum.

69. It should be noted that in Section 3 an annual 'housing growth target' of 60 dwellings per annum is adopted, rather than the total market demand (this is coincidentally the same as the estimated Structure Plan rate of growth).

Figure 12: Prebbleton Residential Building Consents 2008-2018

Year	Number of Dwellings
2008	60
2009	70
2010	40
2011	20
2012	80
2013	180
2014	130
2015	140
2016	180
2017	110
Total	**1,010**

Source: Statistics NZ

Prebbleton Development Opportunities & Constraints

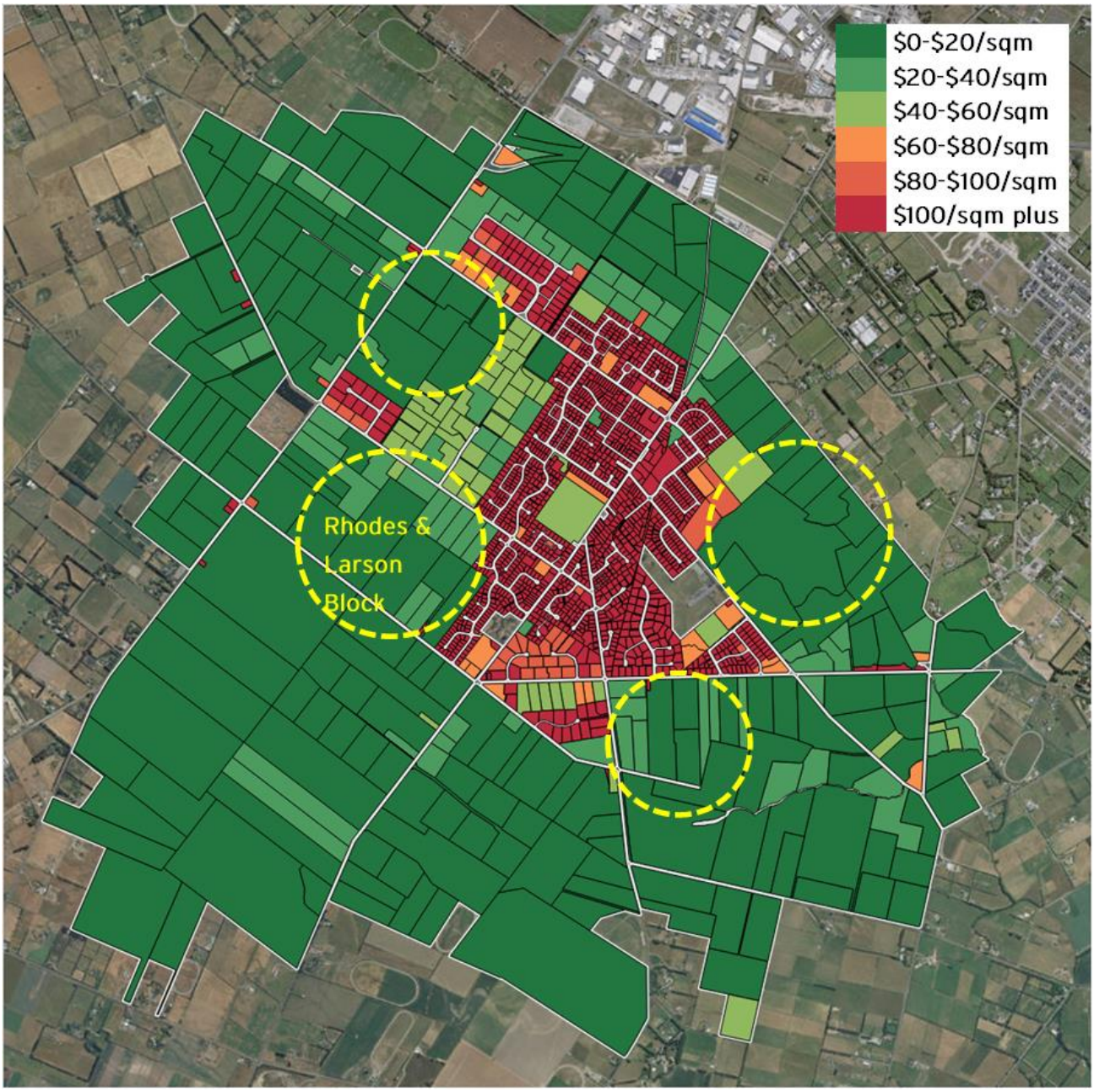
70. Figure 13 shows the land value, on per sqm basis, for all properties in Prebbleton. This is calculated as the total land value divided by the property area in sqms. This is a useful tool for evaluating the redevelopment potential of land, as higher land values are a constraint on development, as they increase the cost for a developer, and often mean that a new development is not commercially feasible.

71. The main points to note are:

- There are a significant number of lifestyle blocks that surround the main urban area. These lifestyle blocks generally have a value of $50+ per sqm.
- There are only a small number of locations adjacent to the main urban area that have land values, of less than $50 per sqm, that would enable new urban developments. These are identified in yellow.
- It is evident that Prebbleton has very little remaining opportunity for

new residential growth that is commercially feasible.

Figure 13: Land Value per Sqm



Source: Selwyn District Council, Corelogic, Urban Economics

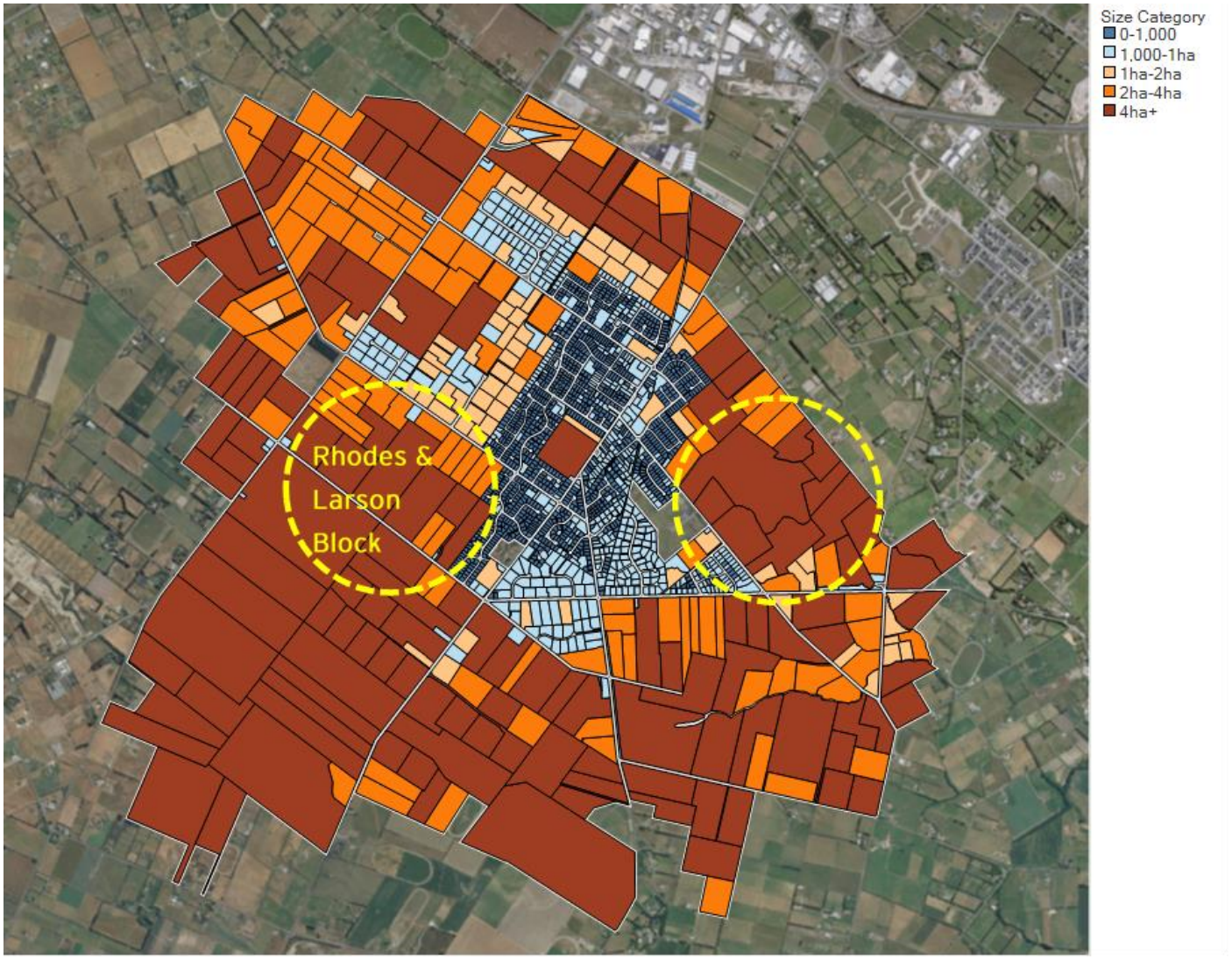
72. Figure 14 shows the land area of each parcel in Prebbleton. The main points to note here are:

73. A large part of the Prebbleton Urban area is bordered by Lifestyle Blocks of 1-2 hectares. This provides a de facto greenbelt for much of the town, as it is practically and commercially difficult to develop these properties into smaller

residential properties (unless these blocks have been 'future proofed' on a comprehensive basis for future potential urban development).

74. The areas identified in yellow show that there are only two apparent feasible expansion locations for the town that do not require development to leapfrog an area of lifestyle blocks. These are the most efficient locations for new development as they integrate directly with the existing urban area. The Rhodes & Larson site is one of these locations and based on this preliminary analysis, is one of the two optimal locations for new housing in Prebbleton.

Figure 14: Land Area (Per Property)



Source: Corelogic, Urban Economics

Commercially Feasible Infill Capacity

75. Figure 15 shows the estimated 'plan enabled' and 'commercially feasible' lots and dwellings by lot size and price for Prebbleton. The results are illustrated in Figure 16. The key points to note are:

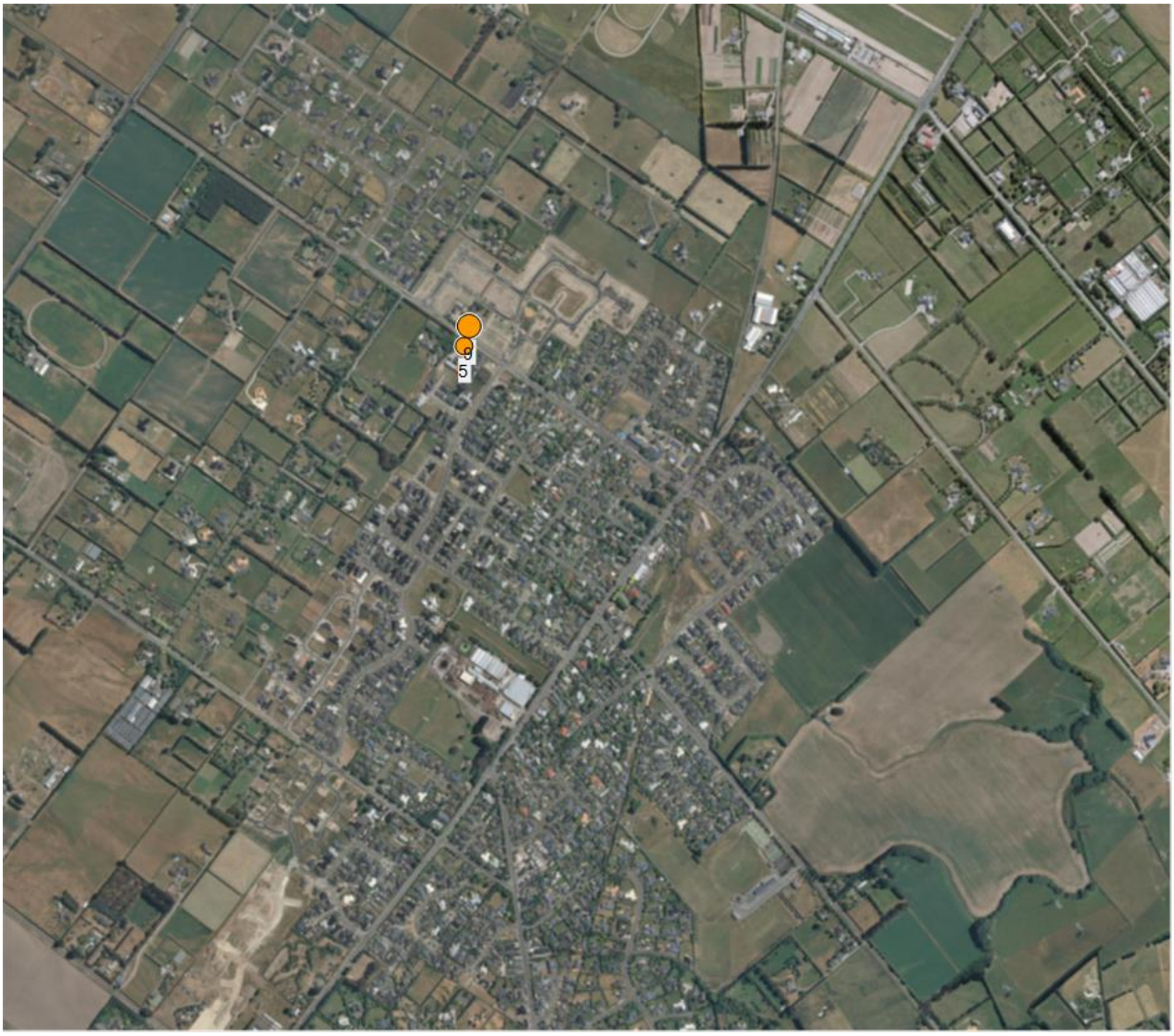
- In total, there is potential for 14 commercially feasible infill dwellings in Prebbleton. As some of these properties would not be available for development, as the owners would not sell these properties over the next decade, this would imply that there is practical potential for around 10 additional infill dwellings over the next decade.
- There are a range of lot sizes that are possible under the District Plan, ranging, in broad terms, from 400m^2 to 8,000m^2.
- These lots would be priced between $190,000 and $590,000.
- The dwellings that are likely to be built on these lots would result in a property value of $380,000 to $1.18 million. All of the potential infill dwellings however, would be priced between $500,000 to $600,000.

Figure 4: Plan Enabled & Commercially Feasible Infill Lots by Lot Price

Lot Size	Lot Price	Dwelling Price	Feasible Dwellings	Feasible Dwellings %
400	$190,000	$380,000	9	64%
700	$270,000	$540,000	5	36%
800	$290,000	$580,000	0	0%
5000	$530,000	$1,060,000	0	0%
8000	$590,000	$1,180,000	0	0%
Total			14	100%

Source: Corelogic, Urban Economics

Figure 5: Commercially Feasible Infill Lots by Lot Price



Source: Corelogic Database, Urban Economics

Greenfield Land Capacity

76. Figure 17 shows the estimated greenfield potential dwellings, by lot size and price for Prebbleton. The results are illustrated in Figure 18. The key points to note are:

- In total, there is potential for 182 greenfield dwellings in Prebbleton. As some of these properties would not be available for development, as the owners would not sell these properties over the next decade, this would imply that there is practical potential for around 130

additional greenfield dwellings over the next decade.

- There are a range of lot sizes that are possible under the District Plan, ranging, in broad terms, from 400m^2 to 8,000m^2.
- These lots would be priced between $190,000 and $590,000.
- The dwellings that are likely to be built on these lots would result in a property value of $380,000 to $1.18 million.

Figure 17: Greenfield Land Capacity

Lot Size	Lot Price	Dwelling Price	Feasible Dwellings	Feasible Dwellings %
400	$190,000	$380,000	69	38%
700	$270,000	$540,000	113	62%
800	$290,000	$580,000	0	0%
5000	$530,000	$1,060,000	0	0%
8000	$590,000	$1,180,000	0	0%
Total			**182**	**100%**

Source: Corelogic, Urban Economics

Figure 18: Greenfield Land Capacity

Source: Corelogic Database, Urban Economics

Development Yield from the Rhodes & Larson Site

77. The proposal would enable the development of approximately 450 dwellings, on sites of 300m2 - 600m^2. This would enable lots priced in the $160,000 - $250,000 price range and dwellings in the $350,000 - $500,000 price range.

Potential Future Housing at Prebbleton by Price & Type

78. The following figures examine three future housing scenarios for Prebbleton.

79. The first is the Existing Stock scenario (the status quo). Under this scenario only 1% of dwellings are priced at $400,000 or less.

80. The second is the Existing Stock plus Commercially Feasible Capacity scenario. This is the scenario that would eventuate under the current District Plan provisions, which has some capacity for additional housing development. Under this scenario only 7% of dwellings would be priced at $400,000 or less, as at 2028 (in 2018 prices, i.e. inflation adjusted).

81. The third is the Existing Stock plus Commercially Feasible Capacity plus Rhodes & Larson Site scenario. This is the scenario that would occur is the proposal zone is applied to the subject property. Under this scenario a significant 20% of dwellings would be priced at $400,000 or less, as at 2028. This would have a wide range of social and economic benefits, most notable there would be more diversity in the housing stock, in terms of size and price, and this would enable more households to meet their housing needs.

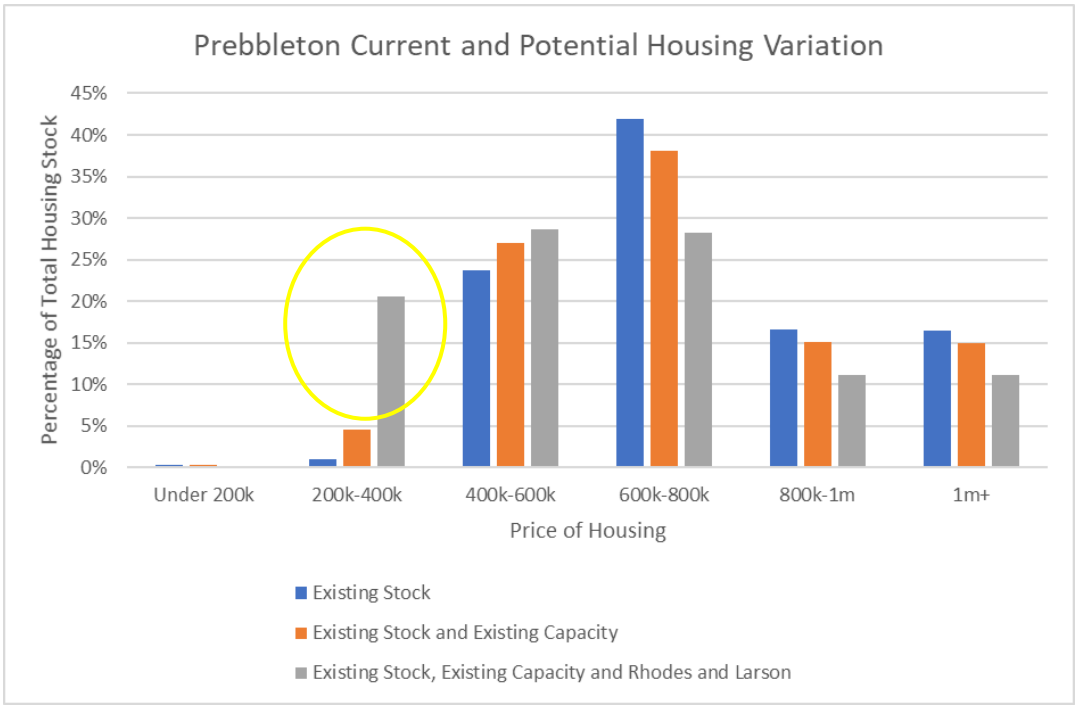
Figure 22: Future Housing Scenarios for Prebbleton

Future Scenario	Total Dwellings	Total Dwellings %
Existing Stock		
Less than $200,000	7	0%
$200,000-$400,000	21	1%
$400,000-$600,000	467	24%
$600,000-$800,000	824	42%
$800,000-$1,000,000	326	17%
$1,000,000 plus	324	16%
Total	**1969**	**100%**
Existing Stock plus Commercially Feasible Capacity		
Less than $200,000	7	0%
$200,000-$400,000	99	5%
$400,000-$600,000	585	27%
$600,000-$800,000	824	38%
$800,000-$1,000,000	326	15%
$1,000,000 plus	324	15%
Total	**2165**	**100%**
Existing Stock plus Commercially Feasible Capacity plus Rhodes & Larson Site		
Less than $200,000	7	0%
$200,000-$400,000	599	21%
$400,000-$600,000	835	29%
$600,000-$800,000	824	28%
$800,000-$1,000,000	326	11%
$1,000,000 plus	324	11%
Total	**2915**	**100%**

Source: Corelogic, Urban Economics

82. Figure 20 provides a graphical representation of the three scenarios. It is worth noting the significant increase in housing priced at under $400,000 under the proposal, as highlighted in yellow.

Figure 20: Future Housing Scenarios for Prebbleton



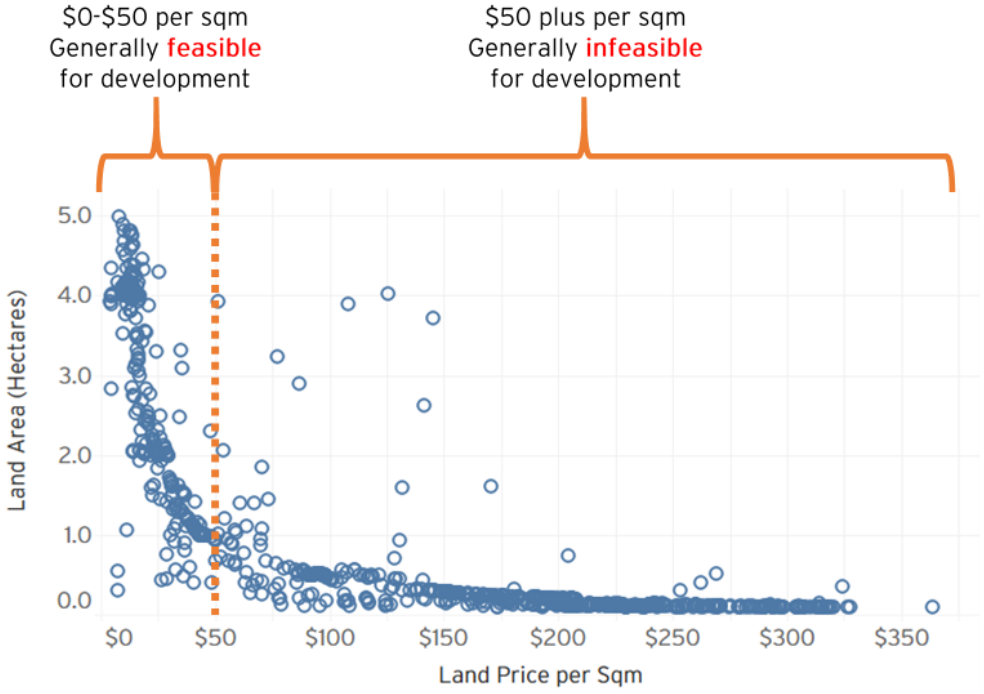
Lifestyle Block Redevelopment

83. The following regression analysis illustrates that in Prebbleton, only sites that are 1-2 hectares or greater in size have commercial potential for new development, i.e. lots below 1 hectare tend to be too expensive for redevelopment. This suggests that the majority of Lifestyle Blocks would not be suitable for development.

84. The present proposal for the Rhodes block, for small Lifestyle Block size sites (it is identified as a preferred rural residential development in the Council's Rural Residential Strategy 2014), would effectively prohibit any future urban development, and would contribute to the de facto greenbelt at Prebbleton. This would remove any future potential to expand the town to the south/west in the future (beyond the Larson Group land). We understand that it has been suggested that the Rhodes block be 'future proofed' for future urban development, but on this basis, future urban development would likely occur in an organic manner 'over time' depending on the aspirations of individual rural residential block holders.

85. My recommendation that this opportunity for urban development is recognised now, as part of this process, and while the raw land is still in large holdings and would therefore be efficient to develop. The land can be developed for rural resident use under the current zonings and if the owners, for circumstances within their prerogative, undertook such development it would significantly compromise the ability to urbanise in the future. This would not be an efficient use of this well-located "urban" land resource in my opinion.

Figure 21: Land Value & Lot Size Correlation

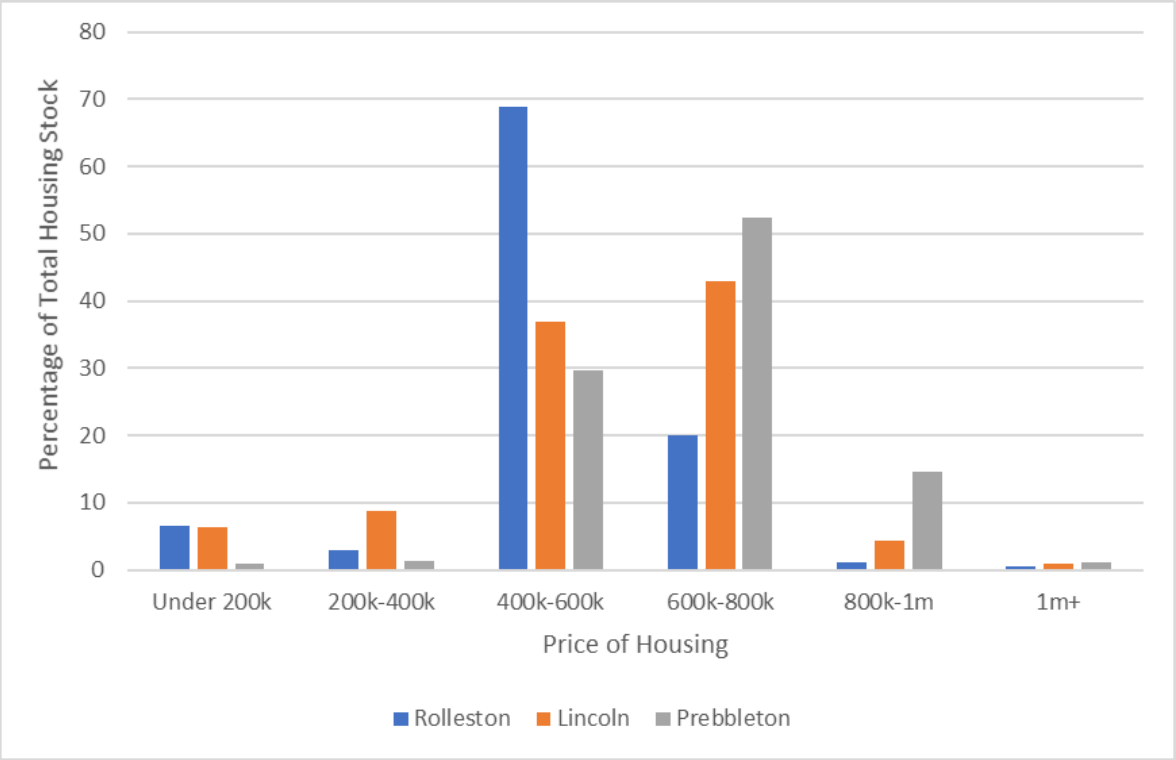


Comparison with the Housing at Rolleston and Lincoln

86. The following figure shows the price of housing in Rolleston and Lincoln and compares it with Prebbleton. The main points to note are:

- Prebbleton (in grey) is dominated by higher priced housing, the $600,000 - $800,000 range, and has practically no housing at $400,000 or less.
- Lincoln and Rolleston have a higher proportion of housing available in the $400,000 - $600,000 price range, which is more affordable, and also has a notable percentage of housing available in the $400,000 or less price ranges (in the order of 10-15%).
- Prebbleton has a much narrower range of house prices when compared to Lincoln and Rolleston. This lack of lower priced housing has significant economic and social implications, particularly in regard to the availability of a range of housing types and the availability of affordable housing, meaning Prebbleton residents are less able to meet their housing needs. For example, an elderly household looking to downsize their house would have little opportunity to do this in Prebbleton.

Figure 22: Rolleston, Lincoln and Prebbleton Current Housing Stock by Price



Auckland Infill Terrace Housing Market

87. It is worth noting that the Auckland housing market has aimed at increased intensification, with the Auckland Unitary Plan ("AUP") allowing infill terrace housing, and in some cases apartments, across many existing suburbs. Under the AUP, the price of new infill housing in existing suburbs has continued to increase, with Council's current estimate that the average price of new housing in the City is $1.5 million. It is worth noting that the majority of terrace housing has occurred in large scale masterplanned greenfield developments on the urban periphery. This is because such developments are able to generally avoid opposition from neighbours and carefully plan high density housing to achieve well designed urban environments. Also importantly, large greenfield developers are generally able to access the finance to develop this type of housing more readily than small-medium scale infill developers (e.g. developers building 3-5 infill houses on an existing quarter acre property in a central suburb).

88. The main implication of this pattern for Prebbleton is that for the town to

achieve any notable amount of more intensive and lower priced housing, is also likely to require a large masterplanned development, such as that which could be enabled on the Rhodes & Larson site. This is particularly important, because Prebbleton is now of a scale that can support a small supermarket, and one is presently planned, and small self-contained towns of this size should enable a diverse range of housing, in terms of size, type and price.

Maori Home Ownership Decline

89. In 2013, around one in three Maori households owned their own house in Christchurch, a drop of 29% since 2001. It would be interesting to analyse the data from the most recent census when it is available. The ongoing provision of affordable housing in Selwyn is possible, but only if there is sufficient land supply, for the reasons outlined in this evidence. If housing is not affordable in the future, Maori home ownership is likely to continue to decline, because lower socio-economic groups are disproportionately affected by high house (and rental) prices (refer to targets on page 11 of the Our Space strategy).

_____

Adam Jeffrey Thompson

Date: 20 February 2019

Appendix 1: Lot Size and Lot Value Correlation

90. The following figure shows the estimated lot price for a range of lot sizes in Prebbleton. This is derived from a regression analysis, which had a r2 of 80%, indicating a very strong correlation.

Figure 26: Lot Size and Lot Price Correlation for Prebbleton

Lot Size (sqm)	Lot Value	Count	Percentage
300	$160,000	16	1%
400	$190,000	24	2%
500	$220,000	57	4%
600	$250,000	202	14%
700	$270,000	310	22%
800	$290,000	392	28%
900	$300,000	91	7%
1000	$310,000	130	9%
1100	$330,000	44	3%
1200	$340,000	67	5%
1300	$350,000	16	1%
1400	$360,000	8	1%
1500	$370,000	6	0%
1600	$380,000	3	0%
1700	$380,000	7	1%
1800	$390,000	3	0%
1900	$400,000	9	1%
2000	$410,000	9	1%

Source: Corelogic, Urban Economics

BEFORE THE GREATER CHRISTCHURCH PARTNERSHIP

IN THE MATTER of the Local Government Act 2002

AND

IN THE MATTER of a submission by GFR Rhodes Estate, Larson and Marshall on the Greater Christchurch Settlement Update – Our Space 2018-2048

EVIDENCE – FIONA ASTON

1.0 Introduction

1.1 My name is Fiona Aston (MA Cambridge University, England, M.Phil Town Planning, University College London, MNZPI, MRMLA). I have 34 years resource management and planning experience. I am Principal and Director of Aston Consultants Resource Management and Planning (Aston), and have operated my own consultancy practice, based in Christchurch, since 1995.

1.2 I work extensively in the Greater Christchurch area, with numerous clients with interests in subdivision, land development and land use planning matters. I am very familiar with the Urban Development Strategy (UDS), Christchurch District Plan (CDP), Chapter 6 (C6) of the Canterbury Regional Policy Statement (CRPS) and the planning history relating to these documents. This includes Plan Change 1 (PC1) and Chapter 12A of the RPS (C12A), the Land Use Recovery Plan (LURP) and Christchurch Replacement District Plan (CRDP). I have advised and prepared evidence and submissions on behalf of clients on all of these documents.

1.3 The GFR Rhodes Estate trustees, representatives for the Larson Group and Suburban Estates have asked me to provide planning evidence in relation to their submission on the Greater Christchurch Settlement Update 2018 -2048 (hereafter referred to as 'Our Space'). Suburban Estates have an interest in the two of larger Larson Group blocks, with a combined total of 15.5 ha.

1.4 My evidence is essentially two parts. The first part is specific to Prebbleton and outlines the submitters' development proposal, and the need for and benefits of enabling further housing development capacity at Prebbleton. The second part addresses Our Space as a whole and assesses it against the National Policy Statement – Urban Development Capacity, which it must give effect to.

2.0 Background – Submitters & Site

2.1 The GFR Rhodes Estate ('the Estate') own approximately 22ha of land. The land is zoned Rural Inner Plains and is located between Hamptons and Blakes Road west of the current Prebbleton Living zone boundary. It is identified in the Selwyn District Rural Residential Strategy 2014 (RRS) as Preferred Rural Residential Area 7. Rural residential development is required to be 'future proofed' to enable future intensification to urban densities because the site is within the Prebbleton *"*Preferred Urban Form*"* growth path identified in the RRS (as shown in **Appendix C)**.

2.2 The Estate has not proceeded with rural residential rezoning because their preference is urban subdivision because it would be a more efficient use of the land, and they recognise that there is very little remaining undeveloped living zoned land at Prebbleton. Selwyn District Council (SDC) officers have informally noted their reservations regarding proceeding with rural residential development, notwithstanding future proofing. They are concerned that it will be harder to facilitate subsequent urban development if there are multiple landowners with small titles. In the meantime the Estate remains 'in limbo'. Trent Road Developments Ltd, the company owned by the late Gerald Rhodes, submitted on the RRS in late 2013, 5 ½ years ago.

2.3 Larson and Marshall own land between the Rhodes land and the current Prebbleton urban boundary as shown on the location plan below (with a combined area of 15.5ha)**.** They did not seek rural residential status under the RRS because of their proximity to the current urban boundary and their location within the 'Preferred Urban Form' area for Prebbleton.

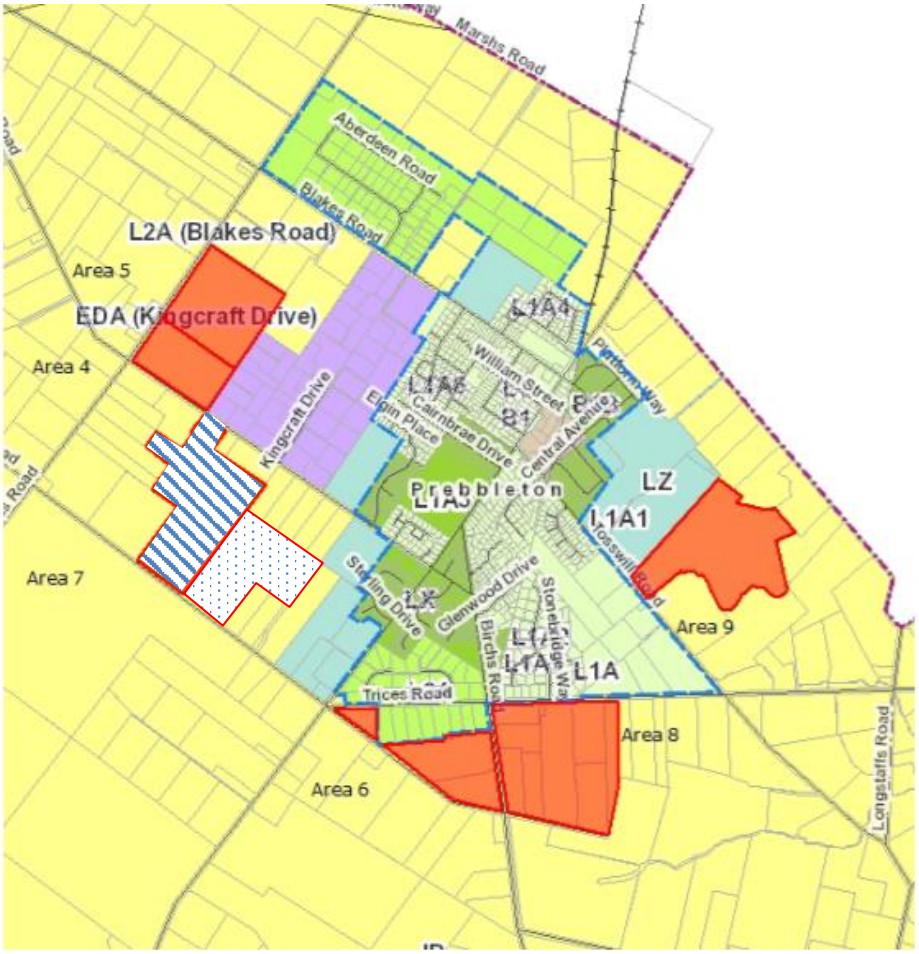


Fig 1: Location Plan

Rhodes Estate land - striped, Larson/Marshall land - dots

2.4 The Estate and Larson and Marshall are collaborating and working together on the rezoning issues affecting their respective lands. They propose a form of living zoning for their land which will provide for a greater diversity of housing at Prebbleton, including some smaller more affordable housing on smaller sites in the 300-500m^2 size range, as well as section sizes in the 500-600m^2 size range. They anticipate a dwelling density of around 12 households per ha.

3.0 Development Proposal

3.1 Under the current Prebbleton District Plan zoning there is virtually no provision for smaller medium density housing at Prebbleton. The average section size in the 'standard' Living Z zone is 700m^2 with a minimum lot size of 550m^2. There are no medium density areas, other than one small area shown in darker yellow on Outline Development Plan Area 4 (west Prebbleton) as below:-

Fig 1: Prebbleton ODP Area 4

3.2 Residential intensification of existing zoned areas in Prebbleton (and similarly located newer settlements) will not achieve the same affordable housing outcomes as a proposed greenfield development of the scale proposed by the submitters. Intensification is not generally compatible with the amenity desired by existing property owners and only occurs in an organic and piecemeal fashion over an extended period, depending on the aspirations and timeframes of the multiple landowners. It is also constrained by the location of existing dwellings, and limited ability to retrofit additional services, roading, accesses etc. Given the age (relatively recent) and quality (medium to high end) of the existing housing stock in Prebbleton, a significant proportion of existing property value is generally in the house value rather than the land value, so it simply is not economic to demolish and rebuild at higher densities. In contrast, larger greenfield (or brownfield) properties enable high quality masterplanned developments which tend to have a better design and pricing outcome. (see Adam Thompson's evidence).

4.0 Benefits for the Prebbleton Housing Market

Diversity, Choice and Affordability

4.1 Based on a dwelling density of 12 households per ha, the development will yield in the order of 450 dwellings, on lots ranging from 300m^2 to 600m^2 in size.

This enable lot prices of $160,000 - $250,000 and dwelling prices of $350,000 - $500,000. At present only 1% of dwellings are priced below $400,000, and only 25% of dwellings are priced below $600,000, in Prebbleton.

4.2 The availability of lower priced housing will have a wide range of social and economic benefits, most notably there will be more diversity in the housing stock, in terms of size and price, and this will enable more households to meet their housing needs. For example, an elderly household looking to downsize would have little opportunity to do this at Prebbleton. The smaller residences proposed will therefore allow "ageing in place" and facilitate movement between different types of housing stock, as needs change, which better utilises the housing resource as a whole.

4.3 Achieving housing affordability is a key objective of NPS-UDC and Our Space. Our Space states that 35% of all new households in Selwyn will need housing under $350 000 to buy (or $200/week to rent) to be affordable.[1] It does not, however, specify minimum targets for affordable housing, only aggregate targets for each of the three territorial authorities (Table 3).

4.4 My understanding is that Rolleston is currently considered to be the most affordable of the Selwyn townships within Greater Christchurch. A policy of restricting land supply elsewhere will create a supply shortage and increase land values and house prices outside Rolleston and social imbalance. My understanding of social science is balanced/diverse communities are more successful than imbalanced ones and ideally, a range of housing choices, with different price points, are available in all communities.

Sufficient Feasible Housing Development Capacity

4.5 The Prebbleton Structure Plan (2010, pre-earthquake) estimates demand for an additional 630 dwellings in Prebbleton over the next decade. This estimate is significantly lower than the recent construction trends, which indicate demand for an additional 1,500 dwellings in Prebbleton over the next decade.

4.6 Adam Thompson estimates that Prebbleton has commercially feasible development capacity that is practically available over the next decade, of around 10 additional infill dwellings and 90 greenfield dwellings (100 in total). Given recent demand of 150-200 new dwellings per annum, this indicated supply will be fully exhausted in less than a year. This will equally apply if demand is a more conservative 100 dwellings per annum.

[1] Our Space page 11

4.7 Prebbleton has a large number of smaller lifestyle blocks on its periphery. These have a higher value than large rural blocks and are more difficult to develop due to price and site aggregation (see Adam Thompson's evidence).

4.8 Prebbleton has only two feasible opportunities remaining for new residential development on its periphery, one being the Rhodes/Larson/Marshall properties.

4.9 The submitters' properties adjoin and can be readily serviced from existing neighbouring Living Z land. Reticulated services extend along Trents Road to existing Living 3 (rural residential) development at the Shands/Trents Road intersection and have capacity for urban development of the intervening land.

4.10 The properties are a substantial area of land and enable a large scale, master planned development with flexibility in the positioning of roading and services, and the ability to achieve connectivity between Trents and Hamptons Road, and with the existing urban area.

4.11 There are no known physical constraints which would preclude rezoning.

5.0 Benefits of Further Growth at Prebbleton

5.1 Clearly in terms of housing demand and needs, including choice and housing affordability, there is an urgent need to provide for further development at Prebbleton, in the short term as well as the medium and long term. This is necessary to give effect to the NPS-UDC, in particular Objective OA2, PA1, and PC5-11-16 (see discussion of NPS-UDC below).

5.2 In my opinion, there are no other planning reasons for not enabling further urban development now. In terms of Selwyn 2031, Prebbleton is a service centre and has considerable potential for further growth whilst remaining within the size range anticipated for a service centre. The current population (2018)[2] is 3918. Service centres are defined as centres in the 1500-6000 population size range. For a service centre, Prebbleton is well serviced with local services and amenities, including a recently consented supermarket.

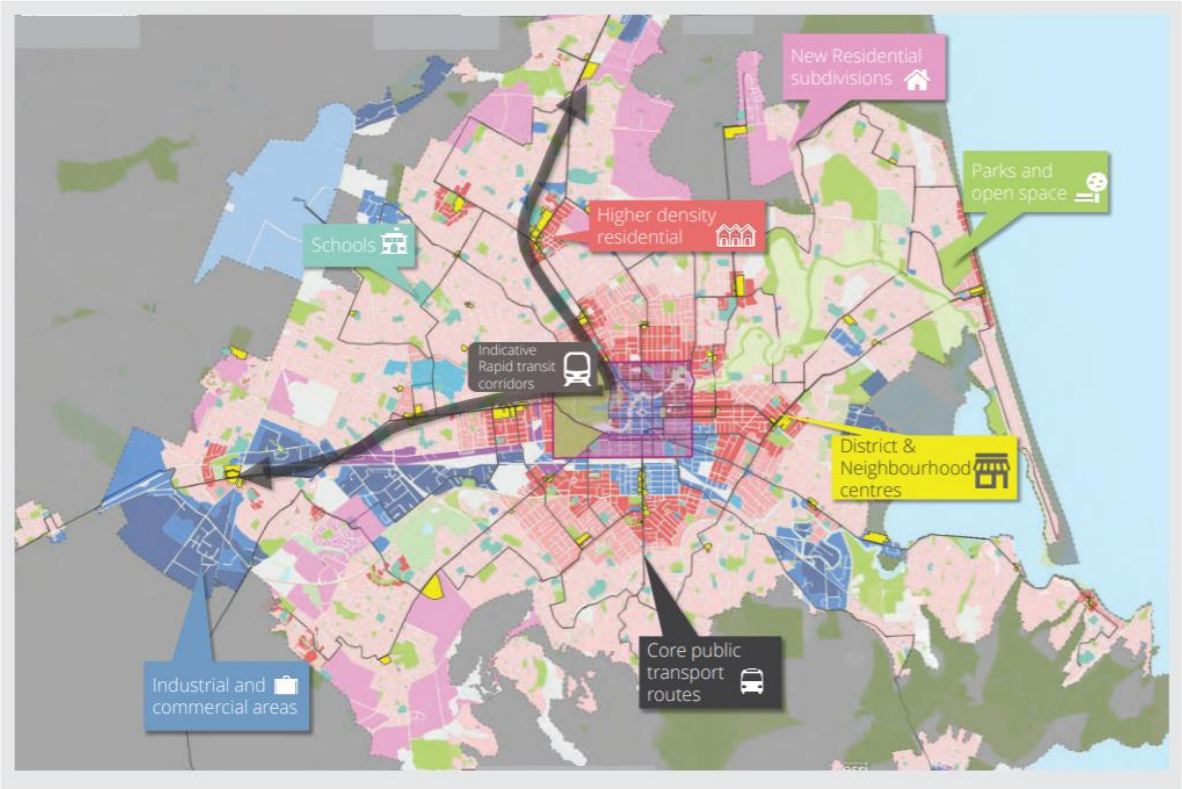
5.3 Our Space and the NPS-UDC require integration between land use and infrastructure planning. Prebbleton has excellent connectivity to the City, both via the Southern Motorway Extension, a cycleway link into the City and a very regular bus service (every

[2] taken from SDC August LTP and AMP Assumptions Report 2018-2028

half hour – the standard trip takes 37 minutes and the twice daily express service, 30 minutes).

5.4 Prebbleton is closer to the City than Selwyn's two Key Activity Centres i.e. Rolleston and Lincoln and is 'en route' to Lincoln. It can therefore 'benefit' from any service improvements at Lincoln, a Key Activity Centre. It neighbours the substantial and growing south west Christchurch industrial area shown on Fig 14 Spatial Plan below.

Figure 14: Christchurch Spatial Plan



Our Space states that *"encouraging more of the growth to occur in Christchurch City, where the employment opportunities are, will be vital to manage the effects of growth and reduce transport network pressures."* Prebbleton is far closer than much of Christchurch to the single largest and as far as I am aware, fastest growing, industrial area in the City. It is also close to and readily accessible to major employers at Lincoln including the university and research institutes. It has the capacity to achieve a high level of self sufficiency, in accordance with the CRPS C6 Policy 6.3.6 Business land *10. Encourage self-sufficiency in employment and business activities within communities across Greater Christchurch.*

6.0 Prebbleton – Preferred Future Growth Direction

6.1 The submitters' land is within the acknowledged preferred future growth path for Prebbleton. It essentially 'fills in a gap' in the concentric urban form of Prebbleton, will achieve a compact form and avoid ribbon development along the main road through Prebbleton (Springs Road) consistent with the District Plan policies for Prebbleton which include:-

Policy B4.3.64

Encourage land located to the east and west of the existing Living and Business zones, being those Living and Business zones that adjoin Springs Road, which is located as close as possible to the existing township centre as the first preferred areas to be rezoned for new residential development at Prebbleton, provided sites are available and appropriate for the proposed activity.

Policy B4.3.65

Discourage further expansion of Prebbleton township north or south of the existing Living zone boundaries adjoining Springs Road.

6.2 Urban development here will retain the identify of Prebbleton as distinct, and separated from the City's southern boundary, and from Templeton, also within the City, by rural land. I do, however, note that the landscape character of this intervening rural area has changed significantly with the Southern Motorway extension.

7.0 Our Space

7.1 Our Space is a review of the land use planning framework for Greater Christchurch. It has been prepared to satisfy the requirement to produce a future development strategy (FDS), as outlined in the National Policy Statement on Urban Development Capacity (NPS-UDC).[3] The FDS shall demonstrate that there will be sufficient, feasible development capacity in the medium and long term and that minimum housing targets set by local authorities shall be met.

7.2 Our Space sets minimum housing targets for each local authority area. They are based on a 'transitional approach' which aligns with projected demands over the medium term, but allows for a greater share of new households in Greater Christchurch to be supported

[3] Our Space p i

through redevelopment in the City over the long term. No new greenfield areas are proposed in the City.

7.3 The minimum targets (as recommended to be amended in the Officers Report[4]) identify shortfalls in Waimakariri and Selwyn in the medium and long term, and adequate capacity in the medium and long term in the City[5].

7.4 FDAs are proposed at Rolleston, Rangiora and Kaiapoi (orange areas on Figure 16). They correspond with the Projected Infrastructure Boundary (PIB) on Map A of Chapter 6 of the CRPS (C6). The PIB is a 30 year infrastructure boundary and corresponds with the 2041 Urban Limit specified in Plan Change 1 (PC1) which preceded C6. C6 provided for urban growth needs to 2028 and was produced under the Land Use Recovery Plan (LURP). The FDAs are anticipated as meeting *"*much of*"* the capacity required over the medium and long term.

7.5 There is no provision for further greenfield growth in the short, medium or long term at Prebbleton.

7.6 Our Space acknowledges that the housing capacity assessments are uncertain, in particular the assessment of commercial feasibility of housing development. It proposes a further capacity assessment in 2020 which will inform a full review of the CRPS, including C6, in 2022. In the meantime, a targeted change to C6 in 2019 is proposed, to address any need for additional housing capacity in the medium term.

7.7 It is not clear what the CRPS 2019 change will look like. The OR recommends that it identify areas for growth over the medium and long term; enable Selwyn and Waimakariri District Plan Reviews, over the medium term (my underlining), to zone and otherwise enable development capacity to meet medium term housing targets; and enable territorial authorities to respond to sufficiency of development capacity over the medium term on a rolling basis as part of periodic capacity assessments.

7.8 It is unclear whether this will enable the current District Plan Reviews (to be notified in 2020) to include additional greenfield land. It would appear this is not the intention for Selwyn at least, at this stage. Certainly to date, early consultation on the SDPR has indicated that no additional greenfield land is proposed, given Map A. This is notwithstanding that District Plan Reviews have a 10-15 year life and take several years to become operative. In the case of Selwyn, if optimistically the review is operative by

[4] OR Appendix F, Table 3 p 107
[5] Our Space Table 3, p13

2022 (unlikely), it will need to zone for medium term housing needs up to 2032 at least. Clearly, the 2019 CRPS change will need to enable zoning for medium term housing needs as part of the Waimakariri and Selwyn DPRs – to give effect to Policy PA1 of the NPS-UDC which requires medium term housing land capacity to be zoned.

7.9 No change to the fixed rural/urban boundary line is proposed, or the allocative approach of providing sufficient housing land capacity to just meet minimum housing targets and no more. Housing needs are assessed on a district wide basis, not by township or 'sub-area'[6]. All of Selwyn's additional medium and long term housing land capacity is allocated to Rolleston. I understand that is on the basis that Rolleston already has a PIB and further development here would support the western corridor rapid transit linked proposed in Our Space. I understand that there is currently no business case for the rapid transit corridors and note that Our Space acknowledges it requires as yet uncommitted Central Government funding. I'm assuming it is a key element of Our Space's *"vision for a transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle".*

8.0 National Policy Statement – Urban Development Capacity

8.1 The NPS-UDC is an 'enabling' document which "*aims to ensure that planning decisions enable the supply of housing needed to meet demand".* The Preamble (set out in full in **Appendix A**) outlines its overall focus and intent. In summary this is to:-

- Enable sufficient commercially feasible development to meet demand, both total aggregate demand and demand for different types, sizes and locations;
- Supply shall be plentiful enough to recognise that not all feasible development opportunities will be taken up;
- Ensure that planning decisions enable the market to respond efficiently to demand and function competitively, by providing plenty of opportunities for development, thus keeping prices lower, minimising artificially inflated house prices, and contributing to housing affordability;
- Enable urban development which will maximise wellbeing;
- Development capacity must be provided for in plans and supported by infrastructure;
- Encourage integration and coordination of land use and infrastructure planning;

[6] See Our Space Table 2

- Coherent planning across urban housing and labour markets, with coordinated planning between local authorities that share jurisdiction over these markets.

8.2 The above aims are to be met by application of a series of objectives and policies (see **Appendix B**). Timeframes are set for meeting actions required under the NPS-UDC. Two key ones are:-

- Set minimum targets for sufficient feasible development capacity for housing by December 2018;
- Produce a Future Development Strategy by December 2018.

8.3 The NPS-UDC must be 'given effect to' by lower order documents including regional policy statements, regional plans and district plans.

8.4 I assess Our Space against the NPS-UDC below. Our Space 'flags' important considerations for achieving the NPS-UDC. However, in my opinion it does not go far enough to ensure that the NPS-UDC approach and requirements can be met. In particular, it does not adequately assess housing development capacity or include actions which will enable the Partnership to respond to demand or needs in a timely manner.

9.0 Effective and Efficient Urban Environments

9.1 The NPS-UDC considers that for urban environments to be efficient, including with respect to housing affordability, planning decisions must limit as much as possible adverse impacts on the competitive operation of land and development markets (PA4) and consider the costs and benefits of urban development (PA4). Key elements of Our Space which may not adequately facilitate an efficient urban environment are discussed below.

<u>Minimum not maximum targets</u>

9.2 The NPS-UDC requires the setting of minimum development capacity targets for housing. However, Our Space treats these minimums as maximums by only identifying on Fig 16 as much land as is needed to achieve these minimums, and only enabling the release of enough FDA land to meet the medium term minimum targets ie. land required until 2028. The details of how this will be achieved will be specified in a CRPS C6 change, to be notified in 2019.

9.3 Whilst there is flexibility to amend the minimum targets 3 yearly in response to the required capacity updates (minimum 3 yearly) without going through the standard RMA Schedule 1 process (i.e. more quickly), there is no equivalent mechanism to amend the urban

boundaries on Fig 16 and Map A of RPS - which accommodates those minimum targets – and no more.

9.4 I am concerned that this process is controlled through the regional policy statement, and there is no ability for private requests for changes to the rural/urban boundary line or other changes which will facilitate urban development which may 'better meet' those targets or respond more quickly to the revised 'targets'.

9.5 In the Greater Christchurch context, physical land constraints are particularly relevant. I am aware that some greenfield land is TC2/3. The land condition can be highly variable even at the local level and so its suitability for development including required remediation often only becomes fully known at the time of subdivision. Such land is not always able to 'deliver' the minimum targets set for that area.

9.6 The NPS-UDC minimum targets are just that. They do not preclude Councils providing for additional development capacity – provided to do so is consistent with the rest of the NPS-UDC including coordinated infrastructure planning. There are greater benefits and very few costs in enabling some extra capacity (see Adam Thompson's evidence).

9.7 Given the significant level of uncertainty with the development capacity assessments (acknowledged by Our Space), providing some additional capacity would seem prudent.

9.8 For example, for the CBD there is an ambitious target for the population to increase from around 5000-6000 to 20 000 by 2028. A recent Property Council report (see **Appendix D**) concludes that this is ambitious and not achievable within the set timeframe:-

The aim of having 20,000 residents in Christchurch Central is unrealistic within the purported timeframes. That number is more than Wellington's CBD which only has 16,300 residents - despite having 1.2 million square metres of office stock and the university in town with over 17,000 EFTS. Christchurch Central by comparison only has around 340,000 square metres of office stock and a smaller university (12,500 EFTS) which is located in the suburbs and unlikely to move in our lifetime.

There were only 8,200 residents in the CBD pre-quakes. Reaching 20,000 is a 142% increase on this number. From today's figure of 5,860 that increase is 241%. Given the city's entire population only surpassed pre-quake levels in 2017, reaching 20,000 CBD residents is admittedly ambitious.

Fixed non contestable rural/urban boundary line in CRPS

9.9 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 -see Adam Thompson's evidence).

9.10 These are the conclusions of the Auckland Unitary Plan hearing process (see discussion below under 'Auckland Unitary Plan Hearings – Findings').

9.11 I note that appropriateness of the fixed rural/urban boundary in the CRPS has never been tested, despite the fact that it has been in existence since 2007 (in Plan Change 1 to the CRPS, the predecessor to C6). C6 was implemented under Land Use Recovery Plan (LURP) streamlined procedures. Appeals were restricted to points of law and appeals on its predecessor PC1 were extinguished.

Costs and Benefits

9.12 There is no s32 'costs and benefits' assessment accompanying Our Space despite its defining role in directing the urban growth approach for Greater Christchurch for the next 30 years. This is inconsistent with PA4 which requires decision makers to assess the costs and benefits of urban development. I note that any subsequent changes to the CRPS to implement Our Space will require a s32 assessment, whether promulgated under s80C streamlined or normal Schedule 1 RMA processes.

9.13 Prebbleton has excellent 'fundamentals' to support further growth, as outlined above. Development of the submitters' land in the immediate future will have significant positive social and economic benefits and no costs. It will enable delivery of a greater range and choice of housing, including more affordable housing than currently exists, enabling more households to meet their housing needs. If no further land is made available for development there will be a rapid increase in house prices and a decrease in affordability, as discussed in Adam Thompson's evidence. I note the Prebbleton market is already skewed to the middle/upper end.

9.0 Sufficient Commercially Feasible Development Capacity

9.1 Sufficient commercially feasible development capacity is to meet demand, and provide choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations.

9.2 Adam Thompson has assessed feasible housing development capacity in Selwyn, including Prebbleton. He has taken has his starting point Our Space's 35% allocation to Selwyn and Waimakariri and 65% to the City. In his assessment, the minimum targets set out inadequate to meet demand and facilitate an efficient housing market.

9.3 The FDS proposes that future greenfield growth for the medium and much of the long term will be met within the Map A PIB i.e. the FDAs, where it will support the proposed public transport enhancement opportunities[7].

9.4 The PIB has become the de facto long term 'urban limit'. This is an infrastructure boundary and there has been no re-examination since 2007 (12 years ago) as to whether it remains the appropriate basis for determining future growth directions for the next 30 years.

9.5 We know that greenfield areas in Waimakariri and Selwyn have grown faster than anticipated, including townships not within the PIB, including Prebbleton; and that with motorway improvements these greenfield areas have become more readily 'connected' to the City. Employment patterns have also significantly changed since the earthquakes, with a generally westward shift. There are also excellent bus services to the District townships. For example, there is a daily half hourly service between Lincoln, Prebbleton and the City.

9.6 Directing all growth to the PIB areas will not provide sufficient choices which will meet the needs for a range of dwelling types and locations, in particular at Prebbleton.

10.0 A Robustly Developed, Comprehensively and Frequently Updated Evidence Base

10.1 Adam Thompson has undertaken a detailed evaluation of the sufficiency of housing land capacity in each main township (Rolleston, Lincoln and Prebbleton) to meet Our Space's target of 20% of housing growth in Selwyn. The methodology is clearly explained and readily understandable. It includes a conservative 7 year buffer of live zoned land, less than the NPS-UDC requirement for a 10 year buffer. Open Space does not include a buffer and relies on aggregated household growth projections and targets for housing capacity for the District as a whole. Whilst I am not an expert in this area, Mr Thompson's

[7] Our Space Section 5.3

approach would appear to be more comprehensive and robust and more in line with the NPS-UDC requirement for local authorities to *"estimate housing demand, including for different types, locations and price pints, and the supply of development capacity to meet that demand, in the short, medium and long term"*(Policy PB1).

11.0 Responsive Planning

11.1 Local authorities are to adapt and respond to evidence about urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.

11.2 Section 6.1 recognises the need for responsive planning and notes that many of the primary drivers and influencers of urban development are in a state of change e.g. due to evolving technologies, Government policy, need to adapt to coastal hazard risks. However, no mention is made of the need to respond to market signals e.g. value of land and impact on housing affordability.

11.3 In my opinion, controlling urban growth through an uncontestable regional policy statement policy is not responsive, timely planning that enables people to provide for their social and economic wellbeing. It requires community and landowner involvement in multiple planning 'layers' and processes which are costly, slow and uncertain, and only triggered by a territorial authority application (not a private plan change for example).

11.4 I accept that the wider issues raised in this evidence are likely to be 'open for debate' as part of the proposed 2022 full CRPS review. This is simply too late to meet the requirements of the NPS-UDC.

11.5 Realistically, the CRPS and subsequent District Plan review processes will take 2-4 years (once notified). It is a full review of all chapters not just C6. The subsequent District Plan change processes will take a further 1-3 years (depending on whether they are private or Council initiated plan changes and whether they are district wide or more site specific). It will be at least 2025 – 2027 before zoning is in place, or 2027 – 2029 if the CRPS review process only commences in 2022. It is also a hugely costly process for landowners and the community to participate in.

11.6 In my opinion, a mechanism needs to be put in place now to enable councils to respond to short and medium term capacity needs – including efficient and timely implementation to enable appropriate development 'on the ground'.

11.7 Our Space Schedule of Future Work No. 9 includes *"undertake detailed planning work for the relevant towns in Selwyn and Waimakariri including evaluating zoning options to promote consolidated townships and investigate opportunities to encourage the provision and take up of a range of housing types to meet future demands"* – between 2019-2023. The Selwyn and District Plan Reviews are noted as 'linked processes' for this work. However, the timeframe of 2019-2023 does not fit with the proposed 2020 notification date for the Selwyn DP Review, and 'overlaps' the proposed full RPS 2022 review.

11.8 My suggested solution is set out below to respond in a more timely manner to urgent housing land capacity needs, in particular at Prebbleton, is outlined below.

12.0 Coordinated Planning

12.1 Our Space does facilitate coordinated planning including integration between land use planning and infrastructure. However, in my opinion, it does more than is necessary to facilitate coordinated planning. The CRPS only needs to specify minimum housing development capacity targets (as minimums not maximums), and general directions for growth. District Councils are best placed to work with landowners and the local community through their structure and infrastructure planning processes to determine the detail, including how and when further land should be released and the appropriate densities that should apply. Private plan changes should also be possible, with relevant plans including guidance regarding appropriate criteria to be met.

13.0 Auckland Unitary Plan Hearing (AUP) Findings

13.1 The AUP decisions (2016) predate the NPS-UDC. The circumstances of the Auckland Region and Greater Christchurch are different in some fundamental ways – Auckland is much bigger and has far more severe housing shortage and affordability issues and it is not regenerating after a major earthquake event. However, key principles of urban planning still equally apply to both areas. AUP and Our Space both adopt a centres and corridors strategy with provision for increased residential intensification around centres and transport nodes, and along transport corridors (including in greenfield developments). Key findings which I consider highly relevant to Our Space are set out below.

Enabling Growth

13.2 In the Report to Auckland Council Overview of Recommendations on the proposed Auckland Unitary Plan 22 July 2016[8] see the Panel considered that the Unitary Plan should err toward over-enabling, as there was a high level of uncertainty in the estimates of demand and supply over the long term, and the costs to individuals and the community of under-enabling capacity are much more severe than those arising from over-enabling capacity.

13.3 To provide for sufficient residential capacity it considered the Plan needed to both enable a large step-change in capacity in the short to medium term and to provide a credible pathway to ongoing supply over the long term.

13.4 Amongst other methods the Panel recommended the following approaches to increase residential, commercial and industrial capacity.

- Introduce, where justified by the evidence, operative urban zones (including Business - Light Industry Zones) in areas that would otherwise have been zoned Future Urban Zone.
- Expand the Rural Urban Boundary to include 30 per cent more land area targeted for future urbanisation, and not impose a Rural Urban Boundary around smaller towns and villages so they are able to grow organically.
- Locate the Rural Urban Boundary line at the district plan level, with criteria for any change set out in the regional policy statement, so that there is a firm framework for any change but that such change can be initiated by parties in addition to Council.
- Include in the regional policy statement a requirement for the Council to monitor and ensure that there is always suitably zoned land to meet expected demand for residential, commercial and industrial use for at least seven years.

Enabling a development pattern to meet long-term demand

13.5 The Panel considered[9] that there were compelling reasons to ensure the Unitary Plan enables a development pattern that is capable of meeting residential demand over the long term and does not limit its focus to just the next ten years or so. This is consistent with the NPS-UDC which requires preparation of a FDS with a 30 year timeframe.

[8] See https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihpoverviewofrecommendations.pdf,

[9] Section 6.2.2

13.6 In summary these are:

(i) housing development is not readily reversible and generally has an economic life of at least 50 years, so that once an area is developed according to an existing land use plan, future plan changes to that area are unlikely to have any effect on capacity until it once again becomes economic for redevelopment. Therefore, it is important that the Unitary Plan is calibrated to demand over the long term, and not to just immediate concerns.

(ii) The issue of complementary investments in transport systems, water, wastewater and stormwater networks, electricity and telecommunications networks, and other infrastructure. These investments are also not readily reversible and need to be configured with the long-term development pattern in mind. The Unitary Plan is a key component in forming that long-term pattern for the region.

(iii) Lastly the implications for individuals and the community from an under-supply of enabled residential capacity (e.g. house price escalation, over-crowding, extended commuting distances, and migration out of the region) are much more severe than those of an oversupply of enabled capacity (e.g. the inefficient use for a period of land zoned for future urban use). Property markets are able to respond to the over-supply of enabled capacity by, for example, deferring the development of some land zoned for future urban, whereas markets are not able to remove the constraints and distortions from the under-supply of enabled capacity.

13.7 In summary therefore the Panel considered it critical to the long-term well-being of people and communities in the region that the Unitary Plan enabled a development pattern that is capable of meeting residential demand over the long term, and that it errs toward overenabling capacity.

13.8 The Panel also reported that when determining the most efficient sequencing of development, aspects that should be considered include the cost to develop an area, the cost and timing to provide infrastructure servicing, the ability and readiness of land owners and developers to invest and proceed, and the market attractiveness of the area[10].

[10] Section 6.2.7, page 60

The Rural Urban Boundary

13.9 The Panel acknowledged that the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, but the Panel did not consider that it promoted the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing.

13.10 The Panel at the time considered that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances.

13.11 For these reasons the Panel recommended that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person.

13.12 The report went on to state that:

The Rural Urban Boundary is a useful planning tool to manage growth and infrastructure servicing and should not be removed entirely. However, the Panel does not consider that the weight of evidence supports the Rural Urban Boundary method being located in the regional policy statement. A contestable Rural Urban Boundary with a robust foundation against which to assess proposals to move it best avoids the adverse social, economic and environmental effects that the evidence indicates have been and are being caused by the operative Metropolitan Urban Limit. Locating the Rural Urban Boundary method in the district plan will best promote the purpose of the Resource Management Act 1991 and provide for the social and economic well-being of people *and communities in the region.*

14.0 Our Space - A More Flexible, Responsive Approach

14.1 My recommendation is that the fixed non contestable rural/urban boundary line be removed from the CRPS, to be replaced with minimum (not maximum) housing development capacity targets, and a more flexible 'directions for growth' approach in the CRPS, to implemented at District Plan level.

14.2 I accept that this is a shift from status quo. In my opinion, it is well overdue for consideration, given the history of C6.

14.3 A pragmatic solution could be for the CRPS change to C6 to run concurrently with the Waimakariri and Selwyn District Plan Reviews due to be notified in 2020. I am aware Waimakariri is undertaking structure planning for its FDAs to be input into the DPR. Selwyn could do the same – but widen their scope to consider Prebbleton, given that Prebbleton has only 1 year of remaining development capacity.

14.4 If the Panel is of a mind to retain the fixed rural/urban boundary in C6 at this stage, it could be labelled 'indicative' and a more flexible objective and policy framework included in the C6 which enables consideration of urban development proposals outside the current boundary under specified circumstances; and the rural/urban boundary line should be amended to include all the submitters' land and such other land as is necessary to facilitate a logical, consolidated urban form.

14.5 I suggest an additional policy (or similar) and consequential amendments to the CRPS C6 objective and policy framework as below. This will enable District Councils to change their district plans to facilitate meritorious proposals for urban growth and for private plan change requests for the same.

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 urban expansion or development will have beneficial planning outcomes; and

(v) The criteria in Policy 6.3.11 (5) (a) to (h) inclusive are met; or

(v) The urban expansion or development is necessary to give effect to the National Policy Statement – Urban Development Capacity; and the criteria in Policy 6.3.11 (5)(a) to (h) inclusive shall be met.

Explanation:

This policy recognises that a flexible, responsive and timely approach to urban growth management is necessary to give effect to the National Policy Statement – Urban Development Capacity which focusses on enabling commercially viable land development capacity which meets demand, including for a range of dwelling types, and locations, working environments and places to locate business. A responsive planning approach is also necessary given the uncertainties associated with the housing and business land capacity assessments which have informed Map A, and with the primary drivers and influencers of urban development in Greater Christchurch; and the need to respond local circumstances which have not been considered at the strategic level of the CRPS.

15.0 Section 32 Assessment

15.1 In my opinion, my recommended Our Space approach (or similar) is a more efficient and effective option in terms of s32 to give effect to the NPS-UDC. Waiting until the 2022 full RPS review to respond to the housing demands and needs of townships other than Rolleston, including Prebbleton; and to continue to rely on a rigid rural/urban boundary set in the CRPS C6 to manage growth is not efficient or effective. It will not deliver balanced communities with affordable housing, or promote the Purpose of the Act, and is not responsive planning.

16.0 Officers Report

16.1 The OR is not a robust merit-based assessment of submissions in my opinion. It has a standard response with respect to all submissions seeking further greenfield land i.e. they "*do not consider the additional land proposed by the submitters is preferable to*

that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium or long term for Greater Christchurch." The evidence is that this is clearly not the case for this submission with respect to Prebbleton at least.

16.2 I have set out above why I strongly disagree with the OR that the relief sought by submitters seeking additional greenfield land is best left to consideration at the time of the full CRPS Review in 2022 – and subsequent District Plan processes. The officers recommendations, despite the economic and capacity evidence of Mr Thompson, is an illustration of why I express the views above, that growth management should be a contestable process, with recourse to independent decision makers, that robustly test the evidence of parties to the proceedings.

17.0 Conclusion

17.1 Prebbleton has only one year of commercially feasible housing development capacity left. Further housing development capacity is urgently needed to meet demand and the needs of the community for a greater diversity of housing stock, including smaller more affordable housing. This is essential to give effect to the NPS-UDC in particular OA2, PA1 and PC5-11-16.

17.2 The submitters' land is within the 'preferred urban form' growth path for Prebbleton and is ideally located to meet the significant shortfall in development capacity.

17.3 Prebbleton is well located to deliver self-sufficient, sustainable growth. It is close to significant employment areas and is well connected by a range of transport modes to the City.

17.4 Our Space 'flags' important considerations for achieving the NPS-UDC. However, it does not go far enough to ensure that the NPS-UDC approach and requirements can be met. In particular, it does not adequately assess housing development capacity or include actions which will enable the Partnership to respond to demand or needs in a timely manner.

17.5 With respect to Selwyn District at least, Our Space will not enable efficient and effective environments or sufficient development capacity to meet demand. It has not adequately considered the costs and benefits of urban development and does not facilitate responsive planning.

17.6 A more flexible, responsive approach is necessary. I recommend that the fixed non-contestable rural/urban boundary line be removed from the CRPS, to be replaced with minimum (not maximum) housing development capacity targets, criteria for movement of the urban boundary, and a more flexible 'directions for growth' approach in the CRPS, to implemented at District Plan level.

17.7 If the Panel is of a mind to retain the current rural/urban boundary line, I recommend it be identified as 'indicative' and at the very least a more flexible policy framework should be included in C6 – my suggested Policy 6.3.1A or similar. This will enable amendments to the rural/urban boundary to be considered at district plan level, with strategic direction in C6 and based on the merits of a plan change application.

17.8 The submitters' request that their land is identified for future urban development in the Our Space strategy and is subsequently) zoned (as a Greenfield Priority Area) accordingly in the pending district plan review as a matter of urgency.

Appendices

Appendix A Preamble – National Policy Statement – Urban Development Capacity

Appendix B Objectives and Policies - National Policy Statement – Urban Development Capacity

Appendix C Prebbleton Preferred Urban Form (Selwyn Rural Residential Strategy 2014)

Appendix D Property Council Report –Christchurch CBD Residential Development

Appendix A

Preamble – National Policy Statement – Urban Development Capacity

Preamble

New Zealand is highly urbanised, with 73 percent of us living in urban areas of at least 30,000 people.[1]

Urban environments are characterised by the closeness of people and places, and the connections between them. They enable us to live, work and play in close proximity, giving us access to amenity, services and activities that people value. While urban environments share these common characteristics, they also have unique local variations; the traits that make one urban environment different from another. Urban environments often have high rates of population and economic growth. Reflecting this, they are dynamic, and are constantly changing to reflect the needs of their communities. This constant change can have both positive and negative impacts: well-functioning urban areas maximise the positives and minimise the negatives.

Well-functioning urban environments provide for people and communities' wellbeing. They provide people with access to a choice of homes and opportunities to earn income, good connections between them, and attractive built and natural environments. They have good quality physical and social infrastructure and open space. They make efficient use of resources and allow land uses to change to meet the changing needs of their inhabitants while protecting what is precious. They make the most of their ability to connect to other parts of the world through trade and the movement of goods and people. Such urban environments attract people and investment, and are dynamic places that make a significant contribution to national economic performance.

Local authorities play an important role in shaping the success of our cities by planning for growth and change and providing critical infrastructure. Ideally, urban planning should enable people and communities to provide for their social, economic, cultural and environmental wellbeing through development, while managing its effects. This is a challenging role, because cities are complex places; they develop as a result of numerous individual decisions, and this often involves conflict between diverse preferences.

This national policy statement provides direction to decision-makers under the Resource Management Act 1991 (RMA) on planning for urban environments. It recognises the national significance of well-functioning urban environments, with particular focus on ensuring that local authorities, through their planning, both:

- enable urban environments to grow and change in response to the changing needs of the communities, and future generations; and
- provide enough space for their populations to happily live and work. This can be both through allowing development to go "up" by intensifying existing urban areas, and "out" by releasing land in greenfield areas.

This national policy statement covers development capacity for both housing and business, to recognise that mobility and connectivity between both are important to achieving well-functioning urban environments. Planning should promote accessibility and connectivity between housing and businesses. It is up to local authorities to make decisions about what sort of urban form to pursue.

This national policy statement aims to ensure that planning decisions enable the supply of housing needed to meet demand. This will contribute to minimising artificially inflated house prices at all levels and contribute to housing affordability overall. Currently, artificially inflated house prices drive inequality, increase the fiscal burden of housing-related government subsidies, and pose a risk to the national economy.

Local authorities need to provide for the wellbeing of current generations, and they must also provide for the wellbeing of the generations to come. The overarching theme running through this national policy statement is that planning decisions must actively enable development in urban environments, and do that in a way that maximises wellbeing now and in the future.

This national policy statement does not anticipate development occurring with disregard to its effect. Local authorities will still need to consider a range of matters in deciding where and how development is to occur, including the direction provided by this national policy statement.

Competition is important for land and development markets because supply will meet demand at a lower price when there is competition. There are several key features of a competitive land and development market. These include providing plenty of opportunities for development. Planning can impact on the competitiveness of the market by reducing overall opportunities for development and restricting development rights to only a few landowners.

This national policy statement requires councils to provide in their plans enough development capacity to ensure that demand can be met. This includes both the total aggregate demand for housing and business land, and also the demand for different types, sizes and locations. This development capacity must also be commercially feasible to develop, and plentiful enough to recognise that not all feasible development opportunities will be taken up. This will provide communities with more choice, at lower prices.

Development capacity must be provided for in plans and also supported by infrastructure. Urban development is dependent on infrastructure, and decisions about infrastructure can shape urban development. This national policy statement requires development capacity to be serviced with development infrastructure, with different expectations from this infrastructure in the short, medium and long-term. It encourages integration and coordination of land use and infrastructure planning. This will require a sustained effort from local authorities, councilcontrolled organisations, and infrastructure providers (including central government) to align their intentions and resources.

Another key theme running through the national policy statement is for planning to occur with a better understanding of land and development markets, and in particular the impact that planning has on these. This national policy statement requires local authorities to prepare a housing and business development capacity assessment and to regularly monitor market indicators, including price signals, to ensure there is sufficient development capacity to meet demand. Local authorities must respond to this information. If it shows that more development capacity needs to be provided to meet demand, local authorities must then do so. Providing a greater number of opportunities for development that are commercially feasible will lead to more competition among developers and landowners to meet demand.

This national policy statement also places a strong emphasis on planning coherently across urban housing and labour markets, which may cross local authority administrative boundaries. This will require coordinated planning between local authorities that share jurisdiction over urban housing and labour markets. This includes collaboration between regional councils and territorial authorities

who have differing functions under the RMA, but which all impact on and are impacted on by urban development.

This national policy statement recognises that the benefits of the statement are greatest in urban areas experiencing the highest levels of growth. It takes a tiered approach to the application of policies using the Statistics New Zealand urban areas classification, and population projections to target different policies to different local authorities. This classification also informs local authorities that they must work together. The boundaries of the urban areas do not restrict the area in which the local authorities apply the policies.

Local authorities that have a high-growth urban area within their jurisdiction are expected to meet all of the requirements of policies in this national policy statement, while local authorities with medium-growth urban areas in their jurisdiction, and all other local authorities, have lesser requirements, as per the table below.

	All local authorities	Local authorities that have a medium-growth urban area within their district or region	Local authorities that have a high-growth urban area within their district or region
Objectives that apply	All	All	All
Policies that apply	PA1 - PA4	PA1 - PA4	PA1 - PA4
		PB1 - PB7 PC1 - PC4 PD1 - PD2	PB1 - PB7 PC1 - PC4 PD1 - PD2
			PC5 - PC14 PD3 - PD4

This preamble may assist the interpretation of the national policy statement.

Appendix B

Objectives and Policies: National Policy Statement – Urban Development Capacity

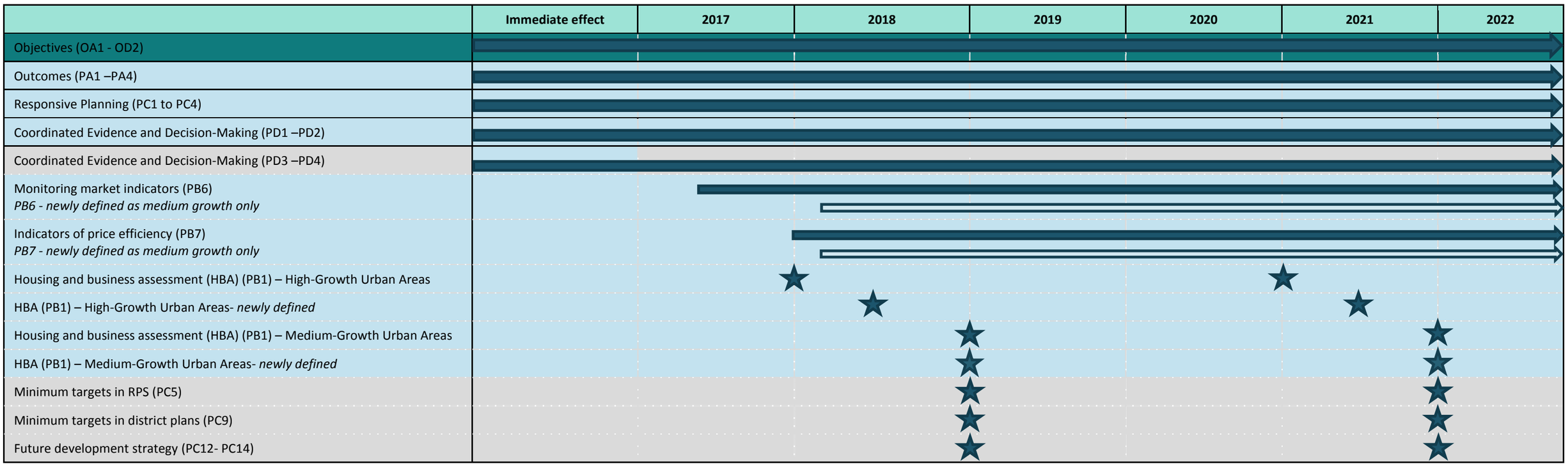
Summary of the National Policy Statement on Urban Development Capacity (updated 23 November 2017)

	A: Outcomes for planning decisions	B: Evidence and monitoring to support planning decisions	C: Responsive planning	D: Coordinated planning evidence and decisions
Objectives	*These **objectives** apply to **all local authorities and decision-makers.** Policies PA1 to PA4 apply to any urban environment expecting to experience growth.*			
	OA1. Effective and efficient urban environments that enable people and communities and future generations to provide for social, economic, cultural and environmental wellbeing. OA2. Urban environments that have sufficient opportunities to meet demand, and which provide choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses. OA3. Urban environments that, over time, develop and change in response to the changing needs of people and communities and future generations.	OB1. A robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments.	OC1. Planning decisions, practices and methods that enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long term. OC2. Local authorities adapt and respond to evidence about urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.	OD1. Urban environments where land use, development, development infrastructure and other infrastructure are integrated with each other. OD2. Coordinated and aligned planning decisions within and across local authority boundaries.
		*Policies PB1-PB7, PC1-PC4, PD1 and PD2 apply to local authorities with a **Medium** or **High-Growth Urban Area** within their district or region. The application of the policies is not restricted to the boundaries of the **Urban Area.***		
Policies	PA1. Local authorities shall ensure that at any one time there is **sufficient development capacity** available as follows: • **Short term** capacity must be **feasible**, zoned and serviced with **development infrastructure** • **Medium term** capacity must be **feasible**, zoned and either serviced with **development infrastructure,** or development infrastructure identified in a long term plan under the LGA • **Long term** capacity must be feasible, identified in relevant plans and strategies, and the **development infrastructure** to support it must be identified in an infrastructure strategy under the LGA PA2. Local authorities shall satisfy themselves that **other infrastructure** required to support urban development is likely to be available. PA3. When making decisions that affect the way and rate at which development capacity is provided, decision-makers shall provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, having regard to: • Providing choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses • Promoting efficient use of scarce urban land and infrastructure • Limiting as much as possible adverse impacts on the competitive operation of land and development markets. PA4. When considering effects of urban development, decision-makers shall take into account: • The benefits that urban development will provide with respect to the ability of people, communities and future generations to provide for their social, economic, cultural and environmental wellbeing • The benefits and costs of urban development at a national, inter-regional, regional and district scale, as well as local effects.	PB1. Local authorities shall carry out a **housing and business development capacity assessment** at least three-yearly that: • Estimates housing demand, including for different types, locations and price points; and the supply of development capacity to meet that demand, in the short, medium and long terms. • Estimates demand for different types and locations of business land and floor area for businesses and the supply of development capacity to meet that demand in the short, medium and long terms. • Assesses interactions between housing and business activities, and their impacts on each other. PB2. The assessment shall use information about demand including: • Demographic change (including Statistics New Zealand population projections) • Future changes in business activities of the local economy and potential impacts on demand for housing and business land • Market indicators monitored under PB6 and PB7. PB3. The assessment shall estimate the sufficiency of development capacity provided by plans including: • The cumulative impact of all zoning, objectives, policies, rules and overlays in plans • Actual and likely availability of infrastructure under PA1 • Current feasibility of development capacity • Rate of take up of development capacity • The market's response to planning decisions obtained through monitoring indicators under PB6 and PB7. PB4. The assessment shall estimate the additional capacity needed if any of the above factors indicate that the supply of development capacity is not likely to meet demand in the short, medium or long term. PB5. In carrying out the assessment local authorities shall seek and use the input of iwi authorities, the property development sector, significant land owners, social housing providers, requiring authorities and the providers of development and other infrastructure. PB6. To ensure they are well-informed about demand, development capacity, urban development activity and outcomes and how planning decisions may affect this, local authorities shall **monitor** quarterly: • Prices and rents for housing, residential and business land by location and type; and changes in these over time • Resource and building consents relative to population growth • Indicators of housing affordability. PB7: Local authorities shall use information provided by indicators of price efficiency in their land and development market, such as price differentials between zones, to understand how well the market is functioning and how planning may affect this, and when additional development capacity might be needed. *Local authorities are encouraged to publish the housing and business development capacity assessment under PB1 and monitoring results under PB6 and PB7.*	PC1.To factor in the proportion of feasible development capacity that may not be developed, in addition to the requirement to ensure sufficient, feasible development capacity as outlined in PA1, local authorities shall also provide an additional margin of feasible development capacity over and above projected demand of at least: 20% in the short and medium term; and, 15% in the long term. PC2. If evidence from the assessment under PB1, including information about the rate of take-up of development capacity, indicates a higher margin is more appropriate, this higher margin should be used. PC3. When the housing and business development capacity assessment or monitoring indicates development capacity is not sufficient in any of the short, medium or long term, local authorities shall respond by providing further development capacity and enabling development. PC4. Local authorities shall consider all practicable options for providing sufficient, feasible development capacity and enabling development to meet demand including: • Changes to plans and regional policy statements including zoning, objectives, policies, rules and overlays that apply in both existing urban environments and greenfield areas • **Integrated and coordinated consenting processes that facilitate development** • Statutory tools and other methods available under other legislation. *These policies apply to local authorities with a **High-Growth Urban Area** within their district or region. Local authorities with a **Medium-Growth Urban Area** within their district or region are encouraged to give effect to these policies. The application of the policies is not restricted to the boundaries of the **Urban Area**.* PC5-11. Local authorities shall set **minimum targets** for sufficient, feasible development capacity for housing. Regional councils shall incorporate these into their regional policy statement and territorial authorities shall incorporate these as an objective in their relevant plan. Minimum targets shall be set for the medium and long terms and reviewed every three years. When evidence shows that the minimum targets set in the regional policy statement or relevant plans are not sufficient, local authorities shall revise those minimum targets. Local authorities shall set and revise the minimum targets in their regional policy statement or relevant plan without going through the consultation process set out in Schedule 1 of the RMA. PC12-14. Local authorities shall produce a **future development strategy** that demonstrates there will be sufficient, feasible development capacity in the medium and long terms and that the minimum targets will be met. This strategy shall: • Identify the location, timing and sequencing of future development capacity for the long-term, including both future greenfield areas and intensification opportunities in existing urban environments • Balance certainty about future urban development with being responsive to demand. This strategy: • Shall be informed by the relevant long term plans and infrastructure strategies under the Local Government Act 2002 (LGA) • Can be incorporated into a non-statutory document outside the RMA. In developing this strategy local authorities should: • Undertake a consultation process that complies with either Part 6 of the LGA, or Schedule 1 of the RMA • Be informed by the housing and business development capacity assessment • Have particular regard to policy PA3 when considering how to provide development capacity.	PD1. Local authorities that share jurisdiction over an **Urban Area** are strongly encouraged to work together to implement this NPS, and particularly to cooperate and agree on: • A joint housing and business development capacity assessment • The provision and location of sufficient, feasible development capacity. PD2. Local authorities shall work with providers of **development infrastructure** and **other infrastructure** to achieve integrated land use and infrastructure planning in order to implement PA1-PA3, PC1 and PC2. PD3. Local authorities that share jurisdiction over an **Urban Area** are strongly encouraged to cooperate and agree upon: • The specification of minimum targets and their review • The development of a joint future development strategy. PD4. Local authorities shall work with providers of **development infrastructure** and **other infrastructure** in preparing the future development strategy.

Which NPS-UDC objectives and policies apply to which local authorities

Area	Relevant Local Authorities	Relevant Objectives and Policies for Implementation		
	(Subject to change as population projections are revised)	All Objectives and Policies PA1-PA4	Policies PB1-PB7, PC1-PC4 and PD1-PD2	Policies PC5-PC14 and PD3-PD4
High-Growth Urban Areas				
Auckland	Auckland Council	X	X	X
Christchurch	Christchurch City Council, Waimakariri District Council, Selwyn District Council, Environment Canterbury Regional Council	X	X	X
Hamilton	Hamilton City Council, Waipa District Council, Waikato Regional Council	X	X	X
New Plymouth*	New Plymouth District Council, Taranaki Regional Council	X	X	X
Tauranga	Tauranga City Council, Western Bay of Plenty District Council, Bay of Plenty Regional Council	X	X	X
Queenstown	Queenstown Lakes District Council, Otago Regional Council	X	X	X
Whangarei*	Whangarei District Council, Northland Regional Council	X	X	X
Medium-Growth Urban Areas				
Dunedin*	Dunedin City Council, Otago Regional Council	X	X	
Gisborne*	Gisborne District Council	X	X	
Kapiti	Kapiti Coast District Council, Greater Wellington Regional Council	X	X	
Marlborough*	Marlborough District Council	X	X	
Napier-Hastings*	Napier City Council, Hastings District Council, Hawkes Bay Regional Council	X	X	
Nelson	Nelson City Council, Tasman District Council	X	X	
Palmerston North	Palmerston North City Council, Horizons Council	X	X	
Rotorua*	Rotorua District Council, Bay of Plenty Regional Council	X	X	
Wellington	Wellington City Council, Porirua City Council, Lower Hutt City Council, Upper Hutt City Council, Greater Wellington Regional Council	X	X	
Rest of New Zealand				
Other areas	All Objectives and Policies PA1-PA4: Those local authorities that contain an 'urban environment' and expected to experience growth. All Objectives: Those local authorities that contain an 'urban environment'.	X		
*Denotes those urban areas newly identified as medium or high growth during 2017.				

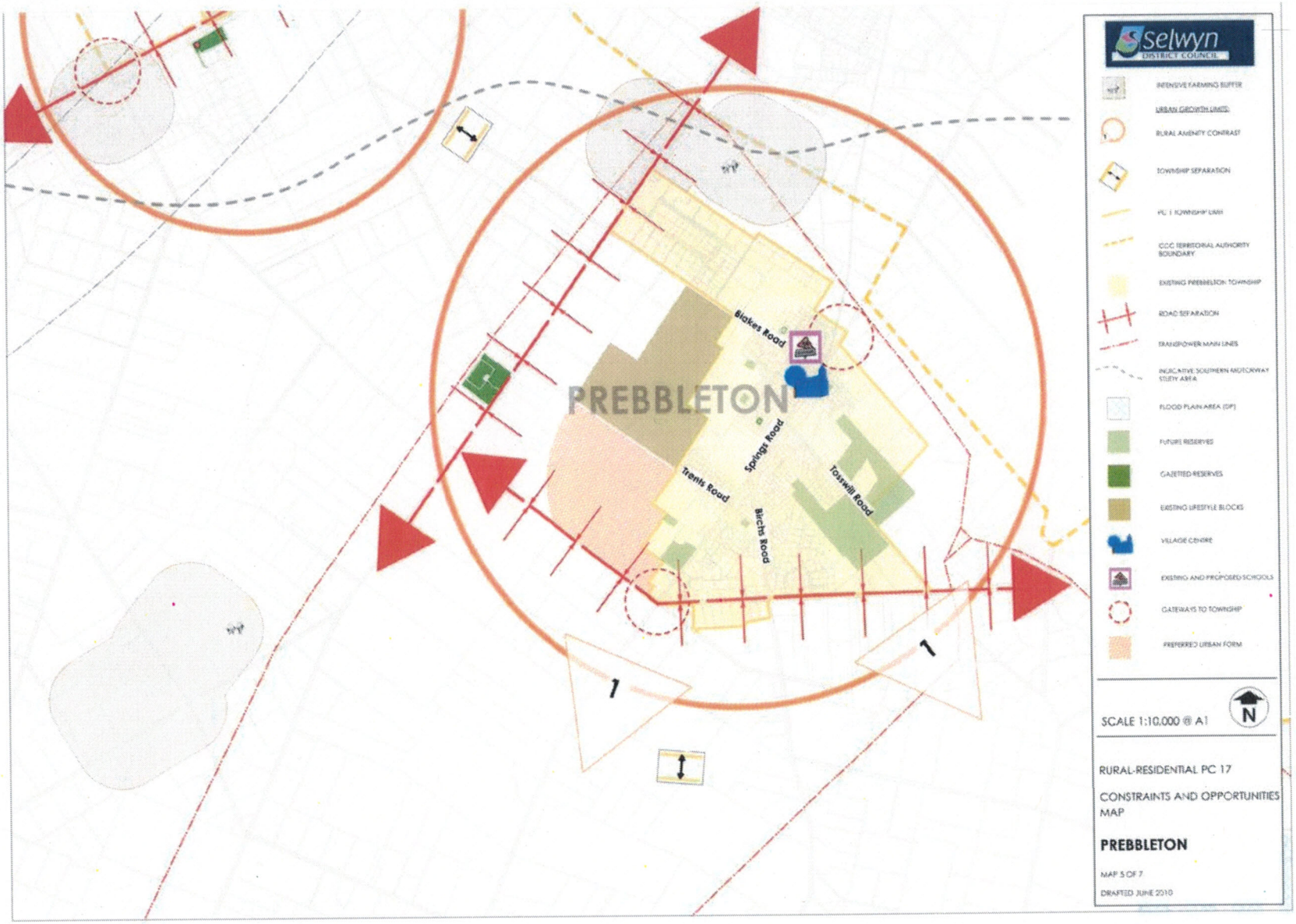
Timeframes for Implementation



Appendix C

Prebbleton Preferred Urban Form

(Selwyn Rural Residential Strategy 2014)


selwyn
DISTRICT COUNCIL
INTENSIVE FARMING BUFFER
URBAN GROWTH LIMITS
RURAL AMENITY CONTRAST
TOWNSHIP SEPARATION
PC 17 TOWNSHIP LIMIT
CCC TERRITORIAL AUTHORITY BOUNDARY
EXISTING PREBBLETON TOWNSHIP
ROAD SEPARATION
TRANSPOWER MAIN LINES
INDICATIVE SOUTHERN MOTORWAY STUDY AREA
FLOOD PLAIN AREA (DP)
FUTURE RESERVES
GAZETTED RESERVES
EXISTING LIFESTYLE BLOCKS
VILLAGE CENTRE
EXISTING AND PROPOSED SCHOOLS
GATEWAYS TO TOWNSHIP
PREFERRED URBAN FORM
PREBBLETON
Blakes Road
Springs Road
Trents Road
Birchs Road
Tosswill Road
1
1
SCALE 1:10,000 @ A1
N
RURAL-RESIDENTIAL PC 17
CONSTRAINTS AND OPPORTUNITIES MAP
PREBBLETON
MAP 5 OF 7
DRAFTED JUNE 2010

Appendix D

Property Council Report

Property Council Report – Central Christchurch Residential Seminar, August 2018

What's stopping residential development in Christchurch's CBD?

On 31 July, Property Council's South Island Branch hosted an event that explored the barriers, challenges and opportunities facing residential development in the Christchurch CBD. **Tom Barclay**, JLL's Associate Director of Research and Consulting presented his findings from a recently-commissioned piece of research, **Jane Budge**, Senior Advocacy Advisor at Property Council New Zealand presented some potential Property Council endorsed solutions to the barriers and challenges relevant to our South Island members, while **Anna Elphick** of ChristchurchNZ outlined the importance of a vibrant, liveable CBD and how ChristchurchNZ in partnership with others, is profiling, activating, attracting activity and people to the CBD.

With over 160 registered attendees, the event was very well received and has sparked a conversation into potential solutions with the primary stakeholders, particularly those under the Christchurch City Council umbrella. A further meeting was held on 1 August with both local and central government officers, to discuss initiatives to encourage residential development and ensure that momentum would continue. Property Council will continue to drive this issue forward with both local and central government elected officials to ensure your voice is heard.

In this article we explore the findings of the research report that formed that basis for this event.

What is the Christchurch Central Residential Research project?

In early 2018, Property Council's South Island Branch Executive commissioned JLL to carry out an independent piece of research to review the future of the Christchurch Central Residential property market. 22 interviews were conducted, with a focus on the developer segment of the market - those at the 'coal face' during all phases of the development process. This included representatives from the property development community, banking, public sector, architecture, engineering, academic, construction and real estate sectors.

This research aimed to answer two key questions:

1. Why has there been limited residential development in Christchurch's Central City post-quakes?
2. What can the Property Council do to promote and facilitate Christchurch Central's residential development?

Barriers to residential development

Barriers to Central Christchurch residential development were broken into three categories; major barriers, moderate barriers and minor barriers.

Major barriers

- Construction costs - cost does not equal value
- Land value - no compulsion to develop or sell
- Consenting and compliance - cost and timeframes
- Delays to Anchor Projects - doubt and uncertainty
- East Frame residential development - the "wait and see" approach
- Suburban university - a missed opportunity

Moderate barriers

- Funding restrictions - feasibility tight
- Presale requirements - 100% debt the norm
- Competition from Christchurch suburban residential
- Competition from the Waimakariri and Selwyn districts
- Urban design requirements
- Car parking - it's in our DNA

Minor barriers

- Lack of community - it will come with time
- Public transport - not an issue for CBD dwellers
- Lack of retail and amenities - on the improve
- Lack of schooling options - families not the target market
- Planning restrictions - it's the application that matters
- New neighbourhood residential zoning - a non-issue

Key drivers to residential development

During the research, some key drivers for CBD living were identified, many of which are currently deficient in the Christchurch market, resulting in limited post-quake development.

Key drivers included:

- A limited 'apartment culture' in Christchurch
- Lack of certainty makes residential development riskier for developers
- Construction costs - particularly in Christchurch where additional land remediation or specialised foundations are often required
- Price to buy - in Christchurch, there is limited price differential between houses in a number of fringe CBD suburbs and new stock in the CBD
- In other cities, people live in the CBD due to two factors - price and convenience - but in Christchurch it is possible to buy a relatively affordable house close to the CBD with a limited commute time, making the CBD purchase less attractive (particularly during the regeneration phase of the CBD, where the amenities are still to come).
- Lack of customers - while the Christchurch Central office market is now re-established, it is relatively small (~340,000 square metres) compared with Auckland and Wellington, which both exceed 1,200,000 square metres. The scope for growing the number of professionals living in the CBD is therefore limited.
- Critical mass - What drives successful apartment markets is a critical mass of end users, which is another area where Christchurch is deficient.

Property Council's position

It is our view that there are a number of opportunities to entice residents and visitors back into the central city. The immediate 'low hanging fruit' includes:

- Free car parking
- A focused and cohesive marketing campaign
- Improved public transport
- Completion of the anchor projects
- A clear strategic vision for the central city
- Incentives such as rates relief, exemptions, etc.

In the medium-term, increasing options for tourist accommodation and improving consenting processes with a dedicated CBD consenting team are both viable options.

When it comes to the big picture, incentives that encourage businesses and people to move to Central Christchurch, increasing student accommodation in the CBD, welcoming new immigrants and even thinking laterally to create staff accommodation for organisations such as the Defence Force could all be considered.

Conclusion

While several potential solutions were unearthed, the report argues that ultimately most of these are tweaking at the fringes and won't structurally change the current market dynamics - they are correct, there is no silver bullet.

The report suggests that the key focus should be on growing the end user base (demand) for CBD residential property by promoting Christchurch as the South Island's lifestyles, business, events and education hub. We need:

- More people moving to Christchurch for its affordable housing and better lifestyle (relative to the other two main cetres) and then choosing to live in the CBD rather than the suburbs
- More businesses opting to have an outpost or their HQ in Christchurch Central
- More international events coming to Christchurch, driving demand for short-stay residential accommodation and creating housing demand from the employees who host and run these events
- More students living in the CBD. Growing the number of students attending both Canterbury and Ara with a greater presence from Canterbury University in the CBD.

The aim of having 20,000 residents in Christchurch Central is unrealistic within the purported timeframes. That number is more than Wellington's CBD which only has 16,300 residents - despite having 1.2 million square metres of office stock and the university in town with over 17,000 EFTS. Christchurch Central by comparison only has around 340,000 square metres of office stock and a smaller university (12,500 EFTS) which is located in the suburbs and unlikely to move in our lifetime.

There were only 8,200 residents in the CBD pre-quakes. Reaching 20,000 is a 142% increase on this number. From today's figure of 5,860 that increase is 241%. Given the city's entire population only surpassed pre-quake levels in 2017, reaching 20,000 CBD residents is admittedly ambitious.

The key question raised is:

What reasons are there to live in the CBD in 2018 that didn't already exist in 2010?

If any substantial increase to CBD population is to be achieved, the report suggests there should be a shift in focus to supporting solutions that promote residential demand generators (CBD businesses, education providers and events), assist in the feasibility of CBD development and improve the desirability of the CBD as a place to live.

We all want an accessible, vibrant, thriving central city, a centre that welcomes visitors and embraces residents - let's create a place where people want to live, play and explore.