

SUBMISSION ON OUR SPACE 2018-2048
CONSULTATION DOCUMENT FOR THE REVIEW OF THE GREATER CHRISTCHURCH
SETTLEMENT PATTERN – NOVEMBER 2018

To: Our SPACE Consultation
Greater Christchurch Partnership
PO Box 73012
Christchurch 8154
Email: ourspace@greaterchristchurch.org.nz

Submission by: Suburban Estates Limited
Doncaster Developments Limited
Sovereign Palms Ltd

Contact Details: C/o McCracken and Associates
PO Box 2551
Christchurch

Hearing of
Submissions: The submitters do wish to be heard in support of their submissions.

1. Introduction

Suburban Estates Ltd have been in existence since 1957. Our company is one of the leading and oldest land development companies in the Greater Christchurch Area and have developed over 8000 sections in that time. We are currently developing in all 3 districts in and around Christchurch. We believe we develop land in a controlled and responsible manner and do not actively pursue the development of land if it does not fit within the parameters of sound environmental planning.

Suburban Estates Ltd (SEL), Doncaster Development Ltd (DLL) and Sovereign Palms Limited (SPL) support the need for a review of the land use planning framework for Greater Christchurch.

SEL, DDL and SPL have long been important players in the development of land in Greater Christchurch for housing and related land uses. Since the early 1990's the companies have been involved in land development, and they intend continuing this activity in the future. This experience has given them a sound basis for their opinions and land development proposals and underpins this submission. They have specific interests (and development proposals) for residential development at both Rangiora and Kaiapoi and in the case of SEL in Christchurch and Prebbleton.

This submission is in two parts. Firstly a general submission on some aspects of the proposed Update that in the view of the submitters will work against the ability of the Councils to produce a future development strategy which will deliver sufficient, feasible development capacity to support future housing and business growth. Secondly site specific submissions in relation to land at north-west Rangiora, north-east Kaiapoi and south-west Prebbleton (Refer Appendices attached).

2. General

2.1 National Policy Statement on Urban Development Capacity

PC13 of the National Policy Statement requires that a future development strategy be prepared to identify the broad location, timing and sequencing of future development capacity over the long term in future urban environments and intensification opportunities within existing urban environments (at para a).

The Update is not an RMA document, and is not required to be prepared in accordance with its provisions (in terms of its content and matters to be considered). It will nevertheless guide future changes to the CRPS and ultimately the district plans for each of Waimakariri, Selwyn District and the City Council. In that context, the RMA requires that relevant provisions of a National Policy Statement "be given effect to" by those RMA instruments. Accordingly, the Update should provide a framework within which the NPSUDC can be "given effect to". An approach to the provision of development capacity that is not consistent with PC13 (and which is arguably contrary to it) will not facilitate that outcome.

Current market demand reveals a clear preference for development within adjoining Selwyn and Waimakariri Districts. This is due to a number of actions likely to continue during the medium term, if not longer. The lifestyle preferences within the districts in comparison to urban living (particularly within the Central City) are quite distinct. The NPSUDC requires that the Councils provide for feasible development in locations where people want to live, and does not support the directive approach evident in the 'allocation' of households; in fact, that approach is inconsistent with PC13, if not contrary to it.

The targets for housing development capacity between Waimakariri, Selwyn and the City over the medium term (2018-2028) is said to be based upon a transitional approach to a change in the market and peoples preferences toward Central City and Suburban Centre locations within the Christchurch City. However, if the market response is slower than anticipated by this apportionment, there will be insufficient supply of developable land within the districts to meet the market demand.

The NPSUDC does not support the directive or coercive approach to the provision of feasible development capacity evident in the Update, which otherwise acknowledges the "slightly lower" share of growth within the City than envisaged initially by the UDS, with a higher share in the districts. The Update also acknowledges that this is due to market preferences. It is risky to take the approach that limiting opportunities within the districts will be met by opportunities within the Central City. The Councils' reliance upon a change in market behaviour within the medium term comes with some considerable risk that the NPSUDC policies will not be given effect to.

2.2 Projected Infrastructure Boundary or Urban Limits

The submitters oppose cadastrally defined, property boundary specific Proposed Infrastructure Boundary/Urban Limit lines, in a regional level strategy and in the Canterbury Regional Policy Statement, which are used to define areas which will be available for housing and other urban development. This method is in conflict with the NPS-UDC, referred to in paragraph 2.4 of the Update, which requires the “future development strategy” to identify the broad location, timing and sequencing of future development capacity in new urban environments and intensification opportunities within existing urban environments.

These PIB/UL lines have an inappropriate level of precision in a regional strategy providing an overview of future development within Greater Christchurch. The lines are both unnecessary and unhelpful. They add an inflexible additional layer to the consenting process faced by potential land developers. Land development involves multiple consent processes and layers of site investigations involving many different agencies and circumstances that are often unpredictable and subject to change. Urban Limit lines, defined at a regional level, may be unhelpful in the negotiations between developers, Councils and service supply authorities, and in achieving well managed and integrated urban growth.

In addition, the three Councils have made great progress with integrated planning for the utility systems that they are responsible for, and related funding, since the first Urban Limit lines were introduced into the Regional Planning Scheme several decades ago. The Councils are in the best position to judge whether service network extensions are feasible and desirable, in negotiation with developers and applicants. The development process needs flexibility. The process of three-yearly reviews followed by a change to the CRPS is the opposite of flexibility. The PIB/Urban Limit lines as currently prescribed are likely in some places to inhibit efficient, economic land development, and cannot be justified by a need to protect and manage the coordination of infrastructure with land development.

The Submitters ask that the Proposed Infrastructure Boundary/Urban Limit lines be removed from the Update, and from the CRPS and other planning documents.

2.3 Housing Targets and Higher Residential Density

The submitters believe that the approach adopted in preparing the Update is over directive. There is too much reliance on hoping for a future change in consumer preference to higher density housing and the redevelopment of existing urban sites rather than planning to meet the preferences of the housing market. The Update acknowledges (Section 3, Sufficiency and Sections 5 and 6) a likely housing capacity shortfall, at least in parts of Greater Christchurch. Given the reliance on a shift to higher densities it is difficult to see the Update being able to meet the requirements

of the NPS-UDC. (“Demonstrating that there will be sufficient, feasible development capacity over the medium and long term.” See section 2.4).

In this context, of probable insufficiency of supply of developable land and a household allocation model based on uncertain predictions, the inclusion of minimum targets for housing development capacity for each council, and a reliance on a move to higher density housing (which probably won't eventuate), the application of “targets” is likely to significantly under provide the development capacity that will be required.

Not all currently zoned land which CCC are relying on to be developed, will be developed. Zoned land only gets developed if a land owner does not want it to remain in its current use. Many people chose not to sell their land to developers. Also, several areas of CCC existing zoned land (including some in Redwood & Halswell) will remain undeveloped because they are TC3 and as such cannot be developed without very expensive (and usually uneconomic) geotechnical remediation.

The concept of “targets” assumes that strategic growth management is an allocative process for sharing out the predicted future households. That is the wrong approach; the goal should be to ensure adequate provision is made in all parts of the housing market. The Update should respond to the demand for housing, not try to direct it. Residential land development is a complex and dynamic process. The housing market and buyer preferences are hard to predict and slow to change and Statutory Plan provisions that attempt to force a move to higher densities of housing are likely to be resisted, or developments that would otherwise proceed may not eventuate.

SEL and other developers including Mike Greer Ltd are currently experiencing resistance to the CCC requirement of a minimum 15 lots per hectare in greenfield subdivisions. SEL predicted this at the UDS hearings but no one listened. Developers have since then embraced the 15/ha rule (because they had to) and it is apparent that many of the outcomes are poor with houses too close together. CCC seem to be unaware that many people are moving to Selwyn and Waimakairiri Districts to be away from the minimum requirement of 15/ha.

The submitters ask that the Update be amended to increase the amount of readily developable land that can be made available for development, that deferred status or staging be removed from land identified for development; and that a move to higher densities of housing be supported and facilitated but not required or directed through statutory plans. They also ask that the CRPS be changed as a matter of urgency to give effect to these requests, that the predictions and assumptions about urban growth be reviewed over the next three years, and that the patterns of development and numbers of lots created be monitored so that a future review can be soundly based.

3. Site Specific Submissions

3.1 Arlington Park Development Northwest Rangiora

Doncaster Developments are the owner of approximately 7.8 hectares of land situated at the northern end of Lehmans Road on the north-west edge of Rangiora (Refer Appendix 4). The land is on the east side of Lehmans Road, south of the Rangiora racecourse and north-west of a line of electricity transmission lines. The land is zoned for rural-residential development at a permitted density of approximately one house per 5000 square metres (Res 4A zone in the Waimakariri District Plan). It is also subject to the north-west Rangiora Outline Development Plan (District Planning Map 155). Doncaster Developments are also the developer of some of the adjacent residential land in north-west Rangiora, which includes an area of medium density and townhouse development, preschool, church and a small shopping centre.

Since early 2013 Doncaster Developments have developed a proposal to develop the subject land for housing. The development would include a mix of housing styles and densities and the development would be controlled and coordinated under an Outline Development Plan. This proposed development has been unable to proceed because the land is outside the Urban Limits set out in Map A of the CRPS. The submitters believe that the position of the Urban Limit line, excluding this land is an historical anomaly because of the rural-residential zoning and the related CRPS policies on rural-residential. However in all other respects the land is conveniently located and well suited for residential development. This submission is that the Urban Limit line is in the wrong place. This is supported by the following factors:

- The land is physically well situated to develop for housing and can be serviced. Road locations, siting limitations and servicing are provided for in the Outline Development Plan. There are no unusual infrastructure issues.
- The land is close to amenities (preschool, church) and the new shopping centre (Sandown/Huntingdon), and its development would complement recent residential developments on adjacent properties and road and reserve connections.
- The land is within 200m of the proposed public transport stop/route (Huntingdon Drive),
- The land is already zoned for low density residential development (Residential 4A),

- The land is suitable for housing and can accommodate between 120-140 residential units.
- Within the Rangiora context the land represents one of the few areas where ground conditions are geotechnically good, the land links with or is close to the popular west Rangiora growth area and can deliver home and section packages at reasonable cost.

The submitters ask that the Update be amended to include this property within the Proposed Infrastructure Boundary/Urban Limit line, (if those provisions remain) and that Map A of the CRPS be amended accordingly.

3.2 Northeast Kaiapoi

Sovereign Palms Limited have an interest in a block of land comprising approximately 26ha on the north-east edge of Kaiapoi (refer Appendix 2 and 3, yellow shaded area). It adjoins residential land recently developed by SEL. The land is within the Proposed Infrastructure Boundary/Urban Limit line but is shown as Future Development Area in Figure 16 of the Update. It is understood that the development of this land is required to be deferred to a later stage of development. SEL seeks the support of the Councils to bring forward the development date for this land so that sections can be made available to the Kaiapoi market in an economic and planned sequence to follow the developments already completed in the area.

The land is physically well suited for residential development, services connections and road links are available from the Sovereign Lakes subdivision adjoining and the land is not affected by the air noise contour. As the immediately adjacent final stage for Sovereign Lakes has only just completed, there seems little point delaying the next stage any longer. Any delays would create construction disturbance to the new home owners in that last stage of Sovereign Lakes. The public interest would not be served by delaying the start of this next stage of development.

SEL has closely monitored sales of sections in Sovereign Palms and Sovereign Lakes at this north end of Kaiapoi. They have found that purchasers prefer this location and relatively large sections. Purchasers have told SEL that they do not want to be close to a large amount of 500m² or smaller sections. SEL also think that purchasers at Sovereign Palms prefer there to Pegasus or Woodend because those towns are just a little further away from Christchurch. Kaiapoi is great community with great facilities, and there is a great community feel about it internally within the subdivision. SEL have the ability to develop at least a further 150 lots on this land, immediately to the east of Sovereign Lakes (see attached plans).

The submitters ask that the Update be amended to show the land at north-east Kaiapoi now shown as "Future Development Area" in figure 16 be changed to

“Greenfield Priority Areas – Residential”; and that the CRPS be changed so that Map A is also changed, to the same effect.

3.3 Southwest Prebbleton

SEL have developed 200 lots in Sterling Park, Prebbleton. They are currently completing stage 10 (21 lots) and then that will be all that is available in the current Living Z zone. There is potential for growth to the west, infrastructure is not difficult, road accesses from Sterling Park were required by SDC to be created and ground conditions are gravels (TC1) which are not that good for farming. Selwyn District Council have considered this land but never told us “why not”. See attached Appendix 5 which shows an area in red of approximately 35 hectares. The western half of this area could be “deferred” in accordance with demand.

Thank you for your consideration of these submissions. SEL, DDL and SPL would be prepared to join with other submitters who have similar concerns, and would be prepared to meet with Council Officers to discuss possible outcomes should that be useful in resolving these matters.

Yours sincerely,

K P McCracken
Director

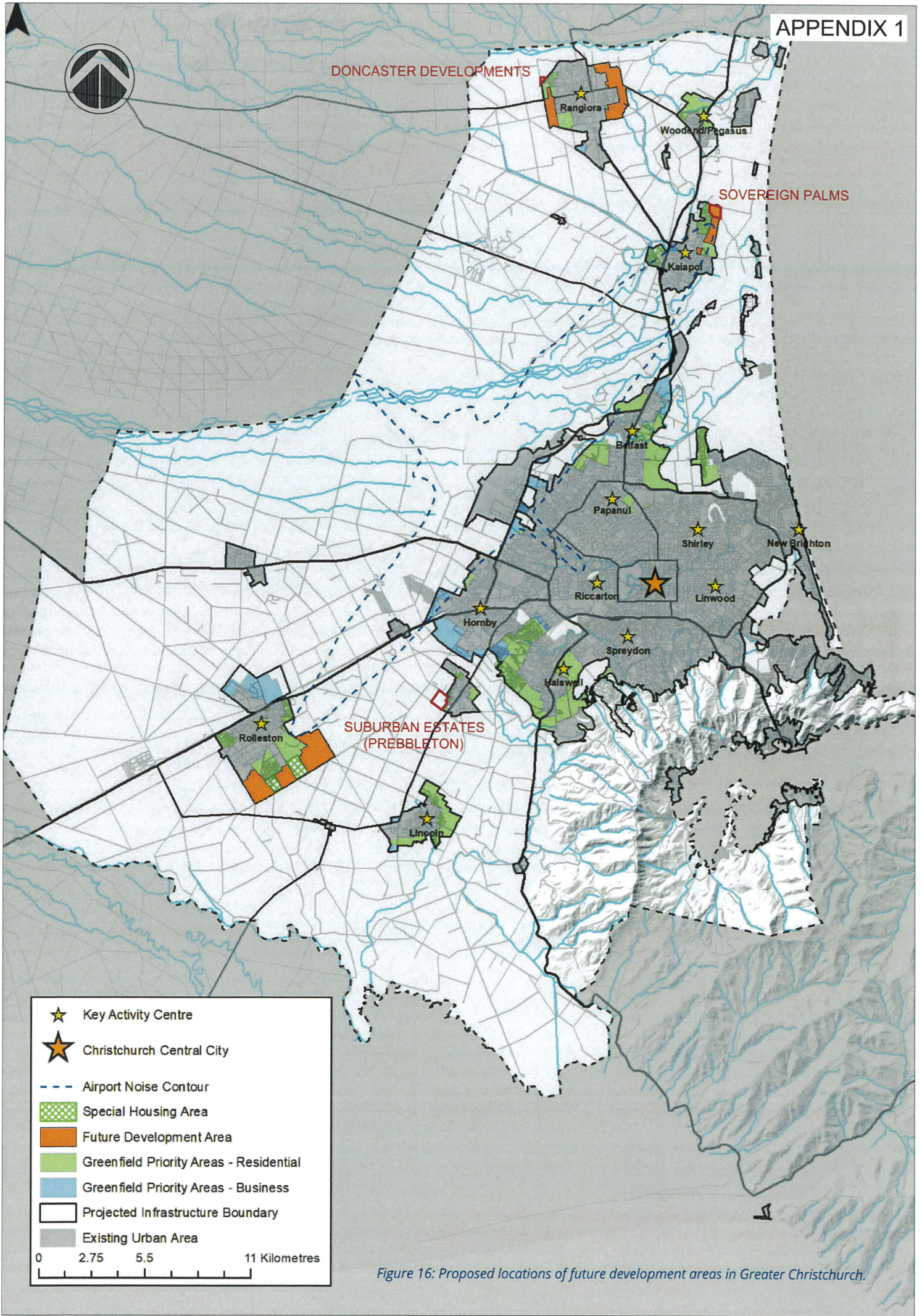
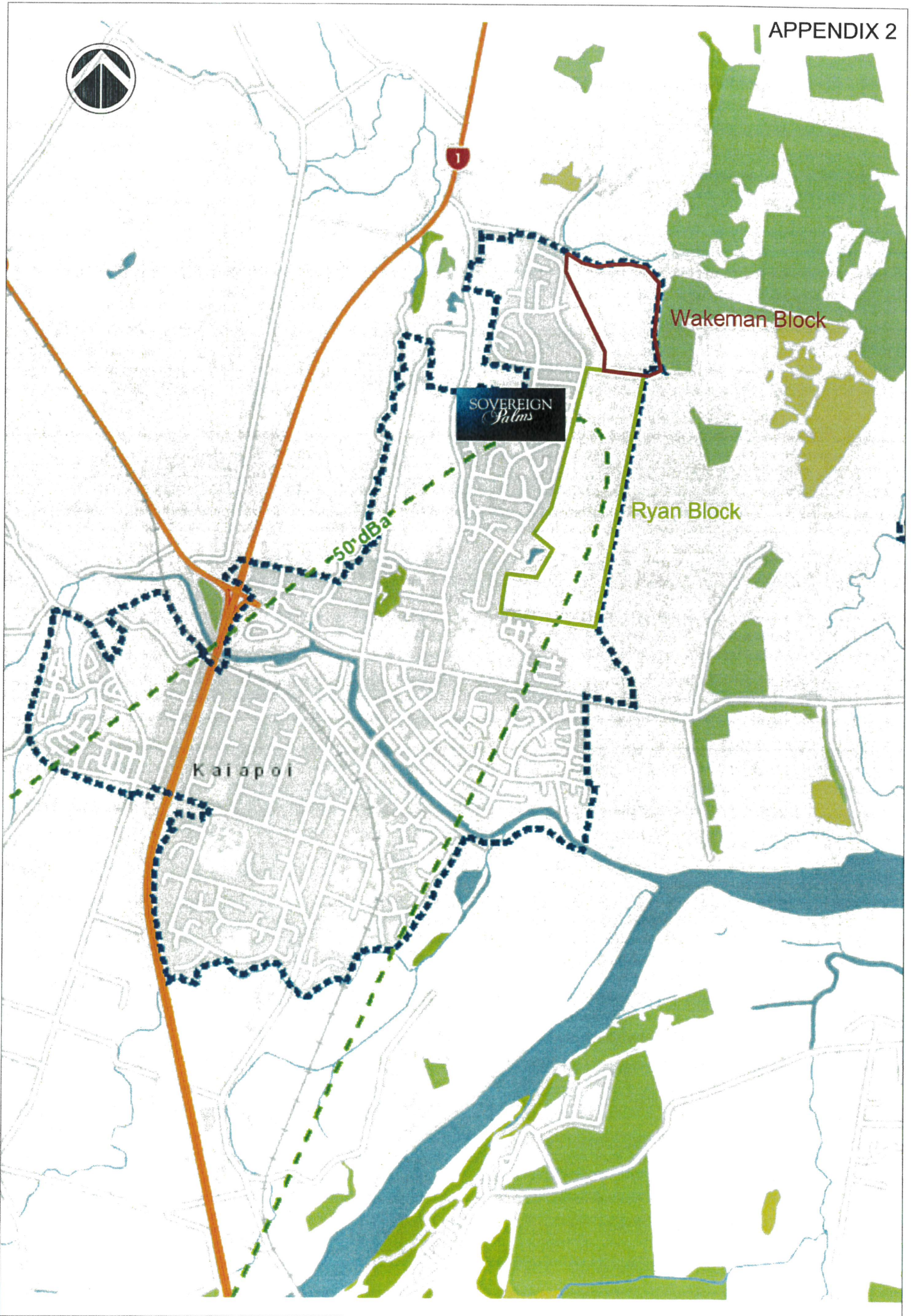





Figure 16: Proposed locations of future development areas in Greater Christchurch.



KEY

-  -Existing Pump Station
-  -Higher Sandhill area
-  -Possible Road Extension

WK1

LEES ROAD

WK2

BEACHVALE DRIVE

Existing Stormwater basins

Sovereign Lakes

WILLIAMS STREET

Sovereign Palms

Lower lying area difficult to develop

Sovereign Greens

WK2

Airport Noise Contour 50dBa

WK1

APPENDIX 4

- AREA OF DEVELOPMENT
- EXISTING BOUNDARIES
- PROPOSED ROAD DESIGN
- COMPREHENSIVE RESIDENTIAL DEVELOPMENT
- EXISTING TRANSMISSION LINES



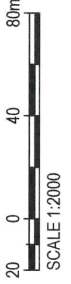
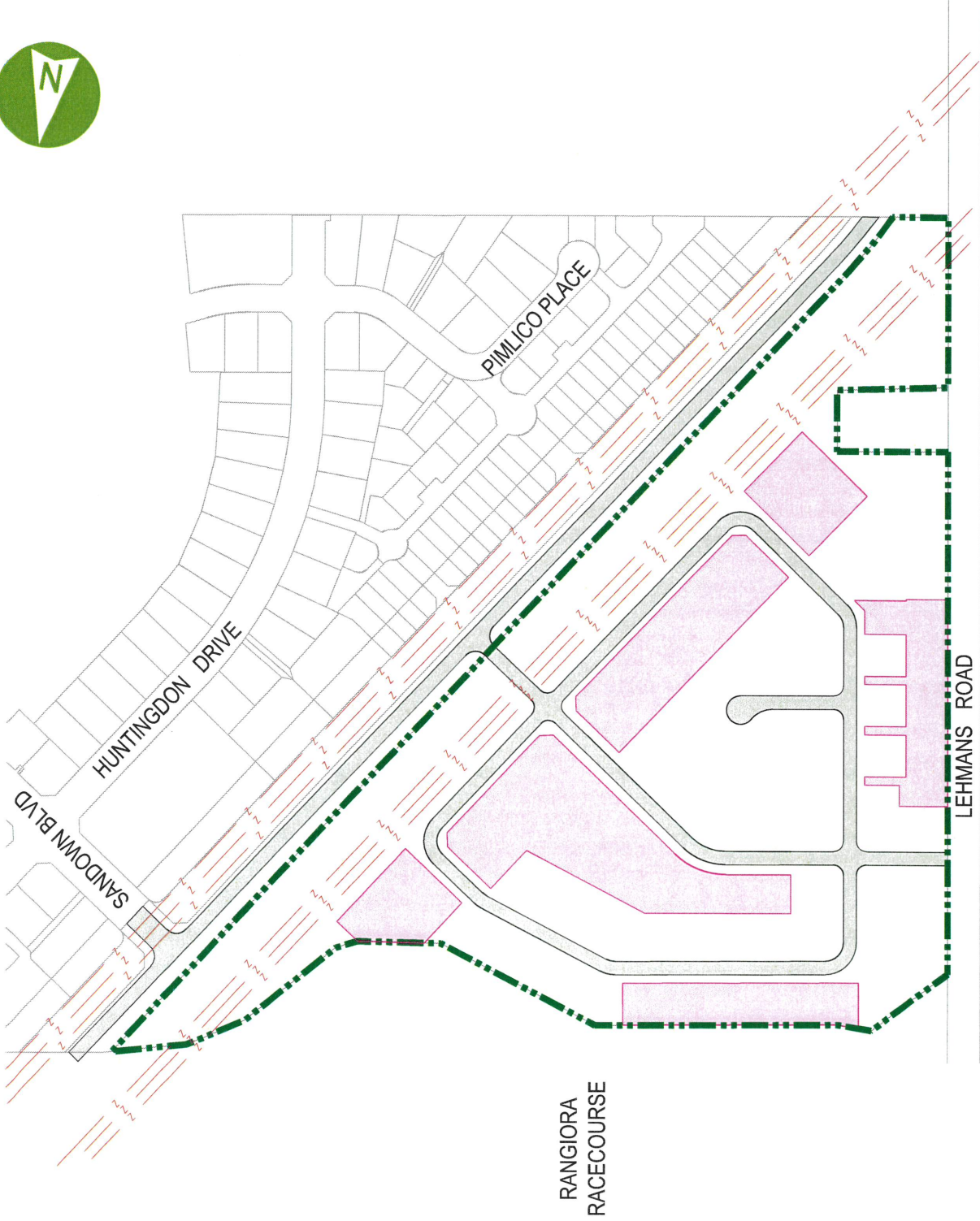
CLIENT

DONCASTER DEVELOPMENTS LIMITED

REV	DATE	REVISION DETAILS	APPROVED						
A	28/11/18	ISSUED	J TRIST						
<table border="1"> <thead> <tr> <th>SCALE</th> <th>SIZE</th> <th>PRELIMINARY</th> </tr> </thead> <tbody> <tr> <td>1/2000</td> <td>A3</td> <td>NOT FOR CONSTRUCTION</td> </tr> </tbody> </table>				SCALE	SIZE	PRELIMINARY	1/2000	A3	NOT FOR CONSTRUCTION
SCALE	SIZE	PRELIMINARY							
1/2000	A3	NOT FOR CONSTRUCTION							
DRAWN		APPROVED							
DESIGNED		DATE							
REVIEWED		28/11/2018							
J TRIST		J TRIST							

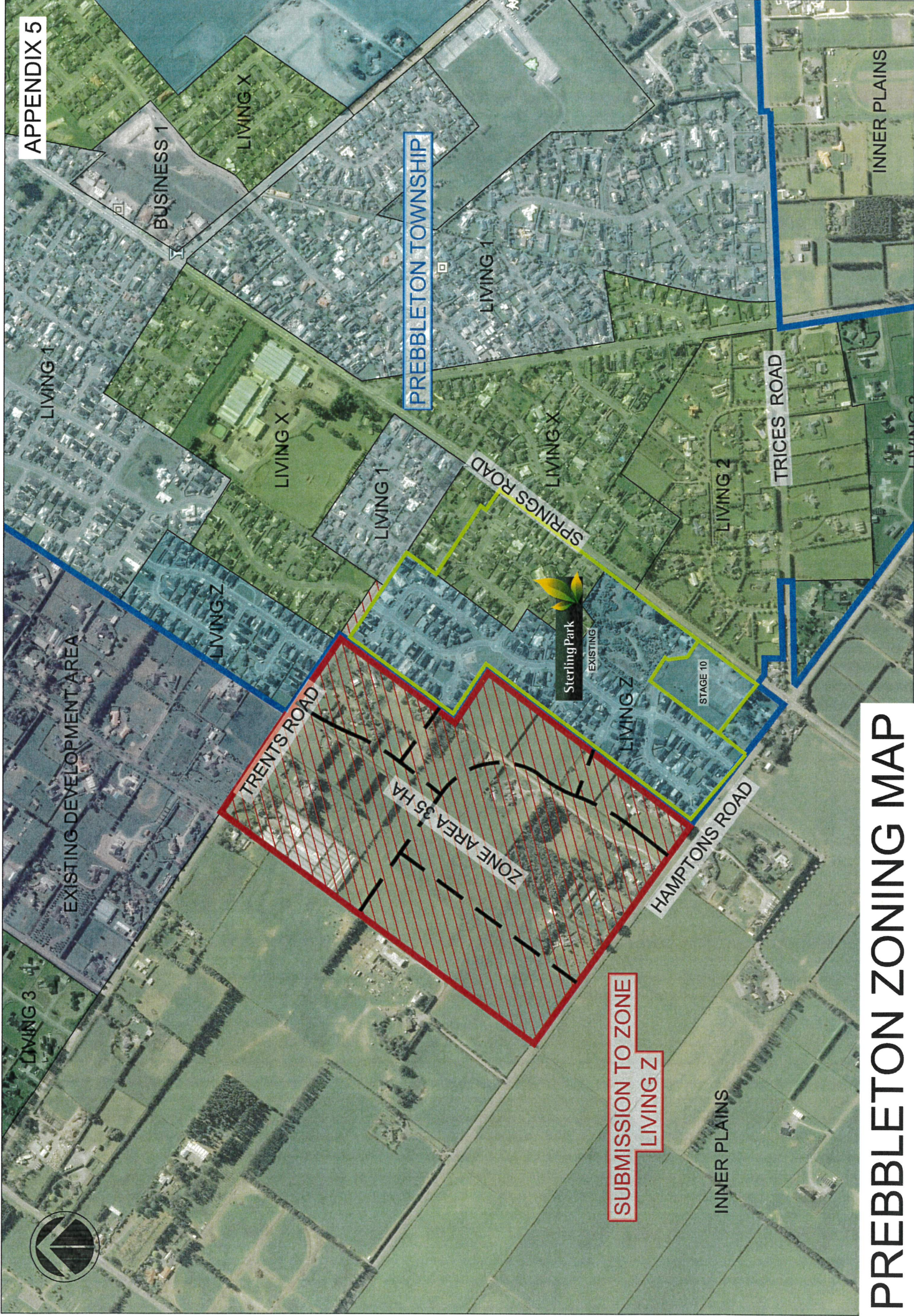
PROJECT	TITLE
ARLINGTON LEHMANS ROAD RANGIORA	PROPOSED ODP PLAN

PROJECT NUMBER	DRAWING NUMBER	SCALE	DATE
44107	0012 - DRG - 00	1:2000	28/11/2018





APPENDIX 5



PREBBLETON ZONING MAP