

16 November 2021

Committee Secretariat  
Environment Committee  
Parliament Buildings  
Wellington

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Tēnā koutou

## **Greater Christchurch Partnership submission on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill**

### **Introduction**

1. The Greater Christchurch Partnership (the Partnership) thanks the Environment Committee for the opportunity to provide comment on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill (the Bill).
2. The Greater Christchurch Partnership is a collaborative partnership in the Greater Christchurch area. The Partnership has been in existence since 2007 and is focused on the strategic integration of land use, transport and infrastructure planning in the context of intergenerational wellbeing. Members of the Partnership consist of the Councils (Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury), Te Rūnanga o Ngāi Tahu, the Canterbury District Health Board and Waka Kotahi NZ Transport Agency (as a non-voting member).<sup>1</sup>
3. Greater Christchurch is the largest urban area in the South Island and the second largest urban area in Aotearoa New Zealand, supporting 80% of the Canterbury regional population and 40% of the South Island population.
4. The Partnership commends the Government's commitment to addressing the housing crisis in Aotearoa New Zealand and is highly supportive of the aim of addressing the housing shortage by enabling the delivery of a wider range of housing options. However, the Partnership is also

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<sup>1</sup> Waka Kotahi as a crown entity is not being represented in this submission.

concerned that the provisions included in the Bill to achieve this aim are incongruous with other Government direction and the outcomes sought from these.<sup>2</sup>

5. The Partnership is also disappointed by the lack of engagement to date with local government and the residents of Aotearoa New Zealand's largest urban areas, including Greater Christchurch. The Bill, as proposed, will have significant impacts on councils' place-making, land use and infrastructure planning work, as well as on our local communities and neighbourhoods. We believe that a more collaborative partnership approach between central government, local government and iwi would support better housing outcomes.
6. In this context, this submission focuses on a few matters of particular interest and of general agreement between members of the Partnership. We note that Te Rūnanga o Ngāi Tahu, Christchurch City Council, Selwyn District Council and Waimakariri District Council are also making their own individual submissions on the Bill, which will address more technical aspects of the Bill.

### **Taking a broader well-being approach**

7. The Partnership stresses the important role of local government – in partnership with central government, mana whenua, local communities and the development sector – in providing quality, well-functioning urban environments that provide for the well-being of their people. We believe it is fundamental that the Bill is informed by and strongly delivers to the four well-beings – social, economic, environmental and cultural – to ensure that good outcomes are achieved for both current and future generations.
8. As noted above, there also appears to be a misalignment between the outcomes sought by the Bill and other Government direction and work programmes. This includes, for example, from the Government Policy Statement on Housing and Urban Development (GPS-HUD), the Government Policy Statement on Land Transport, the Emissions Reduction Plan and improving freshwater outcomes. The Partnership would value guidance from the Government about how local partners can give effect to and balance these national policy direction and priorities.
9. We also recommend that the Bill should more closely align with the place-related vision of the recently released GPS-HUD, which includes the statement that '*places should be accessible, connected, well designed and resilient*'<sup>3</sup>. The submission prepared by Christchurch City Council clearly outlines how the Bill could better align with this vision, while certain aspects of the vision are also further considered in subsequent sections of this submission.

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<sup>2</sup> For example, the Government Policy Statement on Housing and Urban Development, the Government Policy Statement on Land Transport, the Emissions Reduction Plan and improving freshwater outcomes.

<sup>3</sup> Government Policy Statement on Housing and Urban Development (page 21).

## **Supporting quality, well-functioning urban environments**

10. The Partnership supports the principle of providing increased opportunities for more intensive developments in Aotearoa New Zealand's largest urban areas, which aligns with our current strategic direction for a consolidated urban form in Greater Christchurch that is achieved by intensifying and redeveloping our existing urban areas. However, we are also concerned that the ability for councils to effectively provide for growth and support quality, well-functioning urban environments will be greatly undermined by some provisions in the Bill.
11. In particular, the application of the medium density residential standards (MDRS) across our urban areas in Greater Christchurch will be problematic as it will likely result in increased residential density in locations that lack suitable accessibility for our communities, and in locations where there is little or no capacity in wastewater, storm water and drinking water networks, or where capacity cannot easily be increased.
12. The plans and strategies that currently provide the direction for growth in Greater Christchurch, such as the Greater Christchurch Urban Development Strategy, Our Space 2018-2048, the Canterbury Regional Policy Statement (CRPS), and the district plans for Christchurch City, Selwyn District and Waimakariri District, purposefully locate increased residential development around areas where there is current or planned infrastructure capacity to service intensified development.
13. The Partnership supports a more targeted approach to intensification in accessible locations – where there are a range of attributes contributing to a quality, well-functioning urban environment. This includes where there is access to public transport, connections to schools and other social and community infrastructure, and proximity to local parks and open space. Enabling development in areas without public transport connections, and potentially some distance away from services and amenities, will undermine our work to improve the uptake of public and active transport, and reduce emissions from transport.
14. The Partnership suggests that councils should have the ability to ring-fence areas where there are limitations to infrastructure capacity from the provisions of the Bill. Of particular concern is the ability for councils to provide for the management of storm water in some existing urban environments, both in terms of water quantity and ensuring it is adequately managed so that it does not result in the deterioration of water quality and biodiversity outcomes.
15. The Partnership supports the scope that exists in the Bill to consider Qualifying Matters that could influence the application of the proposed standards where there are concerns around natural hazards or the impact on heritage.
16. The Partnership notes that development covenants could act as a barrier to intensification in Greater Christchurch and other large urban areas in Aotearoa New Zealand, precluding the outcomes sought by this Bill from being achieved. We note the Regulatory Impact Statement recognises that further work on this issue is required and we encourage the Government to promptly give this issue its attention.

17. Overall, the Bill will reduce the ability of councils to target specific areas for development as to achieve integrated management of development and infrastructure provision, and support quality, well-functioning urban environments. This includes reduced ability to encourage a critical mass of people and activities to promote the feasibility of new, larger infrastructure investments, such as the mass rapid transit being explored in Greater Christchurch.

### **Māori owned land**

18. The Bill makes no specific provision for expediting the development of Māori owned land. More specificity within the Bill providing for housing on Māori owned land, within and outside of urban areas, would provide the necessary policy platform for mana whenua to springboard housing developments with fewer policy and consenting barriers.

### **Ensuring our places meet urban design standards**

19. The Partnership strongly considers that the Bill must balance the need for increased residential density and the delivery of affordable homes with good urban design to ensure we create liveable urban environments. The Bill, as proposed, does not include any design standards, which we are concerned will result in poor urban design outcomes. We recommend that robust design standards are introduced into the Bill that considers factors such as the New Zealand Urban Design Protocol.
20. We are also concerned by the omission in the Bill of minimum landscaping requirements for residential developments. Trees and planted open spaces play a vital role in climate change mitigation, contributing significantly to biodiversity, air quality and cultural recognition, and helping to create more attractive streets and neighbourhoods. We are concerned that the MDRS could lead to the further reduction in tree canopy cover, which cannot readily be offset by planting trees in public space and therefore suggest that a standard requiring a percentage of a site's area to be landscaped and a specified percentage to be for trees be included.
21. The Bill also omits any requirements for setbacks from water bodies. The Partnership strongly requests that waterway setbacks are included in the Bill, including for wetlands and estuary edge areas. To better protect waterways in Aotearoa New Zealand's largest urban areas from catchment modifications, a waterway corridor of generous width should be protected.

### **Requiring a minimum density of development**

22. The Partnership notes that under the MDRS there is currently no ability for councils to require minimum densities of development. This undermines the current direction in the CRPS, which sets minimum density requirements for greenfield residential development in Greater Christchurch. The Partnership requests that minimum density requirements be included in the MDRS for residential development within Greater Christchurch's statutory area<sup>4</sup> that are aligned with the requirements in the CRPS.

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<sup>4</sup> As depicted in Map A in Chapter 6 of the Canterbury Regional Policy Statement (page 92).

### **Clarifying the framework for collecting Financial Contributions**

23. The Partnership broadly supports the provisions included in the Bill to collect Financial Contributions from developers to support residential development, but requires more clarity about the framework for charging and the timing implications. The timing of Financial Contributions provisions needs to align with the other aspects of the Bill that will have immediate legal affect from August 2022.

### **Clarifying the geographic scope of an “urban environment”**

24. The geographic scope of the Bill is unclear because of the broad definition of the term “urban environment”. The Partnership is concerned that this will enable residential development in small towns and settlements across the three districts that have jurisdiction over Greater Christchurch – Christchurch City, Selwyn District and Waimakariri District – which we do not believe meets the intent of the Bill. We therefore require clarification of the geographic scope of the Bill and suggest that the boundary for Greater Christchurch should align with the established statutory area<sup>5</sup> for Greater Christchurch, noting the exception raised in paragraph 18.

### **Closing remarks**

25. Thank you for the opportunity to provide this submission. The Partnership would like to be heard in support of this submission.
26. For any clarification on points outlined in this submission, please contact our Secretariat at [secretariat@greaterchristchurch.org.nz](mailto:secretariat@greaterchristchurch.org.nz)

Nāku, nā



**Jim Palmer**

Greater Christchurch Partnership Independent Chair

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<sup>5</sup> As depicted in Map A in Chapter 6 of the Canterbury Regional Policy Statement (page 92).