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## INTERIM DRAFT APPENDIX 1 FOR THE PURPOSES OF FURTHER DELIBERATIONS BY THE HEARING PANEL ON 29 APRIL 2019

This section provides the Hearing Panel's recommendations on each of the 92 individual submissions received on Our Space.

We have adopted the summary of the officers' submission points for ease of use but advise that each submission has been read by the Hearing Panel. Our recommendations on submission points below should be read in conjunction with our recommendations report.

Where we have accepted the recommendations of officers we have agreed with and adopted the reasoning of officers, unless otherwise expressly stated.

### ***Lloyd Bathurst (001)***

Notes there is significant housing development capacity available in Rolleston and would prefer a projections-led approach to housing targets to allow people to live where they want to live.

#### **Hearing Panel discussion and recommendation:**

We are satisfied that the officers' explanation in Section 4 of the report in relation to Themes 1 (accuracy and uncertainty of projected demands) and 4 (Need for further greenfield areas, including specific sites in each district) addresses this matter.

We note that Table 3 sets out the sufficiency of housing development capacity in Greater Christchurch in each of the territorial authority areas. We consider it is appropriate to enable the territorial authorities to determine appropriate locations for development depending on their ability to provide and plan for infrastructure. This provides certainty for developers as to which land will be released, providing a clear signal as to where to allocate resources to provide for development. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood.

We considered Mr Bathurst's submission and presentation to us, in particular with reference to not identifying areas of land subject to earthquake hazard risk (such as liquefaction), which we address below. We recognise that the development of some types of land in the region will have an impact on insurance premiums, however we also acknowledge that in the development of vacant land, ground and foundation design can ameliorate the impacts of earthquakes and reduce risk. We do not consider that, at this stage, substantial additional land needs to be released to address a shortfall in greenfield land at Rolleston.

In relation to rural residential land, the Canterbury Regional Policy Statement sets out a framework for consideration of these areas, and requires them to be included in a rural residential strategy in the case of Waimakariri or Selwyn District, or in the case of Christchurch City, no provision is made for further new rural residential land.

In summary, along with the matters we note above, we accept the officers' position on this submission and no changes are recommended in relation to the submission for the reasons set out above.

Notes that liquefaction and earthquake risk factors are not shown on the Natural Hazards map (Figure 10, p.17).

**Hearing Panel discussion and recommendation:**

Officers addressed the extent to which natural hazards information is covered in Our Space in their Reply Report and recommend amendments to section 4.1 to clarify the scope and purpose of Figure 10.

No expert evidence was provided to us by the submitter regarding the constraints that land has in terms of its development or what the economic costs of that may be, apart from anecdotal evidence regarding the cost of insurance excesses for commercial property. As such, we do not consider that the presence of geotechnical constraints forgoes the ability for land to be developed. We accept the officers' position that only hazards that significantly influence decisions on where new urban development should locate are included. In particular, we note that the Canterbury Regional Policy Statement does not seek to avoid development in areas that may be subject to liquefaction, which is the case for new urban development in High Hazard Areas, for example.

We accept the officers' recommendation to amend Section 4.1 to clarify the purpose and scope of the hazard constraints map.

**Floyd Rudolph (002)**

Promotes industrial hemp farming, particularly for Christchurch red zone areas, and community blockchain.

**Hearing Panel discussion and recommendation:**

We accept the officers' comment that such matters are outside of the scope of Our Space, and that the use of the Residential Red Zone is the subject of another planning process.

No changes are recommended as a result of this submission point.

Supports bus lanes, and subsidised e-bikes, scooters and longboards that can go on buses for last kilometre travel.

**Hearing Panel discussion and recommendation:**

We note the submitters point. Officers responded that the operation of the public transport network is outside the scope of Our Space, and we accept this response.

No changes are recommended as a result of this submission.

**Scott Boyce (003)**

Unsure of the information available for the timing of the future development areas in Selwyn.

**Hearing Panel discussion and recommendation:**

Officers referred to the recommendations outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. In relation to this they recommend that sequencing is identified as part of structure planning processes and infrastructure servicing, which is best determined by the relevant territorial authorities. They noted that such processes would need to have regard to existing Canterbury Regional Policy Statement policy provisions, and recommended wording amendments to clarify this.

We accept the officers' recommendations on these matters, and accept the submission in part to the extent that the changes outlined in Theme 5 of the officers' report are made clarifying that sequencing will be addressed in the manner described.

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### **John Dryden (004)**

Queries why there is no discussion of the cultural aspirations of the majority of people who live in Christchurch.

**Hearing Panel discussion and recommendation:**

Officers referred to the vision, principles and strategic goals of the Urban Development Strategy for Greater Christchurch which is still relevant, and are reflected in section 2.3 of Our Space.

We accept the officers' position that no changes are necessary, and as a result, no changes are recommended as a result of this submission point.

Considers that the intensification of residential areas will fail unless good urban design principles are enforced.

**Hearing Panel discussion and recommendation:**

Officers referred to their recommendation outlined in Section 4 in relation to Theme 7 (*Poor intensification outcomes and preferences to focus intensification in the Central City*) in the officers' report. This notes that Christchurch has many examples of high-quality residential intensification, and that these matters are best dealt with at a territorial authority level. We accept this and further note that Christchurch has recently been through a district plan review which addresses design matters comprehensively, and that Selwyn and Waimakariri District Councils are about to embark on their reviews.

We accept the officers' position that no changes are necessary. No changes are recommended as a result of this submission point.

### **Drucilla Kingi-Patterson (005)**

Identifies upcoming and proposed events across New Zealand, and considers that hosting such major events could affect how Greater Christchurch should develop.

**Hearing Panel discussion and recommendation:**

We heard from Ms Kingi-Patterson on these matters.

We accept the officers' position that such matters are outside of the scope of Our Space, the purpose of which is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the strategic directions of the Urban Development Strategy. We accept the NPS-UDC does not require local authorities to consider the implications of major events on the approach to urban development.

No changes are recommended as a result of this submission point.

Concerned that new development will affect civil defence zones and food producing farmland.

**Hearing Panel discussion and recommendation:**

Officers refer to the recommendations in the officers' report in Section 4 in relation to Theme 3 (*Protecting productive, agricultural and high quality soils from urban expansion*). They note that the review of the Canterbury Regional Policy Statement and district plans may need to consider the implications of a new National Policy Statement on Versatile Soils, which is being planned. There will be some existing areas that are already identified for development on versatile soils in the Greenfield Priority Areas of the Canterbury Regional Policy Statement.

In relation to evacuation zones in Greater Christchurch, officers noted that specific civil defence matters are the responsibility of the Canterbury Civil Defence Emergency Management Group and are therefore out of scope for Our Space.

We accept officers' position that no changes are necessary, and no changes are recommended as a result of this submission point.

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Highlights the need for elderly care developments and suitable accommodation for people with disabilities, as well as affordable housing for people affected by shifting employment and workforce dynamics.

**Hearing Panel discussion and recommendation:**

Officers referred to Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*) of the officers' report. They noted that Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded. The said that Our Space does not limit the potential for appropriate innovative housing options, and that these matters can be addressed through district plan reviews.

We accept the officers' position that no changes are necessary, and no changes are recommended as a result of this submission point.

Notes the need for light rail between Amberley and Ashburton, and Lincoln and the Central City.

**Hearing Panel discussion and recommendation:**

Officers referred to the recommendations outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*) in the officers' report. They note that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

No changes are recommended as a result of this submission point.

**Robert and Margaret Spark, and Richard and Dawn Spark, Spark Bros Ltd (006)**

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development.

**Hearing Panel discussion and recommendation:**

We heard from Mr Geoff Spark in relation to this submission. He noted some features of the additional land he was seeking to be included as a greenfield priority area., including that it was close to proposed light rail, the town centre, the Southbrook Industrial Area and road links to Christchurch. Officers referred to their recommendations outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report. Officers concluded that they do not consider that additional land proposed by submitters is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

We note that in relation to other submissions seeking extensions to the urban area, the officers considered that the land is best considered as part of subsequent RMA planning processes, including changes to the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including spatial planning. We consider this is an appropriate consideration in respect of this submission.

We acknowledge support for the existing identified Greenfield Priority Areas on the land, but make no changes to those other areas identified by the submitter.

No changes are recommended as a result of this submission point.

**Peter Wells (007)**

Concerned about the impacts of greenfield development on arable and ecologically valuable land, the cost of extending infrastructure, the increased social isolation and the ability to achieve zero carbon goals.

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*), 3 (*Protecting productive, agricultural and high quality soils from urban expansion*), 10 (*Provision and*

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*protection of key infrastructure, and integration with development*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*) in the officers' reports.

We generally accept the officers' position on those matters, however we consider a further response with regard to addressing climate change, achieving sustainability and zero carbon goals is required. We consider this issue merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of Our Space, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

Supports new forms of housing that help build closer communities and introduce more sustainable solutions.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 9 (*Provision of social and affordable housing, and a range of housing types*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*) of the officers' report. As above, we recommend changes to give a greater focus on sustainability in Sections 4 and 5 of Our Space.

Considers that commercial developments should be focused in existing centres and should help to create quality, adaptable and liveable urban environments.

**Hearing Panel discussion and recommendation:**

Officers referred to Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) of the officers' report. This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation on this and to that extent, accept the submission point in part.

Notes support for rail services, and the opportunities this would offer for urban regeneration and revitalisation.

**Hearing Panel discussion and recommendation:**

Officers referred to Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*).

The submission point is noted. The option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

No changes are recommended as a result of this submission point.

Considers that the existing three waters systems is already at capacity and susceptible to disruption, especially in the face of climate change, and that new innovative infrastructure systems could be explored.

**Hearing Panel discussion and recommendation:**

Officers referred to recommendations outlined in Section 4 in relation to Themes 10 (*Provision and protection of key infrastructure, and integration with development*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*). They noted that while Our Space does not preclude opportunities to explore the use of innovative infrastructure systems, this is most appropriately considered by councils at the individual territorial authority level.

We accept the officers' position, and no changes are recommended as a result of this submission point.

**John Ascroft (008)**

Supports more emphasis on cycling and walking, and less on cars and buses, especially in the Central City.

**Hearing Panel discussion and recommendation:**

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Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*). They noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.

We accept the officers' position, and no changes are recommended as a result of this submission point.

### **Bellgrove Family Trust (009)**

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

#### **Hearing Panel discussion and recommendation:**

We heard from Ms Murdoch, counsel for Bellgrove Family Trust, in relation to this submission. The trustees support the identification of their land as a Future Development Area in Our Space (considered to be the logical next step for development of the land) which is located east of Rangiora High School and is land that could be serviced. The trustees also seek identification as a Greenfield Priority Area as it can be reasonably anticipated that the medium term, through to 2028, will have well progressed before any zoning is determined. It was submitted that if the Panel determined that the land remain as a Future Development Area, amendments are required to the wording of Section 9 Action 8 which relates to changes proposed for the CRPS. In response to questions, Ms Murdoch recognised that the streamlined process, having not identified any particular issues or likely opposition to the zoning of the land, could potentially happen quite quickly.

The trustees also seek a change to the Projected Infrastructure Boundary to follow cadastral boundaries on the site.

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) of the officers report. Officers concluded that they do not consider additional land proposed by the submitter is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

Officers have generally recommended that additional land is best considered as part of subsequent RMA planning processes, including changes to the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including spatial planning. It is proposed that a change to Chapter 6 of the Canterbury Regional Policy Statement be progressed using the streamline planned process under the RMA to ensure that future development areas necessary to meet development capacity needs can be rezoned as part of the upcoming district plan reviews.

We note that only those areas that are already identified in the Canterbury Regional Policy Statement as Greenfield Priority Areas are identified as such in the Our Space document. Officers provided an explanation on this as party of their Reply Reply. We accept those reasons and agree that it is not appropriate to change areas that are identified as Future Development Areas to Greenfield Priority Areas in Our Space.

No changes are recommended as a result of this submission point.

Considers that deferring decisions on when the identified future development areas may be developed until the District Plan Review stage could risk adding delays and uncertainties.

#### **Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) of the officers' report. We accept the officers' position and again note that the proposed change to Chapter 6 of the Canterbury Regional Policy Statement will enable future development areas necessary to meet development capacity needs to be rezoned.

No changes are recommended as a result of this submission point.

Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.

**Hearing Panel discussion and recommendation:**

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) of the officers' report. At present, they consider there are significant uncertainties regarding future demand, which is why monitoring and refinement of Capacity Assessments will take place over time.

We accept the officers' positions that the projections and targets are appropriate, and no changes are recommended as a result of this submission point.

**David Hawke (010)**

Supports the focus on redevelopment in Christchurch and highlights the negative externalities of recent greenfield expansion in Halswell, including the loss of versatile soils, diminished liveability and increased traffic congestion.

**Hearing Panel discussion and recommendation:**

We heard from Mr David Hawke in relation to his comprehensive submission.

Mr Hawke told us he bikes to work, and has appreciated some of the changes the Accessible City has brought, and is an example of some of the sustainability outcomes that Our Space is intended to bring. He said the default is endless spreading, increasing costs, and social inequality. He strongly supports central city development, and tightly controlled outer limit, and a focus on versatile soils.

He asked the Panel to stay strong in relation to requests to extend the urban boundary. The reason for this is related to his experience in Halswell, where development has spread on to high quality land. The layout in Halswell relies on cars to get around, with difficulties get buses through the suburb. Even so, Halswell still probably meets the '10 minute neighbourhood' concept. He noted that Knight's Stream has a higher density than would normally take place, and that it is working with a steady building of community.

He said that Our Space is a good opportunity to include guidelines to fulfil the vision of the strategy. He reiterated how the 10-minute neighbourhood is not necessarily a pleasant experience and accessible to all, and that this needs to be fleshed out. He discussed the idea of being 8-80 accessible, and that this would also achieve transport outcomes. He considered exemplars would also be beneficial.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) of the officers' report.

In relation to Mr Hawke's submission and presentation, we note the submitter's references to the negative externalities of recent greenfield development. We consider that with the amendments recommended by Officers, Our Space addresses these concerns.

No changes are recommended as a result of this submission point.

Supports the focus on greenfield development in Rolleston, Rangiora and Kaiapoi, but considers that this land should be developed at a significantly higher density than currently achieved.

**Hearing Panel discussion and recommendation:**

Mr Hawke said that that provision of greenfield land around Rolleston and Rangiora rather than Christchurch was acceptable, but that more guidance was needed on how that development should take place. In relation to the new bits of Rolleston, it is his view that it looked like urban sprawl again.

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) and 4 (*Need for*

*further greenfield areas, including specific sites proposed in each district*) of the officers' report. Officers did not support referencing a new minimum density for these areas in Our Space, but did consider that further work should be signalled regarding minimum densities for the 2022 Canterbury Regional Policy Statement review.

We have considered a wide range of submitter views on this matter, and carefully considered that in relation to Future Development Areas, there is the possibility of a policy 'gap' in terms of minimum densities. Christchurch City Council considered that 15 households per hectare in Rolleston, Rangiora and Kaiapoi would be appropriate. We heard from a number of developers who considered that 12 households per hectare was reasonably achievable, while others considered 10 households per hectare provided flexibility. We heard from others again who considered that lower densities might be required because of the presence of TC3 land.

We consider that it is appropriate that we signal a *minimum net density of 12 households per hectare* for residentially zoned land in those parts of the Selwyn and Waimakariri districts falling within the Greater Christchurch area, noting that further evaluation will occur as part of the review of the Canterbury Regional Policy Statement in 2022. We are satisfied that in the mix of evidence received during the hearing, such a statement is both necessary and appropriate.

To this extent, the submission is accepted.

Notes the need for mixed developments that provide a range of social, affordable and market housing types.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*) of the officers' report.

The submitters point is noted, no changes are recommended as a result of the submission.

Considers that commercial developments need to be aligned with sustainable transport options and that there is sufficient industrial land, particularly in Hornby and Rolleston, to support future growth.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (*Transport needs and implications, including for public and active transport*) and 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) of the officers' report. This was also addressed in the reporting officers' reply report (question 9). They noted the Capacity Assessment identified a significant over-supply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 of Our Space outlines these findings.

No changes are recommended as a result of this submission.

**Randal Inch (011)**

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) of the officers' report. Officers concluded that they do not consider that additional land proposed by submitters is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch.

We accept the officers' position and no changes are recommended as a result of this submission point.

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Considers that deferring decisions on when the identified future development areas may be developed until the District Plan Review stage could risk adding delays and uncertainties.

**Hearing Panel discussion and recommendation:**

Officers have generally recommended that additional land is best considered as part of subsequent RMA planning processes, including changes to the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including spatial planning. We note that the proposed change to Chapter 6 of the Canterbury Regional Policy Statement will enable future development areas necessary to meet development capacity needs to be rezoned.

We accept the officers' position and no changes are recommended as a result of this submission point.

Considers that a high growth projection scenario would be more appropriate for Waimakariri given recent trends.

**Hearing Panel discussion and recommendation:**

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). In summary, they said that there are significant uncertainties in determining future demand. This is reflected in the NPS-UDC requirements for ongoing monitoring and review of projections and targets as part of periodic capacity assessments. Officers said that subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ in 2020.

We accept the officers' position and no changes are recommended as a result of this submission point.

**Pat McIntosh (012)**

Highlights the need to plan for sustainability and improved environments, and not allowing urban sprawl that encroaches on productive farmland, creates higher travel costs and reduces the sense of community.

**Hearing Panel discussion and recommendation:**

Officers referred to recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*), 3 (*Protecting productive, agricultural and high quality soils from urban expansion*), 6 (*Transport needs and implications, including for public and active transport*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*) in the officers' report.

Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, and the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.

Identifies rent-to-buy schemes, shared equity and building higher density housing on brownfield sites as potential elements of a social and affordable housing action plan.

**Hearing Panel discussion and recommendation:**

<p>Officers referred to comments and recommendation outlined in Section 4 in relation to theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>) of the officers' report.</p> <p>They did not recommend additional changes in the officers' report, but as part of their reply, they included a timeframe for the development of the action plan. The matters addressed above will explore a number of different options in terms of providing for social and affordable housing.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point, however noting the officers' recommendations to include a timeframe for an action plan in Action 2 of Section 2.6</p>
<p>Considers that the projected growth is mostly related to immigration, which is politically controlled and unlikely to continue at the current rate, and that this approach is responsive rather than value-led.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 1 (<i>Accuracy and uncertainties of projected demands</i>).</p> <p>They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>

**Andrew Long (013)**

<p>Disagrees with housing growth in the towns as they have an insufficient business and employment base to support such populations, meaning growth will lead to more commuter car trips and reduced sustainability outcomes.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (<i>Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts</i>), 6 (<i>Transport needs and implications, including for public and active transport</i>) and 11 (<i>Addressing climate change, and achieving sustainability and zero carbon goals</i>).</p> <p>The Capacity Assessment identifies sufficient provision in the Selwyn and Waimakariri District Plans to meet the demand for industrial land over the long term, and for the most part, commercial space over the medium term. Section 3.3 of Our Space outlines these findings. Whilst acknowledging there will always be commuting between the towns and major employment areas in Christchurch City, Section 5.3 (p. 24) and Section 6.4 (p. 35) notes that improving the self-sufficiency of relevant towns is a key consideration of the district councils.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Considers that social and affordable housing should be located close to shops and services, and spread across Greater Christchurch.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers referred to comment and recommendations outlined in Section 4 in relation to Theme 9 (<i>Provision of social and affordable housing, and a range of housing types</i>) of the officers' report.</p> <p>The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. This action plan is covered in Section 5.1 (p. 20) and Section 6.2 (p. 33) of Our Space.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Considers that office space at the airport should be capped to encourage development in the Central City.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p>

Officers referred to comment and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*). In addition, we note that this is a matter that could be addressed as part of the review of the Canterbury Regional Policy Statement in 2022. The Christchurch District Plan gives effect to Policy 6.3.8 of the Canterbury Regional Policy Statement which aims to limit impacts on Key Activity Centres and the Central City.

We accept the officers' position that no changes are recommended in response to this submission point.

Concerned that the costs associated with delivering rapid transit would disproportionately fall on Christchurch City Council ratepayers and that the phasing of traffic signals in Christchurch disrupts and slows traffic.

**Hearing Panel discussion and recommendation:**

Officers told us that such matters are out of scope for Our Space. The Greater Christchurch Future Public Transport Business Case will investigate the opportunity for rapid transit corridors in Greater Christchurch, including any appropriate delivery and funding arrangements. Traffic management issues in Christchurch City are the responsibility of the Christchurch City Council, and addressed through other processes and mechanisms.

We accept the officers' position that no changes are recommended in response to this submission point.

Notes that few hazards are identified in Selwyn and Waimakariri on the Natural Hazards map (Figure 10, p. 17).

**Hearing Panel discussion and recommendation:**

Officers acknowledged that the purpose and scope of this map, as well as other constraints maps in Figure 10, could be clarified in Our Space. We accept the officers' recommendation to amend Section 4.1 to address the submission to clarify the purpose and the scope of the natural hazard mapping.

**Michael Steadman (014)**

Highlights the need to protect high quality soils to retain the ability for low-carbon, self-sustaining food production.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 3 (*Protecting productive, agricultural and high quality soils from urban expansion*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*) in the officers' report.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.

Supports higher density housing developments along transport corridors and considers that growth in the towns should only occur once rapid transit is in place.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 5 (*Sequencing and staging of greenfield land*) and 6 (*Transport needs and implications, including for public and active transport*). They said that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to Map A of the Canterbury Regional Policy Statement in 2019 as a result of Our Space).

We accept officers' recommendations to include wording in Our Space (Section 5.5 and Section 6 Action) to make it clear that detailed structure planning to determine the sequencing of future development areas will

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need to have regard to existing Canterbury Regional Policy Statement provisions to ensure a consolidated urban form, proximity to key activity centres, efficient infrastructure, and cohesion of new development with existing communities.

We also accept officers' recommendations to include wording in Our Space (Section 5.5 and Section 6 Action 8) to outline the intent of draft policy provisions to be considered in the 2022 review of the Canterbury Regional Policy Statement to demonstrate how future development areas are sequenced by territorial authorities in accordance with housing targets incorporated in the Canterbury Regional Policy Statement and sufficiency conclusions agreed as part of periodic capacity assessments.

### **Cashmere Park Trust (015)**

Landowner seeks the inclusion of land (within the PIB) on Leistrella Rd, Christchurch for future development.

#### **Hearing Panel discussion and recommendation:**

Mr Warren Lewis presented to us in relation to the submission of Cashmere Park Trust<sup>1</sup>, for whom he is a trustee. Mr Lewis described the land as the closest rural land to the city centre, surrounded by zoned land which provides for 15 households per hectare, however the Trust's land is constrained to 4 hectare sites. The land forms part of the Henderson's Basin. Mr Lewis advised that only 20% of the land has ever been flooded, and that which was flooded was due to a blocked culvert. He described the Trust's desire to subdivide the land, through compensatory storage within Henderson's Basin. Mr Lewis was concerned that flood modelling by the CCC after the earthquake did not align with the changes in ground levels post-earthquake. He emphasised the presence of infrastructure, and that the site was not affected by climate change due to its elevation.

Officers do not support the inclusion of additional development in the Hendersons Basin area, on the basis that there is sufficient land available within the existing Christchurch area to cater for greenfield growth. We have considered the submitters request, and note that in relation to the land, we have not received expert evidence on the matter of flooding and flood heights, either from the submitter, or the Christchurch City Council. We do note that the Christchurch City Council, in the additional information it provided to us, did not consider that the site sought to be included by the submitter fulfilled its criteria for small, site specific additions to future development areas.<sup>2</sup> We were not able to discuss or test the conclusions with the authors of that report. We must take a precautionary approach to that information, but it is relevant information for us to take it into account.

However, we do consider that the conclusion of the reporting officers in this situation is sound. That is, they do not consider that additional land proposed by submitters is preferable to that identified in Our Space or necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch. The land is best considered as part of subsequent RMA planning processes, including changes to the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including spatial planning.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Considers that restricting the supply of new housing sections in Christchurch will push up prices and force people out to the towns, and that the limited demand for intensive developments won't change as fast as anticipated.

#### **Hearing Panel discussion and recommendation:**

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<sup>1</sup> Cashmere Park Trust (#15)

<sup>2</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

We have addressed the matter of supply of greenfield land above, noting that there is significant supply in the Christchurch area. When responding to this submission, officers referred also to Theme 9 of the officers' report regarding provision of social and affordable housing and having a range of housing types. They noted that Section 3.2 of Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded, increasing the need for smaller and multi-unit dwellings over time to complement the existing housing stock dominated by larger standalone houses.

We accept the officers' position on this. Monitoring and ongoing capacity assessments will continue to refine the predicted demand for housing types.

As a result, no changes are recommended as a result of this submission point.

Notes that commercial developments in suburban locations should not be forgotten or disadvantaged by the planning framework.

**Hearing Panel discussion and recommendation:**

Officers referred to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. Officers did consider that better linkages could be made in Our Space as to the policy intent behind Key Activity Centres and the relationship with 10-minute neighbourhoods, and recommended changes to Section 5 of the Strategy. We did not hear from Mr Lewis in relation to this submission point at the hearing.

To that extent, we accept the changes recommended to us by officers, which address some of the submitters concerns, by way of amendment. As a consequence, we accept the submission in part.

Considers that there is insufficient industrial land available as much of the land is owned by a few people who restrict development to maintain higher industrial land prices.

**Hearing Panel discussion and recommendation:**

We did not hear from Mr Lewis in relation to this submission point at the hearing. We are satisfied with officers' response that there is a significant over-supply of industrial land across Christchurch to meet demand over the long term.

No changes are recommended as a result of this submission.

Highlights factors that cause land shortages and development delays, including planning processes, delays from zoning, subdivision approvals and consenting, and limiting infrastructure through a rigid planning approach.

**Hearing Panel discussion and recommendation:**

Mr Lewis did not present to us specifically on this submission point. Officers referred us to comment and recommendation outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure, and integration with development*). They noted that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after adding margins to the projected demand to allow for situations when developments are either delayed or not brought to the market at all. Section 3.2 of Our Space outlines these findings. We accept the officers' response in relation to this matter.

No changes are recommended as a result of this submission point.

Notes that little account has been given to the future with autonomous vehicles and changing work practices.

**Hearing Panel discussion and recommendation:**

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We did not hear from Mr Lewis on this submission point. Officers recommended that regular monitoring of market indicators and trends will inform subsequent capacity assessments, which the NPS-UDC requires to be undertaken every three years. They advised that such assessments will enable councils to respond to any changing travel and workplace behaviours.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Notes that there is reference to Map A in Section 5.7 (p. 31) but that no map is provided.

**Hearing Panel discussion and recommendation:**

Officers have recommended amending Section 5.7 in relation to this submission point, and consequential references are also amended.

We recommended that this submission point is accepted and corrections made.

***Te Waipounamu Community Housing Network (016)***

Supports the commitment to develop a social and affordable housing action plan and considers that the provision of community facilities and infrastructure should also be considered as part of such a plan.

**Hearing Panel discussion and recommendation:**

We heard from Ms Jill Hawkey and Mr Peter Taylor for Te Waipounamu Community Housing Network. They expanded on their submission, providing examples of inclusionary housing in Queenstown, and wanting more definite information around the timing for the social and affordable housing action plan. They described concerns that affordable housing needs to be in reach of public transport, and advocated access to community facilities so that density is provided where there are services.

We sought further information in relation to this from officers in Minute 2. They amended their response and provided greater detail around the timing for the action plan. We accept the officers' recommendation that this information is included in Our Space. It is noted that the action plan is not currently identified in Annual Plans, and so we also recommended that this is considered as an action outside of the Our Space document.

***Steve Holland (017)***

Considers that social housing should be spread across Greater Christchurch and not grouped into any one area.

**Hearing Panel discussion and recommendation:**

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*) in the officers' report.

The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. This action plan is covered in Section 5.1 and Section 6.2 of Our Space (as recommended to be revised above in in the body of our report).

We accept the officers' recommendations and do not recommend any further changes as a result of this submission point, however noting the recommended changes to Section 6.2 to include a timeframe for the Action Plan

Supports the protection of transport corridors, development of more public transport options, such as rail, and promotion of electric transport modes.

**Hearing Panel discussion and recommendation:**

Officers referred us to their comments and recommendation outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*). They said the option of rail

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services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**Suzanne Vallance (018)**

Highlights issues related to poorly managed intensification, including the limited control over how these urban environments develop and the need for more place-making and participatory planning processes.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (*Poor intensification outcomes and preferences to focus intensification in the Central City*) in the officers' report.

They said that Our Space is a high level, strategic document that seeks to ensure there is sufficient land available to meet future housing and business demand across Greater Christchurch. The strategic planning directions set in this document will then be implemented through local planning processes, such as district plan reviews and structure planning, which will provide further opportunities for local consultation and input to place-making discussions.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Notes the need to consider the potential implications of new Government policy on versatile soils and suggests using the Copenhagen model of the 'hand' rather than concentric circles to support an integrated urban form.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendations outlined in Section 4 in relation to Themes 3 (*Protecting productive, agricultural and high quality soils from urban expansion*) and 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*) in the officers report.

They said that the urban form promoted in Our Space is consistent with the existing strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Any broader considerations of Greater Christchurch's urban form would be best considered during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of Our Space in the schedule of future work.

We note that while some areas within Future Development Areas contain versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position on these matters, which includes additional wording in Sections 4 and 5 to highlight the implications of urban growth on sustainability, and to this extent, we accept the submission in part.

Notes that a resilient city has suitable redundancy, diversity, modularity and distribution of commercial activity.

**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Suggests solutions for housing an ageing population, including partitioning and building adaptable homes.

**Hearing Panel discussion and recommendation:**

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Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*). They noted that *Our Space* does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have some planning provisions in this regard and can consider this further through district plan reviews and changes.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Supports the '10-minute neighbourhood' concept and considers that councils should have contingent funding to enable such ideas that surface as part of consultations.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report,. Officers also addressed this further in their Reply Report (question 9) with respect to the 10-minute neighbourhood concept.

Officers recommend amendments to section 5.7 to clarify the policy intent behind key activity centres and the connection with the 10-minute neighbourhood conceptual diagram in Figure 19.

The allocation of funding in councils' Long Term Plans is out of scope for *Our Space*.

We accept the officers' recommendations on this, including the recommended changes to section 5.7. We do not recommend any further changes as a result of this submission point.

***Gillman Wheelans (019)***

Considers that the availability of feasible development land in Christchurch is becoming constrained and that the expansion of such towns as West Melton, Prebbleton and Woodend could support capacity shortfalls.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. Section 3.2 of *Our Space* outlines the findings on the sufficiency of housing development capacity.

We were told that *Our Space* proposes future development areas in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls in Selwyn and Waimakariri. These future development areas align with the strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of *Our Space* in the schedule of future work.

We heard from Mr Hamish Wheelans in relation to his submission, who provided us with an overview of some of the costs and constraints in relation to dealing with TC3 land.

He noted the housing booms, when markets were strong, there was a greater desire for larger sections, whereas when the market was weaker, higher density development prevailed. He described the Delamane development at Yaldhurst which was developed at around 13.4 households per hectare. When the global financial crisis hit in 2006, that higher density development stopped as builders were not able to get finance. This was an example of how the development market changes. The increase in density requires more roading, and that change gets exponentially harder. In addition, costs are involved with remediation of TC3

land, either through the land itself or through foundation design. He did not agree that an urban limit is appropriate, in particular at West Melton.

In response to questions from the Panel, Mr Wheelans said that he acknowledged that higher density living was growing, but that did not cater for everyone. He considered that that type of living was location based, and appropriate in the inner city, but not in the outlying suburbs. In terms of land cost, the difference between a unit in a greenfield site and a house on a single lot was not that great, and so the demand is much higher for those standalone houses. This compares to the city where the land is much more expensive, which creates a greater gap between standalone houses and apartments. He highlighted that land that was constrained by TC3 rated land would struggle to develop to an appropriate cost. He indicated that approximate costs for development of TC3 land could be between \$50-60,000, which would make it uneconomic to develop. He had not seen any examples of cheap foundations for TC3 land.

We agree with the position put forward by the officers. Updated capacity assessments will continually inform areas for development. This will lead to future planning and identification of land as part of future changes. The appropriate time to consider those additional areas is as part of the full review of the Canterbury Regional Policy Statement in 2022, noting although *Our Space* does not discount the possibility that other land may be appropriate for future housing and business uses, it is important that any land identified for urban development is consistent with the strategic directions from the Urban Development Strategy and Canterbury Regional Policy Statement that seek to promote a consolidated urban form in Greater Christchurch, and that it aligns with the infrastructure servicing arrangements outlined in Long Term Plans and infrastructure strategies.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Considers that the demand for multi-unit developments is overstated and that constraining land supply for greenfield subdivisions in Christchurch will increase costs and prices for housing.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 4 (*Need for further greenfield areas, including specific sites proposed in each district*) and 9 (*Provision of social and affordable housing, and a range of housing types*). They said that the primary purpose of *Our Space* is to demonstrate there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is provided in a way that aligns with the strategic directions of the Urban Development Strategy. This is achieved by assessing the development capacity of currently zoned areas and identifying new future development areas where there are projected capacity shortfalls, as is the case for Selwyn and Waimakariri, that are consistent with the Urban Development Strategy, district development strategies (*Selwyn 2031* and *Our District, Our Future* for Waimakariri) and Long Term Plans.

We do not consider that demand for multi-unit development is overstated. Planned development will provide for a range of housing typologies, and demand changes over time.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Notes that private developers are unlikely to consider affordable housing without Government subsidisation.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in *Our Space*.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Considers that requiring commercial activity to locate in existing centres contradicts having shops and services that are accessible without the use of transport modes, and that there should be allowances for new centres.

**Hearing Panel discussion and recommendation:**

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report. Reporting officers also addressed this in their reply report in response to Question 9. They said that *Our Space* reflects the current Canterbury Regional Policy Statement policy direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.

Officers recommend amendments to section 5.7 to clarify the policy intent behind key activity centres and the connection with the 10-minute neighbourhood conceptual diagram in Figure 19.

We further note provision for neighbourhood centres in the district plans, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10-minute neighbourhoods.

We accept the officers' recommendations, and do not recommend any further changes as a result of this submission point.

Considers that the projected growth for Selwyn is understated, and that growth is dynamic so ring-fencing the growth of towns based on currently known factors will result in inflexibilities.

**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) in the officers' report. They noted that in July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in *Our Space* reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. The approach to territorial authority housing targets in *Our Space* allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term, it is in the apportionment by territorial authority that *Our Space* differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazards which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Questions whether privately supplied infrastructure to encourage growth would be appropriate if it meant the population could have greater say in where and what form of housing they chose to reside.

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**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendation outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure, and integration with development*). They also noted that the evidence base associated with Our Space demonstrates there is sufficient capacity planned for other infrastructure to support the projected growth in Greater Christchurch. Our Space will need to monitor and review the effect of future growth on this infrastructure provision as part of subsequent capacity assessments, which includes engaging closely with infrastructure providers and operators.

We note that the request by the submitter is inconsistent with the Urban Development Strategy. We also note that it is the Council is usually vested with infrastructure and becomes responsible for that infrastructure. We are satisfied that the current approach to infrastructure, including the planning for it, is appropriately provided for in LGA infrastructure plans.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

***Dalkeith Holdings Limited (020)***

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston in relation to the Dalkeith submission. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rangiora and has just 3 landowners. The site is within the projected infrastructure boundary (identified as the 'urban limit') in the first version of Proposed Change 1 (PC1) to the CRPS, which indicated the possibility of development from 2028 to 2041.

She considered that the Dalkeith land should be identified for development before any other land outside of the projected infrastructure boundary. She sought that if sequencing were to take place, provision should be made to develop this land.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

We are satisfied that the proposed Change to Chapter 6 of the CRPS to enable the development of future development areas, the subsequent district plan and review of the Canterbury Regional Policy Statement in 2022 provide adequate timing for development.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Queries why the future development areas have not been identified as Greenfield Priority Areas and considers that deferring decisions on when these areas are developed until the District Plan Review stage could risk adding delays and uncertainties.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

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Considers that a high growth projection scenario could be more appropriate for Waimakariri given recent trends.

**Hearing Panel discussion and recommendation:**

Officers referred to their recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). In summary, they said that there are uncertainties in determining future demand. This is reflected in the NPS-UDC requirements for ongoing monitoring and review of projections and targets as part of periodic capacity assessments. Officers said that subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ in 2020.

We accept the officers' position on this and no changes are recommended as a result of this submission point.

**Lionel Green (021)**

Landowner seeks the inclusion of land (outside the PIB) on Marshlands Rd, Christchurch for development through changes to the CRPS that provide flexibility to respond to minor zoning anomalies or development proposals.

**Hearing Panel discussion and recommendation:**

Mr Green seeks to subdivide his land into two approximately two hectare lots. We heard from Ms Aston in relation to the request for flexibility around the urban edge. Ms Aston considered that development under 4 hectares could be considered on the 'urban continuum', and should be provided for in Our Space. Ms Aston referred us to the definition of urban environment in the NPS UDC:

Ms Aston could only provide anecdotal evidence that there is a lack of supply of rural residential land. Officers provided a further explanation in relation to rural residential and large lot development in their reply.

We are satisfied with and accept the officers' recommendation that in terms of changes to existing policy, that this is properly left for the full review of the Canterbury Regional Policy Statement in 2022

No changes are recommended as a result of this submission.

**Sharon Jones (022)**

Landowner seeks the inclusion of land (outside the PIB) in Rolleston for future development, noting the imminent changes to the airport noise contours, and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston and Mr Phillip Kennard in relation to the submission of Ms Sharon Jones.

The combined area subject to the submission is just under 42 hectares adjoining existing Greenfield Priority Areas, and is located under the noise contours for Christchurch Airport. Ms Aston noted that Mr Bonis said that it was likely that the noise contours would be reduced at Rolleston and Kaiapoi. As such, they would like to identify that land in advance as Greenfield Priority Area. She noted that the Future Development Area at Kaiapoi includes land that is located within the contour at Kaiapoi. In terms of the suitability of the land, it was defensible and created a consolidated urban form. She said it was close to the town centre, and could be serviced, even it wasn't in the Projected Infrastructure Boundary.

Mr Kennard said that the land met all of the criteria under the NPS-UDC for zoning urban land except for the airport noise contour. In response to questions from the Panel, Mr Kennard said that he saw that it would lend itself well to medium to high density development, as well as rest home type activities.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*), and reporting officers' reply report (question 13) regarding further investigation ahead of the review of the Canterbury Regional Policy Statement in 2022. They acknowledged the work being undertaken by Christchurch International Airport to trial alternative flight paths. The most appropriate process to consider the impacts on zoning from any changes to the airport noise contour is during the review of the Canterbury Regional Policy Statement scheduled for 2022. They noted the review is identified in Section 6.2 of Our Space in the schedule of future work.

We accept the officers' position and no changes are recommended as a result of this submission point.

Requests that the status of future development areas, as amended to include the submitter's land, are changed to Greenfield Priority Areas to enable zoning and development to proceed.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

**Hearing Panel discussion and recommendation:**

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response in greater detail.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

***Ivan Robertson, Lindsay and Judith Blackmore, and Malcolm Main (023)***

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston in relation to the Robertson, Blackmore and Main submission. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

In relation to higher densities sought by CCC, she noted that Rolleston had been very successful without that requirement, and that it operated a high frequency bus service.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

We are satisfied that the district plans and review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019 ). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

**Hearing Panel discussion and recommendation:**

We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

**Hearing Panel discussion and recommendation:**

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 (of Our Space outlines the proposed planning response.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**CJFA Holdings Ltd - South Rolleston (024)**

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston and Mr Bob Patton in relation to the CJFA Holdings Limited Land, a 16 ha block adjoining Farringdon. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

Mr Patton said it was important to get affordable housing with a variety of house sizes noting that terrace housing was a potentially good outcome. Mr Patton said his client has happy to develop up to 15 households per hectare.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

We are satisfied that the district plans and review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that no further capacity is provided in Selwyn for the medium term and only in Rolleston for the long term.

**Hearing Panel discussion and recommendation:**

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

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### **Barry Gallagher and David Tipple (025)**

Landowner seeks the inclusion of land (outside the PIB) in north-east Christchurch for future development as a Greenfield Priority Area that provides for large lot residential subdivision, and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from both Ms Aston and Mr David Tipple in relation to the submission from Barry Gallagher and David Tipple. We note that the net density for development under the Canterbury Regional Policy Statement excludes areas that are subject to geotechnical constraints, which can give rise to larger lot sizes. In addition to this, no information was provided in relation to quantification of, or supply or demand for, larger lots, or the impact of this on the efficient use of the land resource. Mr Tipple provided us with a clear view his opinions of the need to provide larger lots for development. We do not consider that the densities recommended by us preclude provision for social development of children for the types of activities indicated by Mr Tipple. No information was provided to us that provision of further greenfield land was required due to a shortfall in capability to provide for housing in the Christchurch area. We note the significant supply in the short term that is provided for in Table 3 of Our Space.

We accept the officers' recommendations that consideration of large lot or rural residential development outside of the urban area can be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended as a result of this submission.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

**Hearing Panel discussion and recommendation:**

We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

No changes are recommended as a result of this submission.

### **Ellis Darussette Ltd (026)**

Landowner supports the inclusion of land (within the PIB) in Rolleston for future development and seeks expedited plan changes to enable timely development.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston and Ms Jeanette Ellis in support of the submission for Ellis Darussette. Ms Aston described how Ellis Darussette land was excluded from the Housing Accord Special Housing Area from the neighbouring land. There is subdivision being undertaken on that land. No opportunity was given to join the SHA. The owners have been advised that because the land is not included in Map A of the CRPS, they are unlikely to get consent. She sought that the land be identified as a Greenfield Priority Area. It is currently located within the projected infrastructure boundary at Rolleston. She sought that if sequencing were to take place, provision should be made to develop this land.

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

We are satisfied that the district plans and review of the Canterbury Regional Policy Statement provides adequate timing for development.

We accept in part the submitters request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the

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review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.  
compromise the overall aims for urban consolidation through cumulative impacts of multiple rezonings.

Requests that the status of future development areas are amended to Greenfield Priority Areas to enable zoning and development to proceed.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the CRPS Map A proposed in Our Space for 2019 ). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks changes to the CRPS that provide flexibility to accommodate meritorious proposals for urban development and zoning, and facilitate a more responsive planning approach to urban growth management.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop, and increases the likelihood of fragmentation of that land, potentially resulting in less ability to properly structure plan and develop that land for urban activities at a later date.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Considers that it is appropriate to provide additional Greenfield Priority Areas in both Selwyn and Waimakariri to provide for demand over the medium term given the uncertainties associated with the assessments.

**Hearing Panel discussion and recommendation:**

Officers said that the proposed change to the Canterbury Regional Policy Statement to identify future development areas in Rolleston, Rangiora and Kaiapoi that are within the Projected Infrastructure Boundary will seek to ensure there is sufficient capacity to meet the demands for housing in Selwyn and Waimakariri over the medium and long term. Section 5.3 of Our Space outlines the proposed planning response.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Requests that Figure 16 (p. 25) is amended to identify the submitter's land as a Greenfield Priority Area and show that it is not located within the Special Housing Area.

**Hearing Panel discussion and recommendation:**

We agree with the officers, that the submitter's land should be identified . We accept the submission point and recommend amending Figures 15 and 16 accordingly.

**Hearing Panel's recommendation:**

Amend Figures 15 and 16 to include the submitter's land as Greenfield Priority Area.

**Victoria Foxton (027)**

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Landowner seeks the inclusion of land (outside the PIB) on Port Hills Rd/Scruttons Rd, Christchurch for future development.

**Hearing Panel discussion and recommendation:**

We accept the assessment in the officers' report which is set out in Section 4 Theme 4. Demand can be met for future housing needs through appropriate densities both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept in part the submitter's request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Considers that there are plenty of potential greenfield areas available in and around Christchurch for development, and that areas being encouraged for redevelopment and higher densities have had negative outcomes.

**Hearing Panel discussion and recommendation:**

Officers referred to their recommendation outlined in Section 4 in relation to Theme 7 (*Poor intensification outcomes and preferences to focus intensification in the Central City*) in the officers' report. This notes that Christchurch has many examples of high quality residential intensification, and that these matters are best dealt with at a territorial authority level. We accept this and further note that Christchurch has recently been through a district plan review which addresses design matters comprehensively, and that Selwyn and Waimakariri District Councils are about to embark on their reviews.

We accept the officers' position and no changes are recommended as a result of this submission point.

Questions the role of Christchurch City Council in providing and funding social and affordable housing.

**Hearing Panel discussion and recommendation:**

We refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*).

The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. However, specific details of such an action plan have yet to be determined. The action plan is discussed in Section 5.1 and Section 6.2 of Our Space.

We additionally note that submissions on matters such as provision and funding of social and affordable housing is also a matter for annual plan and long term planning processes.

We accept the officers' position that no changes are necessary, and as a result, no changes are recommended as a result of this submission point.

Considers that commercial developments in suburban areas should not be disregarded as not all people want to shop in a mall or the Central City, and it is important that suburban communities are allowed to grow.

**Hearing Panel discussion and recommendation:**

Officers referred to Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) of the officers' report. This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation and accept the submission point in part.

Questions why more industrial land shouldn't be made available instead of having enough to just meet demand.

**Hearing Panel discussion and recommendation:**

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Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (*Transport needs and implications, including for public and active transport*) and 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) of the officers' report. They noted the Capacity Assessment identified a significant over-supply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 of Our Space outlines these findings.

No changes are recommended as a result of this submission point.

Supports the proposals for rapid transport corridors.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*) in the officers' report.

We note support for rapid transport corridors.

No changes are recommended as a result of this submission point.

**M. Springer (028)**

Landowner seeks the inclusion of land (outside the PIB) in Prebbleton for future development.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendation in the officers' report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of areas outside the Projected Infrastructure Boundary should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept in part the submitters request, to the extent that we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

**Inovo Projects (029)**

Considers that additional greenfield land may be necessary in Christchurch as some identified greenfield areas will be unsuitable for development from a geotechnical perspective.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report.

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. The feasibility test considered geotechnical conditions. Section 3.2 of Our Space outlines the findings on the sufficiency of housing development capacity.

No changes are recommended as a result of this submission point.

Notes that additional greenfield land may be required to meet demand in other towns, such as West Melton.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*), and reporting officers' reply report (question 13) regarding further investigation ahead of the review of the Canterbury Regional Policy Statement in 2022.

They said that the Capacity Assessment identified sufficient development capacity in Christchurch City to meet long term housing demand, even after discounting areas that were assessed to be commercially unfeasible to develop. Section 3.2 of Our Space outlines the findings on the sufficiency of housing development capacity.

We were told that Our Space proposes future development areas in Rolleston, Rangiora and Kaiapoi to help address projected housing capacity shortfalls in Selwyn and Waimakariri. These future development areas align with the strategic directions of the Urban Development Strategy and Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the potential growth of other towns in Greater Christchurch is during the full review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 of Our Space in the schedule of future work.

We agree with the position put forward by officers. Uptake and capacity assessments will continually inform constraints on existing areas identified for development. This will lead to future planning and identification of land as part of future changes. The appropriate time to consider those additional areas is as part of the full review of the Canterbury Regional Policy Statement in 2022, noting although Our Space does not discount the possibility that other land may be appropriate for future housing and business uses, it is important that any land identified for urban development is consistent with the strategic directions from the Urban Development Strategy and Canterbury Regional Policy Statement which seek to promote a consolidated urban form in Greater Christchurch, and that it aligns with the infrastructure servicing arrangements outlined in relevant Long Term Plans and infrastructure strategies.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Supports the approach of requiring a diverse range of housing but considers that the 15 households per hectare requirement for greenfield areas in Christchurch inhibits the delivery of housing diversity.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) and 9 (*Provision of social and affordable housing, and a range of housing types*) in the hearing reports. They considered the evidence base associated with Our Space demonstrates the need to enable a range of housing types and identifies the matters that are likely to impact demand for different housing types over time. Our Space will need to monitor and review the anticipated scale and pace of changes to housing demand as part of subsequent capacity assessments.

We consider that in Christchurch city, provision for higher densities is required to avoid sprawl, as well as create a good environment that supports public transport patronage.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Supports commercial activities in the main town centres but considers that some activities may be better located outside these areas.

**Hearing Panel discussion and recommendation:**

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report. They said that Our Space reflects the current Canterbury Regional Policy Statement direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.

We further note provision for neighbourhood centres in the district plans, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10 minute neighbourhoods.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

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Highlights the uncertainties with the projected demands and the impacts of uncontrollable events.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) in the officers report. They noted that In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term, it is in the apportionment by territorial authority that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**Oderings Nurseries Limited (030)**

Landowner seeks the inclusion of land (outside the PIB) on Cashmere Rd, Christchurch for future development.

**Hearing Panel discussion and recommendation:**

We heard from Mr Julian Odering and Mr Lewis in relation to the submission of Oderings Nurseries Limited. Mr Ordering confirmed that he wanted the Panel to enable him to develop his land through rezoning of both their Cashmere Road and Philpotts Road properties. **[Is this addressed?]**

Officers do not support the inclusion of additional development in the Hendersons Basin/Cashmere flood plain area, on the basis that there is sufficient land available within the existing Christchurch area to cater for greenfield growth. We have considered the submitters request, and note that in relation to the land, we have not received expert evidence on the matter of flooding and flood heights, either from the submitter, or the Christchurch City Council. We do note that the Christchurch City Council, in the additional information it provided to us, did not consider that the site sought to be included by the submitter fulfilled its criteria for small, site specific additions to future development areas.<sup>3</sup> We were not able to discuss or test the conclusions with the authors of that report. We must take a precautionary approach to that information, but it is relevant information for us to take it into account.

We agree with the officers, who do not consider that the additional land proposed by the submitter is preferable to the land identified in Our Space, or is necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch. The inclusion of additional land is best considered as part of subsequent RMA planning processes, including changes to the Canterbury Regional Policy Statement and district plans, and relevant LGA process, including spatial planning.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy

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<sup>3</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

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Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended as a result of this submission point.

Identifies RMA processes, council charges and health and safety requisites as barriers to affordable housing.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in Our Space. As such, we consider that there are pathways to enabling affordable housing.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Considers that public transport and cycling are unattractive modes of transport, and supports commercial developments in the suburbs and towns as they are more accessible by car than the Central City.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 6 (*Transport needs and implications, including for public and active transport*) and 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept.

Higher densities provide for modal choice, and if more people cycle or use public transport, this will reduce congestion.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Notes that greenfield developments located near existing infrastructure is advantageous for councils and residents.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure, and integration with development*).

The submission point is noted.

No changes are recommended as a result of this submission point.

***Car Distribution Group Limited (031)***

Landowner supports the identification of land (within the PIB) on Johns Rd, Christchurch as a Greenfield Priority Area for business.

**Hearing Panel discussion and recommendation:**

Officers noted that this land is identified as a Greenfield Priority Area for business on Map A of the Canterbury Regional Policy Statement. However, the recent Christchurch District Plan Review concluded that this land could not be rezoned at that time. We are advised that further consideration of this matter is proceeding between the landowner and Christchurch City Council.

No changes are recommended as a result of this submission point.

***Infinity Investment Group Holdings Limited (032)***

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Developer with mixed-use developments (within the PIB) at Yaldhurst Park, Christchurch and Ravenswood, Woodend requests a projections-led approach to targets to ensure housing is not under-supplied in Waimakariri.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) and theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report.

They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the review of the Canterbury Regional Policy Statement in 2022 is the appropriate time to consider identification of further areas.

We accept officers' position. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

**Majority Beneficiaries of the Bellgrove Family Trust; Gary Inch, Devin Inch, Sharlene Inch and Courtney Inch (033)**

Landowner supports the inclusion of land (within the PIB) in Rangiora for future development.

**Hearing Panel discussion and recommendation:**

We heard from Mr Courtney Inch on behalf of the Beneficiaries of the Bellgrove Family Trust, which supported the identification of its land for future development. Officers continue to support the current identification of the site.

No changes are recommended as a result of this submission point.

**Geoff Marks (034)**

Notes the need to consider the development of tiny house communities as a new form of affordable housing.

**Hearing Panel discussion and recommendation:**

Officers refer us to comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*) in the officers' report. They said that Our Space does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have planning provisions in this regard, and further consideration may be appropriate through district plan reviews.

We understand from officers that Christchurch City Council is currently working with the Canterbury Tiny House Society on its proposal for a temporary land use in the Ōtākaro Avon River Corridor Regeneration Area.

No changes are recommended as a result of this submission point.

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### ***RJ Civil Construction (035)***

Landowner seeks the inclusion of land (outside the PIB) on Sawyers Arm Rd, Christchurch for future development as a Greenfield Priority Area for business, thereby reflecting the current use of the site as a contractor's yard.

#### **Hearing Panel discussion and recommendation:**

We heard from Mr Fitzgerald in relation to the submission from R J Civil Construction. The site at 510 Sawyers Arms Road is currently operating as a contractors yard, operating under a temporary resource consent for business activities following the earthquakes. Mr Fitzgerald told us that the site has significant access advantages to arterial roads, which suited the civil engineering contracting business operating on the site. Including the site as a Future Development Area would reflect the existing use on the site for vehicle storage. Officers referred to their general assessment regarding the need for further greenfield areas in Christchurch City.

We are cognisant of the role that the identified greenfield priority areas and future development area land has in providing a reasonable amount of certainty for rural amenity, particularly given that the projected supply of land for industrial and commercial purposes is considered to be sufficient for the next 30 years. We also note the temporary nature of the activity which is directly related to the earthquakes.

Given the above, we do not consider that expansion of the future development area for business land to incorporate the submitter's land to be appropriate. In this respect, we accept the recommendations as set out in Section 4 Theme 4 of the officers' report.

We accept the officers' position in relation to this submission and have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Concerned that Figure 16 (p. 25) does not reflect recent developments and existing land use activities.

#### **Hearing Panel discussion and recommendation:**

We accept the officers' position that the Map at Figure 16 is not developed at that scale and it is not appropriate to identify such detail. In addition, we note that there are various business type activities through the rural area that operate by way of consent, such as that at the submitter's location.

No changes are recommended as a result of this submission.

### ***Lawrence and Cherry McCallum (036)***

Considers that recent growth has represented controlled urban sprawl, which is a distortion of the UDS strategic direction and at the expense of providing well-designed medium density living in the central core.

#### **Hearing Panel discussion and recommendation:**

We heard from Mrs Cherry and Mr Lawrie McCallum in relation to their submission.

Mr McCallum said that a disproportionate amount of growth has gone to Selwyn and Waimakariri, when it should have gone to the key activity and central cities and intensification. He hoped that the Partnership was a true Partnership, and that perhaps this was reflected in the different reports and submissions from Christchurch City Council.

Mr McCallum considered that more development should be going to the city, rather than to Waimakariri and Selwyn. More medium density was required in the central city for aging people that can walk to cafes, and that there needed a reboot of the public transport system. He did not consider buses would do it on their own, and there is a need to move to light rail. There is a need to integrate exercise to address the obesity epidemic, and climate change needs to be addressed. He said this all points towards more medium density in the central city and better public transport. He said that we need to live in a climate friendly way. Mrs McCallum agreed and that investment in light rail needed to be made now, including separation between scooters, bikes and pedestrians.

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In response to questions from the Panel, Mr McCallum did not want more effort put into getting people between Rolleston and Rangiora and the City, but did want to see more effort put into getting people from within Christchurch moving around, particular from the eastern Christchurch into the city. He said that aggregation of land would lead to better design.

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) and 7 (*Poor intensification outcomes and preferences to focus intensification in the Central City*). Officers noted that Our Space seeks to ensure there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is met in a way that aligns with the strategic directions from the Urban Development Strategy. With this in mind, over 80% of the development capacity identified in Our Space is already zoned in district plans, either in existing urban area zonings that enable redevelopment at higher densities (45%) or in undeveloped greenfield areas (36%).

We accept the officers' position that no changes are recommended in response to this submission point.

Supports providing a range of new housing types and developing a social and affordable housing action plan.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*) of the officers' report.

They did not recommend additional changes in the officers' report, but as part of their reply, they included a timeframe for the development of the action plan. The matters addressed above will explore a number of different options in terms of providing for social and affordable housing.

We accept the officers' position noting the recommendation to include a timeframe for the development of the action plan. No further changes are recommended in response to this submission point.

Seeks more urgent provision for high frequency public transport and active transport modes.

**Hearing Panel discussion and recommendation:**

Officers referred us to their comments and recommendation outlined in Section 4 in relation to theme 6 (*Transport needs and implications, including for public and active transport*). They said the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Promotes putting power and telephone lines underground to improve the amenity of existing residential areas.

**Hearing Panel discussion and recommendation:**

Officers noted this. The said that this matter is more appropriately addressed through more detailed planning and development processes at a local authority level.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Seeks the retention of noise sensitive development policies surrounding the airport, protection of the unconfined aquifer from quarrying and development, and no development in floodplains and coastal hazard zones.

**Hearing Panel discussion and recommendation:**

Officers noted this. No changes are proposed to the matters set out in the submission point.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

***Sustainable Ōtautahi Christchurch (037)***

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Considers that planning for future growth needs must be firmly redirected towards the 'big picture' issues, such as zero carbon aspirations, with the risks of continuing along a path of market-led growth likely to become very clear within a generation.

**Hearing Panel discussion and recommendation:**

We heard from Mr John Peet for Sustainable Ōtautahi Christchurch. He said that changes from raw economic growth to wellbeing over the last few years had changed. He said that world-wide, there is a gathering storm of high level risks, which are outlined in the submission, including climate change, sea level rise, and depletion of high quality resources. The assumptions behind the study assume a linear environment, rather than one that will radically change. This requires an overarching risk-based philosophy to be adopted for the strategy. He argued that it needs to be flexible, adaptable and evolutionary approach that is solutions-based, and it was his opinion that the strategy would not deliver this, even though it is looking 30 years into the future.

Officers referred to the comment and recommendation outlined in Section 4 in relation to theme 11 (*Addressing climate change, and achieving sustainability and zero carbon goals*).

They said that Our Space seeks to balance the projected future demands of housing and business markets with the urban form that will best enable sustainable growth. This is reflected in the approach to setting housing targets, as outlined in Section 3.2, which is projections-led over the medium term and principles-based over the long term. They said that the proposed development of a social and affordable housing action plan also responds to the need for intervention. This action plan is covered in Section 5.1 and Section 6.2.

. We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

To that extent, the submission is accepted in part, to better recognise those matters as set out above.

Notes that the consultation processes currently followed by government are seldom put forward in a way that encourages response for meaningful input from third sector organisations.

**Hearing Panel discussion and recommendation:**

Officers consider that the role of Third Sector Organisations as collaborative partners could be referred to more explicitly in Our Space. They recommend adding a reference to third sector organisations in the second para of section 6.3 beginning "Although the implementation...".

We accept officers position on this and recommend that it is amended accordingly.

***Cathedral City Development Ltd (038)***

Landowner seeks inclusion of additional land (outside the PIB) on Port Hills land, Christchurch.

**Hearing Panel discussion and recommendation:**

We heard from Ms Aston and Mr Fox regarding the submission from Cathedral City Development Limited in relation to its land on Harry Ell Drive in Cashmere. It was submitted that large lot residential would be the most efficient use of the land which is served by public transport and provided for walking linkages. It was considered that the addition of 10 lots is very minor in the scale of the capacity figures in Our Space and it would be better to provide for development now, rather than waiting for it. Apart from anecdotal evidence, no information or analysis was provided to us on the market for large lot development land. We note that large lot development can be achieved anywhere throughout the city by way of amalgamation and/or purchase of adjacent titles at market rates.

We accept the officers' comments and recommendations outlined in Section 4 in relation to theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*). This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

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No changes are recommended as a result of this submission.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

**Hearing Panel discussion and recommendation:**

No recommendations were made by the submitter as to how this should be addressed in the housing capacity methodology. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>4</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended as a result of this submission.

Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.

**Hearing Panel discussion and recommendation:**

We acknowledge that there may be examples where some hill development will not necessarily be feasible to develop to its full potential, however we accept the officers' position that capacity for both Christchurch and over the Greater Christchurch area is catered for in the medium term, and that those estimates build in an additional capacity margin to address this situation.

No changes are recommended as a result of this submission.

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

**Hearing Panel discussion and recommendation:**

We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.

No changes are recommended as a result of this submission.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.

No changes are recommended as a result of this submission.

***Christchurch International Airport Limited (039)***

Advises that noise contours are currently being re-modelled with revised contours available in early 2019.

**Hearing Panel discussion and recommendation:**

We heard from Ms Appleyard, Mr Rhys Boswell, Mr Greg Akehurst, Mr Anthony Penny and Mr Matthew Bonis in relation to the submission and evidence presented on behalf of Christchurch International Airport Limited (CIAL). They described how the revised noise contours would be approximately 6 months away. Indications at present were that they would not be extended into areas of future development identified in Our Space.

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<sup>4</sup> Page 8 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure and integration with development*). They noted the comment from CIAL and said that this matter can be addressed as part of subsequent RMA processes, including the review of the Canterbury Regional Policy Statement.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Considers airport should be recognised as a Key Employment, Commercial and Transport Node and assists in providing for medium to long term commercial needs.

**Hearing Panel discussion and recommendation:**

CIAL seeks that the Projected Infrastructure Boundary is expanded, to identify a Future Development Area which will provide access (adjacent to the runway) to CIAL for logistics and freight in the next 10-30 years. Not providing for this use will lead to lower GDP contribution from Christchurch if the activities such as courier and manufacturing industries (which is then transported by air) cannot locate there, and business will be lost to other cities. CIAL considers that it is important not to preclude the ability of surplus land to become general industrial into the future.

Mr Boswell provided examples of activities that required easy access to runways. He described how land north of Memorial Avenue is not well set up and is spatially constrained, and how CIAL has tried to separate heavy vehicle movements from passenger movements. This has means that rental vehicle activities are focussed in the north, with freight in the south at Dakota Park.

Mr Penny Mr Penney presented to us on traffic matters. He noted that extensions to Dakota Park are feasible from a traffic perspective, including links to bypass Hornby via Pound Road. Identifying Memorial Road as a potential rapid transit route, or at least a key bus route would help with assisting for upgrades, including provisions for cyclists and road widening.

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 7 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood*) in the officers' report.

Officers do not consider it appropriate to promote the airport as a location for a broad range of commercial uses; the primary objective of the Airport Zone is the efficient use and development of the land, infrastructure and operational facilities of the airport. Such use and development must also be undertaken in a way that is consistent with the overall urban form of Christchurch City, including the centres based commercial strategy. Commercial and industrial zones provide for this wider range of employment sectors. While officers agree that the airport provides significant employment, it is not considered necessary or appropriate to introduce a specific new designation.

We accept the officers reasoning regarding this. In addition, we note that the airport already has special consideration and a framework around its operation as significant infrastructure. That term properly describes its function.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Suggests some airport land would be appropriate to meet identified shortfall of commercial land in the NW of Christchurch.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas (including specific sites proposed in each district)*) in the officers' report.

They said that the Business Capacity Assessment identifies a localised shortfall of commercial land in the northern quadrant of Christchurch City, and this (10ha) shortfall is not forecast to occur until near the end of the long-term planning horizon (i.e. 2044). Provision of capacity to meet longer term needs by expanding the urban boundary or otherwise enabling greater commercial floorspace at the airport is not supported by officers at this time because:

- there is sufficient inner city industrial land available to transition to commercial use to meet longer term needs
- future monitoring will identify the extent of any shortfalls

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- there are other methods available to meet more localised demands in the northern quadrant without needing to expand the urban boundary. These will be explored as part of subsequent capacity assessments and district plan reviews.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks extension of the airport designation towards Ryans Road to accommodate air freight related distribution and warehouse activities.

**Hearing Panel discussion and recommendation:**

Officers noted that Our Space identifies a significant oversupply of industrial land across Greater Christchurch. If the submitter considers additional land is needed for designated purposes the appropriate process is for the requiring authority to pursue an alteration to the existing designation either through a new Notice of Requirement or an alteration to the existing designation as provided for under Part 8 of the RMA. That designation can be considered on its merits and if appropriate inserted into the relevant district plan.

Officers also addressed the evidence of Mr Akehurst in their reply. They noted that the evidence provided by CIAL suggests there will be a long term shortfall of industrial land within the Special Purpose (Airport) Zone (SPAZ) appropriate for logistics, distribution and freight activities that rely on proximity to the airport. The evidence of Mr Akehurst states there is currently approximately 120ha of vacant land immediately surrounding the airport. More detailed analysis of demand, take-up, related locational preferences and reported capacity constraints was not provided. Nevertheless, CIAL has sought additional land be identified for industrial purposes by Our Space outside the current SPAZ adjacent to the SPAZ and Ryans Road.

Officers noted that in recent years some airport land has been used for non-airport industrial uses, albeit permitted within the zone rules, such as commercial activities and development for trade-based activities (i.e. Bunnings). They said that while this may be considered necessary and appropriate to ensure the airport has a reliable revenue stream and runs as a profitable business, it reduces the capacity for industrial use on existing SPAZ land. Officers do not support any changes to Our Space.

We accept the officers' recommendations in this regard, and do not recommend any changes as a result of this submission point.

Seeks identification of an Airport to Central City Rapid Transit Route

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*). They noted that the Future Public Transport Business Case has identified the North and South-West Corridors as future rapid transit routes as they have future demand projections over the next 30 years that could support investment in rapid transit. They also have potential for land use growth. Demand and potential for growth on the Airport to Central City corridor is much lower. It is identified as a core high frequency bus route. Our Space (Section 5.2) does however identify that over time other corridors such as to the airport, to Linwood and Cashmere could be considered for rapid transit to stimulate redevelopment.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Seeks identification of SH1 (Johns Road/Russley Road) as a strategic freight route and acknowledgement of the need for significant upgrades along that route, in particular the grade separation at Sawyers Arms Road.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*) in the officers' report.

They said that the strategic freight routes were not identified in Our Space, as they are identified in other documents (such as the Christchurch Transport Strategic Plan). Instead SH1 (Johns Road/Russley Road) is identified as a State Highway on Figure 18.

Officers noted that the NZTA has completed a Programme Business Case which outlines future upgrades of Russley Road; e.g. the upgrade of Sawyers Arms intersection, and reshape of Harewood intersection. It

would not be appropriate to include the level of detail sought by the submitter, in terms of the specifics of upgrades to roads or intersections, in Our Space.

In their reply, officers recommended:

- Amended wording for Section 5.6, paragraph 7 to make it clear that Our Space recognises that other processes are underway that will address specific transport-related matters, such as potential impacts arising from anticipated future growth in Greater Christchurch.
- Amended wording for Section 5.6, paragraph 9 that acknowledges the need to protect strategic infrastructure and networks in Greater Christchurch.
- Amending Figure 18 to better identify strategic infrastructure and networks in Greater Christchurch.

As a result, we accept the submission in part to the extent that changes to those sections are made.

Flood hazard map should show full extent associated with a breakout of the Waimakariri River.

**Hearing Panel discussion and recommendation:**

Officers said that the level of hazard to the Christchurch urban area and to the airport from a breakout from the Waimakariri River has been reduced to insignificant because of the construction of the secondary stopbank. However, they said that within the secondary stopbank floodplain there are high hazard flooding areas which could be shown on the map, to be consistent with this notation for the rest of the City.

As a result, we accept the submission and amend Figure 10 to depict the full extent of high hazard flooding areas.

Bird strike should be an identified hazard.

**Hearing Panel discussion and recommendation:**

Officers noted that bird strike hazard can be managed by appropriate location and design of some land uses and is not an absolute constraint to development. Officers consider that district plans are the appropriate planning document for managing bird strike hazard; and that an appropriate set of rules is included in the Christchurch District Plan.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**Ben and Sally Tohill (040)**

Landowner seeks inclusion of additional land (outside the PIB) on Marshs/Shands Road by CSM2 in Selwyn.

**Hearing Panel discussion and recommendation:**

We heard from Ms Rykers and Mr Tohill in relation to this submission. The site is crossed by two arms of the CSM2 motorway leaving three distinct land areas that are contained on the same title. Parts of the site are now effectively landlocked, including by the motorway and other industrial land, and it is not economic to use. The Panel sought clarification as to any previous business activities on the site. Mr Tohill described the land, operated by PGG Wrightson, contained buildings with quite a strong industrial form. As a consequence of the zoning rules, the Tohills are not able to subdivide the land, which is separated by the motorway.

Officers' position is that the best time for consideration of what the future use of the land will be is as part of the full review of the Canterbury Regional Policy Statement in 2022. Generally, officers consider that given the over-supply of industrial land that provision of further industrial land as part of a future development area is not appropriate at this stage.

Having considered the evidence, we are satisfied that the Tohill's land presents a unique situation. However, we also consider that further information would be required as to rezoning of land or identification of it for urban development, given the buffer that is provided between industrial land and smaller block rural land to the south west. Detailed consideration should be given to the function and form of the land in the immediate area as part of the district plan review, and Canterbury Regional Policy Statement review.

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We accept the officers' comment in this regard and we recommend amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Some land is now dissected by location and construction of CSM2 and more appropriate for industrial use.

**Hearing Panel discussion and recommendation:**

We refer to the above submission point.

The officers' position is that no new industrial areas are proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

We accept the officers' position and no changes are recommended as a result of this submission point.

**Spokes Canterbury (041)**

Suggests links are included to relevant documents – e.g. public transport routes, airport noise zone restrictions, urban boundaries, water shed protection areas.

**Hearing Panel discussion and recommendation:**

Officers noted that Figure 6 of Our Space identifies relevant plans, strategies and programmes, including the Regional Public Transport Plan, Canterbury Regional Policy Statement and District Plans.

We accept officers' position and no changes are recommended as a result of this submission point.

Suggests that where a proposal is not directly committed to by other documents (e.g. 10 minute neighbourhood, complete cycle networks), make this clear and call for support; make clear what has the legislative and policy backing to be implemented and what still needs to be done.

**Hearing Panel discussion and recommendation:**

Officers noted that the proposals will inform the review of other documents and the ongoing work as outlined in Section 6.2 which seek to progress the proposals in Our Space.

We accept officers' position and no changes are recommended as a result of this submission point.

Supports building higher density housing and commercial outlets on public transport routes and 10 minute neighbourhood concept – expand and apply these ideas better. Make sure neighbourhoods are close together and well connected by cycle networks.

**Hearing Panel discussion and recommendation:**

Officers referred to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. Officers did consider that better linkages could be made in Our Space as to the policy intent behind Key Activity Centres and the relationship with 10 minute neighbourhoods, and recommended changes to Section 5 of the Strategy. They also noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.

We are satisfied that these matters are adequately addressed in Our Space.

We accept the officers' position, and no changes are recommended as a result of this submission point.

Mandate cycle networks within and between neighbourhoods and towns.

**Hearing Panel discussion and recommendation:**

We heard from Mr Dirk De Lu who spoke on behalf of Spokes Canterbury in relation to this submission point. Mr De Lu is concerned that there is little mention of cycling, or transport mode choice, and funding for these is, in his view, inadequate.

Officers noted the submissions. They also said that the Christchurch City Council had invested, and is planning to continue to invest, significantly in developing improved cycle infrastructure.

No changes are recommended as a result of this submission point.

Drop greenfield developments which will only increase single occupancy vehicles; build housing where the jobs are; make sure higher density urban development offers features such as the 10 minute neighbourhood and affordability to attract residents.

**Hearing Panel discussion and recommendation:**

Mr De Lu said that does not focus on single occupancy cars, the impacts of sprawl, and not prioritising for climate change, sea level rise, and real sustainability. This leaves the members with real concerns that the plan will fail. It does not support the change needed to change people's habits or changing people's carbon emissions. Increasing urban density and providing for 10 minute neighbourhoods will help, but this will not be achieved by building on the fringe of the city. He said that affordability of living on the fringe of the city is not sustainable. He said that urban sprawl that requires subsidies from ratepayers is, in his view, not commercially feasible.

He said that it was important to put higher densities in the existing centres, and provide for jobs within those areas. Mr De Lu considered that the plan could reject the business as usual approach and deal with issues that arose out the earthquakes, by planning for development in the best places.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*), 7 (*Poor intensification outcomes and preferences to focus intensification in the central city*) and 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*).

Officers noted that Our Space seeks to ensure there will be sufficient, feasible development capacity in Greater Christchurch to meet demand over the medium and long term, and that this demand is met in a way that aligns with the strategic directions from the Urban Development Strategy. With this in mind, over 80% of the development capacity identified in Our Space is already zoned in district plans, either in existing urban area zonings that enable redevelopment at higher densities (45%) or in undeveloped greenfield areas (36%).

We note that in terms of planning for further development, that concepts such as the 10-minute neighbourhood can be worked into both greenfield and intensification proposals

We accept officers' position that no changes are recommended in response to this submission point.

Explore 'value capture' and make this a requirement in the plan.

**Hearing Panel discussion and recommendation:**

Officers noted this point. The said that Value Capture can be explored as part of a range of related business cases.

We accept the officers' position that no changes are recommended in response to this submission point

Our Space needs to take account of sea level rise.

**Hearing Panel discussion and recommendation:** Mr De Lu urged the Panel to consider future generations that have not yet been born, and raised concerns in relation to those areas subject to sea level rise. Spokes Canterbury considers that planning should be undertaken with a 100 year timeframe in mind and plan for sea level rise. In response to questions from the Panel, he said that provision should be made for managed retreat for sea-level rise.

Officers referred to their comments and recommendations outlined in Section 4 in relation to Theme 11 (*Addressing climate change and achieving sustainability and zero carbon goals*). Officers said that the proposed direction of Our Space are guided by the vision, principles and strategic goals in the Urban Development Strategy, especially in terms of the 'integrated and managed urban development' theme. This involves planning for risks from natural and other hazards, including those related to sea level rise and climate change. The Urban Development Strategy approach to addressing broader sustainability objectives could be referenced through additional wording in Section 4 and 5 of *Our Space*. They also noted that

climate change, and in particular sea level rise, is an integral part of the work undertaken by district councils related to coastal and river flooding issues.

We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

Concern that much of the land for greenfield development is agricultural.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (*Protecting productive/agricultural/high quality soils from urban expansion*). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of ‘integrated and managed urban development’ for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers’ position that no changes are recommended in response to this submission point.

**One Voice Te Reo Kotahi (OVTRK) Organising Group (042)**

Supports the submission from Sustainable Ōtautahi Christchurch.

**Hearing Panel discussion and recommendation:**

We refer to our recommendations in relation to the submission of Sustainable Ōtautahi Christchurch (#37).

Suggests the role of Third Sector Organisations as collaborative partners should be explicit in the document.

**Hearing Panel discussion and recommendation:**

Officers consider that the role of Third Sector Organisations as collaborative partners could be referred to more explicitly in Our Space. They recommend adding a reference to third sector organisations in the second para of section 6.3 beginning “Although the implementation...”.

We accept the officers’ position on this and recommend that it is amended accordingly.

**Red Spur Limited (043)**

Landowner seeks inclusion of additional land (outside the PIB) on Kennedys Bush Road, Christchurch.

**Hearing Panel discussion and recommendation:**

We accept the officers’ evidence in the hearing report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas for inclusion should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended as a result of this submission.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

**Hearing Panel discussion and recommendation:**

<p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (<i>Accuracy and uncertainties of projected demands</i>) in the officers' report.</p> <p>We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>5</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended as a result of this submission.</p>
<p>Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers said that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites (such as the example given in the submission) that may not presently be practical, economic or feasible to develop.</p> <p>We accept the officers' position that no changes are recommended in response to this submission point.</p>
<p>Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended as a result of this submission.</p>
<p>Proposes that Figure 16 should be included in District Plans rather than the CRPS.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended as a result of this submission.</p>
<p>Suggests that streamlined RMA processes be used to rezone the submitter's land.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We accept the officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.</p> <p>No changes are recommended as a result of this submission.</p>

**Simon Britten (044)**

<p>Seeks investment in active transport and public transport.</p>
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (<i>Transport needs and implications, including for public and active transport</i>). They noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.</p> <p>We accept the officers' position, and no changes are recommended as a result of this submission point.</p>

<sup>5</sup> Page 8 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

Need for a more supportive approach to creative affordable housing solutions with current rules a barrier.

**Officers' comment:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*). They noted that Our Space does not limit the potential for appropriate innovative housing options, such as tiny houses or adaptable new builds, nor mechanisms that enable partitioning of existing larger houses to create two households. Territorial authorities already have some planning provisions in this regard and can consider this further through subsequent district plan reviews and changes. They noted the comment regarding rule provisions in the Christchurch District Plan outside this process.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**Tony Dale (045)**

Predictions to 2048 are probably wrong.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) in the officers' report. They noted that In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

They noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term, it is in the apportionment by territorial authority that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Highly productive agricultural land should not be wasted.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (*Protecting productive/agricultural/high quality soils from urban expansion*). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of 'integrated and managed urban development' for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers' position that no changes are recommended in response to this submission point.

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Intensification north of Riccarton is occurring but need ways to encourage central city population rather than around suburban centres.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 (*Poor intensification outcomes and preferences to focus intensification in the Central City*). They said that the Capacity Assessment confirms that the existing provisions of the Christchurch District Plan are sufficient to accommodate such demand and that the Christchurch District Plan's zones and associated rules allow for a range of densities and housing types appropriate to their location (Central City, inner suburbs or outer suburbs).

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

They also observed that Christchurch City has many examples of high quality residential intensification. However, it is recognised that there are examples of poor outcomes resulting from past intensification, including poor urban design, amenity impacts (noise, car parking, etc) and reduced social cohesion. The reasons that lie behind this matter and the potential solutions that can ensure future higher quality intensification are many and varied and are best dealt with at a territorial authority level. It is also noted that improving intensification outcomes is currently a priority for the Government as it develops a new National Policy Statement on Quality Intensification.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Social and affordable housing could revitalise the city centre.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to theme 9 (*Provision of social and affordable housing, and a range of housing types*) in the officers report.

The submitters point is noted.

No changes are recommended as a result of this submission point.

Commercial activity should be directed towards the city centre rather than suburban centres.

**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers' recommendation. No changes are recommended as a result of this submission point.

Supports reversion of converted industrial premises in eastern Christchurch back to industrial use.

**Hearing Panel discussion and recommendation:**

Officers noted this, however considered this is outside the scope of Our Space.

We accept the officers' recommendation on this. No changes are recommended as a result of this submission point.

**Don Babe (046)**

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Encourage more of the growth within the Central City.

**Hearing Panel discussion and recommendation:**

We heard from Mr Don Babe in relation to his submission.

He considered there is too much emphasis on housing away from the central city in Selwyn and Waimakariri. A big issue was climate change, in particular issues with carbon as a result of transport, and a key way to address this is through density. He showed us a presentation that included a graph showing carbon created per person, compared to urban density. He considered that the a vibrant central city was needed, and for this it needed more people in it. A concentrated central city would have benefits such as agglomeration effects, but also social benefits as well. He considered that if people had a 20 minute bus ride, or a 10 minute walk from work to home, then this would have benefits.

Mr Babe also showed us costs of infrastructure costs from Halifax in Canada, that suburban costs approximately \$3000 per year to service infrastructure, compared to \$1000 per year for urban development. He admitted there were differences in what was funded, but even if the savings were half of what they were in Canada, there would still be significant savings. Mr Babe concluded that more housing needs to be met in the central city, rather than Rolleston or Rangiora.

In response to questions from the Panel, Mr Babe said that there was a significant amount of land in the central centre that could be upgraded, such as the area between Fitzgerald and Barbadoes Street. He noted sites that are land banked, and financial incentives need to be made so that land is developed. He said that while 70% of people live and work in Rangiora, there are another 30% that don't and they commute. He also said that people are changing in terms of their preferences, and migrants are used to much different densities.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the projections.

They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We note the principle behind the submission, and to that extent we accept it. However, no changes are proposed to Our Space as a result of the submission.

Less caveats on new development and development levy discounts for affordable housing.

**Hearing Panel discussion and recommendation:**

Officers noted this, however considered this is outside the scope of Our Space.

We accept the officers' recommendation. No changes are recommended as a result of this submission point.

2013 Census biased due to EQ work so cannot be relied upon.

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). They note that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space

reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances.

We accept that there is uncertainty in the projections. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood.

We are satisfied that no changes are recommended in relation to this submission.

Considers BAU approach needs to be tested in light of changes since the original strategy.

**Hearing Panel discussion and recommendation:**

Officers noted the comments, and that the proposals set out in Our Space are strongly guided by the vision and strategic goals from the Urban Development Strategy and the extensive planning framework that has already been developed for Greater Christchurch to support long term growth. They noted it focuses on responding to key growth issues for Greater Christchurch identified in Section 4 of Our Space. Section 6 recognises additional work is required to ensure the planning directions for the longer term are appropriately investigated and implemented and effectively respond to emerging drivers of change for Greater Christchurch.

We accept the officer's recommendation. No changes are recommended as a result of this submission point.

Does not fix the problems that remain or halt urban sprawl, better resolved through a common % increase in each area, meaning targets of 70k in Christchurch, 9k in Waimakariri and 7.6k in Selwyn.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 1 (*Accuracy and uncertainties of projected demands*) and 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officer reports. They note that *Our Space* allows for a greater share of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term, it is in the apportionment by territorial authority that *Our Space* differs from current projections.

We accept the officers' recommendation. No changes are recommended as a result of this submission point.

Most jobs in the central city impact travel and transport infrastructure from outlying areas.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*) in the officers' report.

This point is acknowledged.

No changes are recommended as a result of this submission point.

Transport, infrastructure, social, health and business agglomeration benefits of more housing in the city.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*).

This point is acknowledged.

No changes are recommended as a result of this submission point.

Carrot and stick approach needed to encourage more development in the city.

**Hearing Panel discussion and recommendation:**

This point is acknowledged.

No changes are recommended as a result of this submission point.

**Foddercube Products Limited (047)**

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Landowner seeks inclusion of additional land (outside PIB) on Springs Road on Christchurch Selwyn boundary. Some land is adjacent to the CSM2 and more appropriate for industrial use.

**Hearing Panel discussion and recommendation:**

We heard and considered the evidence provided by Ms Aston and Mr Speight on behalf of their client, Foddercube Products Limited. The land itself covers approximately 20 hectares and is located outside of the projected infrastructure boundary on the corner of Springs Road and Marshs Rd in South Hornby, adjoining existing industrial general zoned land.

Following questions from the Panel about the impact of the proposed development on rural amenity, Ms Aston did not consider the area to be critical as a buffer and considered it as a logical infill of industrial land.

Mr Speight identified that industrial land in Christchurch was held by a few owners, with a lack of supply of bare land, given that a lot of industrial land had been developed using 'design build sale' or 'design build lease' models, rather than sale of bare land. No proposal was put forward as to how this would be addressed for the subject land, nor that its ownership would necessarily be retained.

Officers' position is that the best time for consideration of what the future use of the land will be is as part of the full review of the Canterbury Regional Policy Statement in 2022. Generally, officers consider that given the over-supply of industrial land that provision of further industrial land as part of a future development area is not appropriate at this stage.

We do not consider that expansion of the future development area for industrial land to incorporate the submitters land to be appropriate. In this respect, we accept the recommendations of staff as set out in Section 4 Theme 4 of the officers' report. However, we do recommend amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No changes are recommended as a result of this submission.

We address the matter of flexibility around the provisions of the Canterbury Regional Policy Statement below.

Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology.

**Hearing Panel discussion and recommendation:**

We refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*).

While the submitter provided further information as to the nature of design build sale and lease forms of industrial land supply, no recommendations were made as to how this should be addressed in the methodology, or how the submitters land would be supply a different market. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the business land capacity and feasibility work done by Greater Christchurch to be an example of 'best practice'.<sup>6</sup>

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<sup>6</sup> Page 18 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

We are satisfied with the officers' position that no changes are required, noting that further refinement of the methodology may be undertaken as part of future capacity assessments as part of continual improvement.

No changes are recommended as a result of this submission.

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. By way of observation, we note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty for investment as to where land is appropriate to develop.

No changes are recommended as a result of this submission.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.

No changes are recommended as a result of this submission.

Suggests that streamlined RMA processes be used to rezone the submitter's land.

**Hearing Panel discussion and recommendation:**

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.

No changes are recommended as a result of this submission.

***Olly Powell (048)***

Questions need for growth and considers city to already be a good size and growth would impact this.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*).

They noted that the NPS-UDC requires the local authorities in Greater Christchurch to ensure there is sufficient development capacity to support projected population growth. This is explained in section 1 of Our Space. Further, Our Space does not propose any additional greenfield future development areas for Christchurch City (beyond those already identified in the Canterbury Regional Policy Statement and the Christchurch District Plan); therefore in this respect the city's urban boundary is not increasing in size, growth will be accommodated within existing areas of Christchurch City (primarily through intensification).

We accept the officers' recommendation. No changes are recommended as a result of this submission point.

***Transpower New Zealand Ltd (049)***

Impact on National Grid and giving effect to NPSET unclear, appropriate buffer from critical infrastructure.

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**Hearing Panel discussion and recommendation:**

Officers noted that the assessment of capacity of greenfield priority areas took account of Outline Development Plans, which show powerlines that are a constraint on development. For redevelopment in Christchurch City, the District Plan zones with the higher potential for redevelopment largely avoid powerlines. They noted that relatively small areas of Residential Suburban and Residential Hills zoned land are affected, however, the overall impact is considered to be minimal in the overall assessment of capacity. Officers therefore consider the requirements of Policy PB3(a) of the NPS-UDC have been met.

Officers do not consider it necessary to identify the location of National Grid transmission lines and substations on the maps in Our Space. This is consistent with the approach to (not identifying) telecommunications, water supply, wastewater or stormwater infrastructure networks or social infrastructure.

We accept the officers' recommendation. No changes are recommended as a result of this submission point.

***Grant Poultney (050)***

Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.

**Hearing Panel discussion and recommendation:**

We heard from Ms Jo Appleyard, counsel for Mrs Sue and Mr Grant Poultney. Ms Appleyard described previous mapping errors in relation to the Poultney's property at 353 Worsleys Road made in 1995, have subsequently informed district plan reviews and the development of Map A in the CRPS. Mr Poultney has engaged numerous times with the CCC for the error to be corrected. Mr Poultney submitted on the Christchurch District Plan, however the Independent Hearing Panel was unable to make the changes requested.

Mr Poultney is concerned about being deferred to later resource management processes, which has happened in the past, and seeks the ability to place two dwellings on the flat part of the property. Our Space is an important document for the CRPS review and will have significant implications. Ms Appleyard noted that the CCC's technical advice supported the inclusion of Mr Poultney's land. She highlighted that the officers' report does not recommend any changes to Our Space to recognise the Poultney's land.

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report.

They said that the points made in the submission relating to an alleged historical error in the zoning of this property are noted. However, officers consider that the merits of any amendments required to Map A to address this are more appropriately considered through an RMA process.

We agree with the Officers' position. However, we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

***Suburban Estates Ltd, Sovereign Palms Ltd and Doncaster Developments (051)***

Considers the approach does not meet market demand or lifestyle preferences of development in the districts and that the NPS-UDC does not support the directive or coercive approach to the provision of feasible development capacity. Identifies risk that NPS-UDC policies will not be given effect to.

**Hearing Panel discussion and recommendation:**

We heard evidence and legal submissions from Ms Pru Steven counsel for the submitter, Mr Adam Thompson, Mr Kim Sanders, company engineer for Suburban Estates, Mr Bruce Thompson, planner, and Mr Regan Smith for Suburban Estates Limited.

Officers noted that Our Space is guided by the vision, principles and strategic goals of the Urban Development Strategy, which were developed after extensive consultation and represent the collective

aspirations and preferences of people in Greater Christchurch. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of 'integrated and managed urban development' for the purposes of this document.

Officers consider the approach is consistent with the NPS-UDC and associated guidance. Policy PC9 of the NPS-UDC provides that territorial authorities shall set minimum targets in accordance with the Capacity Assessment under Policy PB1, and with Policies PA1, PC1 or PC2, and PD3. Policy PD3 states that local authorities that share jurisdiction over an urban area are strongly encouraged to collaborate and cooperate to agree upon the specification of the minimum targets required under PC5 and PC9 and their review under policies PC6, PC7 and PC10. This indicates that local authorities have discretion to agree upon a territorial authority target that is different from the Capacity Assessment, provided that the aggregated targets are not less than the regional minimum target, and that other requirements of the NPS-UDC are met.

They also said that as required by the NPS-UDC, market indicators will be monitored on a frequent basis and the housing and business development capacity assessment will be updated every three years. This will ensure an up to date base of information is available and enable spatial planning decisions to be responsive to changing population and household projections as well as changes in market conditions and other relevant factors. The housing and business development capacity assessments will provide a clear evidential basis for understanding the amount of feasible development capacity that has been enabled and what additional capacity is required in different locations.

Ms Steven submitted to us that Our Space fails to give effect to Policy PA3 of the NPS-UDC as it is not sufficiently responsive to the type or the market of housing in Waimakariri and Selwyn Districts. Ms Steven adopted the submissions of Mr Fuller in this respect where he referred to the requirement for housing choices that meet the needs of the people.

We disagree that Policy PA3 should be read in this manner. We must provide for the social, cultural, and environmental wellbeing of people and communities, but in doing so, we have particular regard to those matters set out in PA3(a)-(c). It does not require that we meet demand in micro-markets in all locations. If that were the case, we would be directing intensification to all high demand areas, such as more expensive suburbs within the city.

This is where the evidence of Mr Adam Thompson was incorrectly focussed at a local level. We note that Mr Thompson's assessments were narrow, based solely on supply within specific townships. We take a broader, and more strategic view, and consider that it is appropriate to look wider across all of Greater Christchurch. To that extent, it is only the officers who have provided an analysis of the entire area.

We are satisfied with the officers recommendations and reasons in this respect. We accept the officers' recommendation on this matter, and no changes are recommended as a result of this submission point.

Seeks that the Projected Infrastructure Boundary / Urban Limit lines be removed from the update, the CRPS and other planning documents.

Officers said that Map A was inserted into the Canterbury Regional Policy Statement through the Land Use Recovery Plan, having previously been included in Plan Change 1 to the Canterbury Regional Policy Statement. They said that the projected infrastructure boundary gives infrastructure providers certainty around where growth will be focused, for forward planning and infrastructure planning purposes. Officers consider this remains an appropriate mechanism to ensure the strategic integration of infrastructure with urban activities and the attainment of the intensification and consolidation objectives of Chapter 6 in the Canterbury Regional Policy Statement. Officers considered that the appropriate process to consider the merits of such a policy change is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

While that may be a matter that could be considered through the Canterbury Regional Policy Statement review, we consider that there are strong reasons for containment of urban activities in order to achieve the vision and principles of the Urban Development Strategy. We received many submissions concerned with the effects of more greenfield development. We are satisfied at this time that sufficient feasible development capacity can be provided within this framework and that the ongoing monitoring and review required by the NPS-UDC and signalled in the schedule of further work in Section 6.2 balances the certainty

regarding the provision of future urban development with the need to be responsive to demand for such development as required by Policy PC13(b) of the NPS-UDC.

We accept the officers' recommendation and no changes are recommended as a result of this submission point.

Seeks inclusion of additional land (outside the PIB) in north-west Rangiora and south-west Prebbleton.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report.

The point made in the submission relating to an alleged historical error in the zoning of the northwest Rangiora land is noted. However, given its use for rural residential purposes, which is what the Residential 4a and 4b zones are, it is difficult to understand what the error is.

Officers consider that the merits of any amendments required to Map A to address this are more appropriately considered through an RMA process.

We accept the officers' recommendation on this matter, and recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Expresses concern that the approach in Our Space is too directive, and that the 'deferred status' should be removed from land identified for development and a move to higher densities of housing be supported and facilitated but not required or directed through statutory plans.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) and 6 (*Sequencing and staging of greenfield land*). They note that Our Space identifies sufficient, feasible development capacity to meet demand but considers that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas.

We continue to support the use of minimum densities. Submissions in relation to those can be considered as part of the review to the Canterbury Regional Policy Statement in 2022.

We accept the officers' recommendation and no changes are recommended as a result of this submission point.

Seeks that the future development area identified in Kaiapoi is a Greenfield Priority Area.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (*Sequencing and staging of greenfield land*) in the officers' report.

Officers addressed this matter in their Reply Report and explained the reasons why proposed future development areas are included in Our Space rather than greenfield priority areas. We agree with the response provided by Officers..

No changes are recommended as a result of this submission point.

Areas of Christchurch existing zoned land to remain undeveloped due to geotechnical remediation costs.

**Hearing Panel discussion and recommendation:**

No evidence has been provided to support this submission point. A number of greenfield areas have been economically remediated and bought up to TC2 equivalent. Assessment and allowances for site conditions are as set-out in the Harrison Grierson report: "Development Feasibility Assessment – Greenfields". For the assessment of redevelopment feasibility in Christchurch City, the foundation cost assumption was adjusted to reflect the Technical Category of each tested development site.

Notwithstanding that, monitoring will determine whether shortfalls in planned development exist. This can feed into future capacity assessment noting uptake.

No changes are recommended as a result of this submission point.

### ***Woolworths New Zealand Limited (052)***

Landowner seeks inclusion of additional land (outside the PIB) cnr of Marshlands/Prestons Road, Christchurch.

#### **Hearing Panel discussion and recommendation:**

We heard and considered the evidence of Mr Chrystal on behalf of Woolworths New Zealand Limited. Mr Chrystal is concerned that the Our Space document will form an extremely strong direction through later RMA processes such as the review of the Canterbury Regional Policy Statement. He noted that in relation to those processes, it is his view that the proposed extension will most certainly be declined as it is not consistent with Our Space, and then it would become a circular argument. He told us he was concerned that in relation to Woolworth's submission, that officers had recommended that there was sufficient inner city industrial land available to transition to commercial use to meet the cities long term needs. He noted that the central city was a completely different market to that land at Prestons. He did not consider that there were 'other methods' available to locate a supermarket, as they have specific land needs (approximately 2 hectares for carparking etc.). He did not consider that a supermarket would have distributional effects on surrounding key activity centres or the central city.

In relation to the second part of the submission, Mr Chrystal noted that the submission sought a review of identified commercial areas as part of the comprehensive Canterbury Regional Policy Statement review. Consideration needs to be given as to where projected commercial growth will occur, whether existing identified but undeveloped commercial activity remains appropriately zoned, and whether the hierarchy of centres remains appropriate. He said that the difficulty with the Capacity Assessment is that it has not been ground truthed and has been a desktop analysis.

The officers' position on the submission is that at present, sufficient capacity is identified to meet short term needs in the north, and also notes that shortfalls in the long term will be met through transitioning of industrial land in the inner city over time. We understand that this was not to say that Woolworths should be setting up further supermarkets in the central city; rather that the wider business market could be catered for in the long term through the conversion of industrial land.

Mr Chrystal was not able to provide any information on the need for local shopping services, nor any updated traffic information in support of identification of the land for commercial use. This will be impacted by changes from the Northern Arterial route currently under construction. We accept that there may be difficulties with provision of residential activities on commercial zoned land, but at the same time consider that changes to the urban area need to be supported by wider analysis of business development in the north. We accept the officers' position that opportunity needs to be provided for development of the Key Activity Centre at Northwood/Belfast, and that the proper opportunity to address this further is as part of the future review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended as a result of this submission.

Land has opportunities for commercial and residential development.

#### **Hearing Panel discussion and recommendation:**

Officers noted this matter. We refer to our reasons set out above.

No changes are recommended as a result of this submission.

### ***Cockburn Family Trust (053)***

Landowner seeks inclusion of land (inside the PIB) for industrial use at Hoskyns Road, Rolleston. Land, adjacent to I-Zone, is within PIB but not identified as a Greenfield Priority Business area in the CRPS.

#### **Hearing Panel discussion and recommendation:**

We heard from Mr Chrystal (who also presented in relation to the statement of evidence from Mr Beresford regarding industrial real estate matters) in relation to the submitter's 49.2 hectare block of land at Rolleston, which is inside the Projected Infrastructure Boundary, but is not identified as a Future Development Area or Greenfield Priority Area.

Mr Chrystal talked to us about matters that are similar to those for Rolleston Industrial Holdings (refer submission 073). That included land that was able to be purchased as vacant land, and the importance of access to the rail network. He also highlighted what he considered to be discrepancies with identification of vacant land, which he did not consider properly reflected vacant business land.

We didn't hear any evidence regarding the makeup of business located next to rail sidings or with access to the rail network, nor whether specific land was being set aside for those business that require rail transport modes. Better understanding is required as to the demand for this type of development with access to the rail network, and the potential impact that releasing more industrial land will have on the viability of existing centres. As such, we consider the Greater Christchurch Partnership should look to refine its methodology for industrial business land by considering, as part of future capacity assessments, the impact of modal shift (from road to rail) on demand. We consider that this is important in respect of Objective 5.2.1 and 6.2.1. and 6.2.4. of the Canterbury Regional Policy Statement regarding integrating land use and infrastructure under.

It appeared to us that the identification of the land as a future development area (or not) was a matter of timing. As we mention above, further work may also need to be done around particular industrial activities with locational needs such as the rail network (including consideration of areas served by rail elsewhere in the city).

We note that the land has specific infrastructure requirements associated with the rail network. We also note that an over-supply of specific types of industrial land should not be compared in the same way as an oversupply of residentially zoned land, which has the potential to impact on residential intensification objectives and targets in the central city and key activity centres, although they may have an impact on maintaining a compact urban form. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

We accept in part the submitter's request, to the extent of our recommendations for Environment Canterbury to engage with the landowner and for the local authorities to consider the relationship of transport modes to demand in specific locations as part of future capacity assessments.

### **Grassmere Residents (054)**

Should develop land in the City first to create density and vibrancy.

#### **Hearing Panel discussion and recommendation:**

Ms Ngaire Button, Mr Ryan Geddes, Mr Stuart Mitchell, Mr John Button and Mrs Ann and Mr Mike Toth appeared on behalf of the Grassmere Residents

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*).

We accept that it is appropriate that both greenfield development and infill should take place contemporaneously.

No changes are recommended as a result of this submission point.

Take care not to build on land suited for growing food.

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**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 3 (*Protecting productive/agricultural/high quality soils from urban expansion*). Officers noted that the role of Our Space is to ensure there is sufficient land available to support future housing and business demand, and that this demand is supported in a way that aligns with the wider strategic directions of the Urban Development Strategy. Section 2.3 of Our Space highlights these strategic directions, having particular regard for the theme of ‘integrated and managed urban development’ for the purposes of this document.

While some areas within Future Development Areas contained versatile soils, additional guidance is required at a national level before this matter is addressed. This may be a matter which impacts on net density as a result of the 2022 review of the Canterbury Regional Policy Statement, if such soils are to be protected at a national level.

We accept the officers’ position that no changes are recommended in response to this submission point.

Partner with Government to help finance affordable housing.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to theme 9 (*Provision of social and affordable housing and a range of housing types*), and reporting officers’ reply report (question 8). Officers said that Christchurch City Council, working in partnership with the Ōtautahi Community Housing Trust, has a substantial social housing stock, while Selwyn District Council has recently agreed a policy approach that fosters social and affordable housing but does not entail any direct provision. Nationally, they noted new Government initiatives such as KiwiBuild can complement and support the work locally undertaken by housing providers. We were also told of the use of incentives in Queenstown regarding inclusionary housing in relation to the submission of Te Waipounamu Affordable Housing Network. An action plan to look at social and affordable housing is included in Our Space.

We accept the officers’ recommendations and do not recommend any changes as a result of this submission point.

More extensive use of development contributions to build infrastructure.

**Hearing Panel discussion and recommendation:**

Officers noted the comment, but considered that this submission point falls outside the scope of Our Space. We do, however, encourage the submitter to make submissions on the Annual Plan. In addition, we recommend that Christchurch City Council consider whether there are any options or alternatives available to facilitate, fund or enable infrastructure development at Cranford Basin, that was the subject of the Cranford Basin Regeneration Plan.

***Hughes Developments Limited (055)***

Provision of additional greenfield land in Rolleston is essential.

**Hearing Panel discussion and recommendation:**

We heard from Mr Mark Brown, a planner, and Mr Jake Hughes for Hughes Developments Limited. Mr Brown described the land development of Hughes Developments Limited, including Faringdon in Rolleston. He described how addition of Faringdon South wasn’t successful through the Land Use Recovery Plan, but was later added as a Special Housing Area. The submitter supports the identification of actions to address medium term shortfalls in Rolleston, however they consider that there is uncertainty around demand and capacity identified in the capacity assessment. Mr Brown described how the minimum densities are not supported at 15 households per hectare, nor do they support maximum caps as a means of sequencing.

Officers said that Our Space proposes that some new greenfield housing areas should be released in Rolleston to help address projected housing capacity shortfalls for Selwyn over the medium to long term (Section 5 of Our Space).

No changes are recommended as a result of this submission point.

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Current supply levels identified in the capacity assessments potentially do not reflect what is actually happening.

**Officers' comment:**

In response to questions from the Panel, Mr Brown considered that the capacity assessment was highly driven by score analysis, and that analysis about how things look on the ground should be undertaken. He also noted the lag of land being identified, through to houses getting on the land. In relation to land at Rolleston, he did not think that growth and uptake was being accurately portrayed. In terms of their yield to date, yield was around 12-13 households per hectare. He said that demand for different densities had varied, and they responded accordingly. In relation to responding to demand, Mr Brown noted that they responded to this by looking at sales, then adjusting subdivisions that are underway. He noted they were moving away from the more intense super lot development.

Officers noted that the capacity assessment will be reviewed every 3 years and can be updated to reflect recent developments and changes in terms of the provision of infrastructure.

We accept the officers' position, and note that future capacity assessments will provide for a responsive planning framework in relation to any action undertaken. No changes are recommended as a result of this submission point.

**Graeme Alan and Joy Yvonne McVicar (056)**

Landowner seeks inclusion of additional land (outside the PIB) on Worsleys Road, Christchurch.

**Hearing Panel discussion and recommendation:**

We accept the officers' response in Section 4 Theme 4 in the Officers Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

Officers consider that the appropriate consideration of further areas for inclusion should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended as a result of this submission point.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) in the officers' report.

We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of "best practice".<sup>7</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended as a result of this submission.

Suggests that some existing zoned hill areas will not be practical, economic or feasible to develop.

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<sup>7</sup> Page 8 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

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**Hearing Panel discussion and recommendation:**

Officers said that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites (such as the example given in the submission) that may not presently be practical, economic or feasible to develop.

We accept the officers' position and no changes are recommended in response to this submission point.

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.

No changes are recommended as a result of this submission.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended as a result of this submission.

Suggests that streamlined RMA processes be used to rezone the submitter's land.

**Hearing Panel discussion and recommendation:**

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act processes.

No changes are recommended as a result of this submission.

***B. Welsh, S. McArthur, T. Kain (057)***

Landowner seeks inclusion of additional land (outside the PIB) in NW Belfast, Christchurch.

**Hearing Panel discussion and recommendation:**

We accept the officers' evidence in the hearing report which is set out in Section 4 Theme 4. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed previously, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended as a result of this submission point.

***Canterbury District Health Board (058)***

Need to ensure greenfield development enables easy access to core amenities, nearby public services and employment opportunities.

**Hearing Panel discussion and recommendation:**

We heard from Dr Anna Stevenson in relation to the CDHB submission. Dr Stevenson noted that in general, Our Space is supported, but that the CDHB considered that there were some areas that required some more emphasis. She considered more needed to be included about intergenerational equity, and that uncertainty

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is recognised. This provides the ability to be able to monitor and respond to change. She considered there needed to be more emphasis on the challenges associated with aging, as well as other wellbeing impacts. In addition, she considered that the impact of greenfield development was more nuanced than just dealing with congestion. Dr Stevenson noted issues with affordability now and into the future, and the need to address this through better refined actions. She also highlighted the importance of the protection of drinking water, and sought greater emphasis on climate change. The CDHB supported the 10-minute neighbourhood concept and the way this tied into the key activity centre approach. She said that the CDHB strongly supports the relationships between partners to ensure the ability to move forward together, and to enable the Partnership to be responsive.

Following the close of the hearing, Ms Stevenson provided us with some recommended wording in relation to Our Space, which officers commented on and responded to.

We accept the officers' recommendations for the reasons set out in their response.

Supports 10 minute community diagram but notes not specifically identified for implementation.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Supports a range of housing types and housing being close to existing centres; housing should be good quality, affordable, accessible and in a location that builds community; encourage universal design principles to ensure homes are suitable for all ages and stages.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Supports the focus of commercial development around existing centres and encourages a focus on employment opportunities for people who live in the area and placement of public services within these areas.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Evidence provided by capacity assessment should be supplemented by information from communities on what they want and need.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Considers densities around key centres to be key to the success of Our Space.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Suggests the document makes a clear statement as to the importance of building strong, connected neighbourhoods using the 10 minute neighbourhood as an example.

**Hearing Panel discussion and recommendation:**

Refer to the above.

Notes that specific populations may require additional resourcing for active and public transport infrastructure e.g. Eastern areas of Christchurch.

**Hearing Panel discussion and recommendation:**

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We accept the officers' recommendations for the reasons set out in their response.

Encourages infrastructure planning to be clearly articulated in Our Space including how other plans or strategies might contribute e.g. linking into community knowledge, signalling spaces and places for park and ride options so these can exist around existing infrastructure.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

Considers Our Space does not deal strongly with natural capacity and resource sustainability, and suggests there could be stronger links to zero carbon plans.

**Hearing Panel discussion and recommendation:**

We accept the officers' recommendations for the reasons set out in their response.

**Ernst Frei (059)**

Landowner seeks inclusion of additional land (outside the PIB) on Cashmere Road, Christchurch.

**Hearing Panel discussion and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

Mr Frei owns land at 564 Cashmere Road. Part of the site is zoned New Neighbourhood in the Christchurch District Plan. Mr Frei seeks further development of the site. Mr Frei emphasised that the addition to the existing zoned area would amount to approximately two rows of houses which he considered very small. Mr Fox told us that it was not economically viable to undertake the development of just 25 lots, and that it needed to get to the 50 lots to be economically viable. **The land sought to be rezoned lies within the Henderson Basin ponding area.** Ms Aston explained how compensatory storage can be formed to overcome this.

The officers' report did not agree to adding further future development areas, on the basis that sufficient capacity is provided for in the existing Christchurch district plan area. However, a report prepared by the Christchurch City Council<sup>8</sup> did consider that there was merit in considering three additional areas on the basis that these landholdings are:

- Small-scale;
- Have no servicing constraints;
- Are considered feasible to develop by the landowners; and
- Support urban consolidation (and other key objectives) of the Canterbury Regional Policy Statement

We did not have the opportunity to test the authors on those criteria, as they did not appear as witnesses. Christchurch City Council has indicated that it does support considering the three areas by way of changing the Canterbury Regional Policy Statement.

Having considered the information filed with us by the Christchurch City Council, the officers' report, and the evidence of Ms Aston and Mr Fox, and we consider that this land should be investigated further as part of the full review of the Canterbury Regional Policy Statement in 2022.

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<sup>8</sup> Appendix E, Supplementary technical advice in support of the Christchurch City Council's submission, dated 15 February 2019, by Mr David Falconer, Ms Sarah Oliver and Ms Adele Radburnd

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We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

**Hearing Panel discussion and recommendation:**

No recommendations were made by the submitter as to how this should be addressed in the housing capacity methodology. We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>9</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended as a result of this submission.

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

**Hearing Panel discussion and recommendation:**

We accept officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.

No changes are recommended as a result of this submission.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022.

No changes are recommended as a result of this submission.

Suggests that streamlined RMA processes be used to rezone the submitter's land.

**Hearing Panel discussion and recommendation:**

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.

No changes are recommended as a result of this submission.

**GFR Rhodes Estate & Larson Group (060)**

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<sup>9</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

Landowner seeks inclusion of additional land (outside the PIB) in Prebbleton.
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We heard from Mr Peter Fuller, counsel for the submitter, Mr Adam Thompson, an economist, and Ms Aston for GFR Rhodes Estate and Larson Group. Mr Fuller’s legal submissions and Mr Thompson’s economic evidence were based on the premise that growth had to be provided for in relation to all communities. We refer to our assessment in relation to submission 51.</p> <p>We accept the officers’ position set out in Section 4 Theme 4. Of the Officers’ Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and Greater Christchurch. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.</p> <p>We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.</p> <p>No further changes are recommended as a result of this submission.</p>
Propose zoning for smaller more affordable sections based on Urban Economics assessment of Prebbleton.
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We refer to the evaluation above and accept that officers’ report discussion set out in Section 4, Theme 4. No changes are recommended as a result of this submission point.</p>
Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (<i>Accuracy and uncertainties of projected demands</i>) in the officers’ report.</p> <p>We accept the officers’ position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment’s report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater Christchurch to be an example of ‘best practice’.<sup>10</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.</p> <p>No changes are recommended as a result of this submission.</p>
Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.
<p><b>Hearing Panel discussion and recommendation:</b></p> <p>We accept the officers’ position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.</p> <p>No changes are recommended as a result of this submission.</p>
Proposes that Figure 16 should be included in District Plans rather than the CRPS.
<p>We accept the officers’ position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended as a result of this submission.</p>
Suggests that streamlined RMA processes be used to rezone the submitter’s land.

<sup>10</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

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**Hearing Panel discussion and recommendation:**

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.

No changes are recommended as a result of this submission.

***Martin Pinkham (061)***

Sees a lack of long term planning in Waimakariri and a need for standalone infrastructure authorities.

Mr Pinkham appeared before us and presented his submission. He spoke to us about the lack of integration of transport infrastructure and land use in the Greater Christchurch area.. He said that Christchurch had sat on its hands and not created a credible case for transport funding. He considered the lack of development of a Council Controlled Organisation to manage transport had been a disaster. He said there was a major disconnect between transport planning and Our Space.

Officers noted this submission point and said that Waimakariri Council does have a District Development Strategy and is working on structure planning for new residential areas in Rangiora and Kaiapoi and an update to the Rangiora Town Centre Strategy. Officers did not recommend any changes in response to the submission.

No changes are recommended in relation to this submission point.

Lower development contributions, more apartments, improved legislation to improve housing affordability.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing and a range of housing types*) in the officers' report. We note that a social and affordable housing action plan is to be developed, which may address some of the submitters concerns. Matters such as development contributions are a matter for annual plan processes.

No changes are recommended as a result of this submission point.

***Townsend Fields Limited (062)***

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.

Officers noted supported.

No changes are recommended as a result of this submission.

Greenfield priority area should be rezoned ahead of identified future urban areas.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

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### **Carolina Homes Limited (063)**

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.
Officers noted supported.
No changes are recommended as a result of this submission.
Greenfield priority area should be rezoned ahead of identified future urban areas.
<b>Hearing Panel discussion and recommendation:</b> Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 ( <i>Sequencing and staging of greenfield land</i> ) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1). We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

### **Riccarton Bush Kilmarnock Residents Association (064)**

Considers future projections beyond 2030 based on data sets to be risky approach.
<b>Hearing Panel discussion and recommendation:</b> Officers referred to comments and recommendation outlined in Section 4 in relation to theme 1 ( <i>Accuracy and uncertainties of projected demands</i> ) in the officers' report. They noted that Statistics NZ incorporate immigration forecasts in the population projections and this remains the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to such changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach. We accept the officers' recommendations and do not recommend any changes as a result of this submission point.
Intensification in existing areas ongoing, such as Riccarton, but no on-site parking causes problems, including health and safety issues.
<b>Hearing Panel discussion and recommendation:</b> Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the central city</i> ). We note that on-site parking is a matter for the district plan to consider. No changes are recommended as a result of this submission.
Avoid large medium density communities due to potential social problems.
<b>Hearing Panel discussion and recommendation:</b> Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 7 ( <i>Poor intensification outcomes and preferences to focus intensification in the Central City</i> ). They said that the Capacity Assessment confirms that the existing provisions of the Christchurch District Plan are sufficient to accommodate such demand and that the Plan's zones and associated rules allow for a range of densities and housing types appropriate to their location (Central City, inner suburbs or outer suburbs).

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

They also observed that Christchurch City has many examples of high quality residential intensification. However, it is recognised that there are examples of poor outcomes resulting from past intensification, including poor urban design, amenity impacts (noise, car parking, etc) and reduced social cohesion. The reasons that lie behind this matter and the potential solutions that can ensure future higher quality intensification are many and varied and are best dealt with at a territorial authority level. It is also noted that this improving intensification outcomes is currently a priority for the Government as it develops a new National Policy Statement on Quality Intensification.

We adopt the officers' recommendations and do not recommend any changes as a result of this submission point.

Disagree with one-size-fits-all approach to greater living densities around key centres.

**Hearing Panel discussion and recommendation:**

We refer to the submission point above in relation to Section 4, Theme 7 of the officers' report. No changes are recommended as a result of this submission.

Difficult and expensive to impose a comprehensive new public transport system with low current patronage.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 6 (*Transport needs and implications, including for public and active transport*). They noted that Our Space is principally focussed on the land use component of settlement planning, and that transport matters are addressed in other plans such as the Regional Land Transport Plan and Regional Public Transport Plan.

We adopt the officers' recommendations and do not recommend any changes as a result of this submission point.

Still a reliance on cars and plans should be more pragmatic and realistic.

**Hearing Panel discussion and recommendation:**

We refer to the submission point above in respect of Section 4, Theme 6. No changes are recommended as a result of this submission.

***Scarborough Hill Properties Ltd and Directors/Shareholders Ruth Kendall & Ewan Carr (065)***

Landowner seeks inclusion of additional land (outside the PIB) in Scarborough, Christchurch.

**Hearing Panel discussion and recommendation:**

Ms Juliette Derry, counsel for the submitters, and Mr Ewan Carr presented the submission for Scarborough Hill Properties. Part of the submitters site lies within the Residential Port Hills zone, while part is zoned Rural Port Hills. The submission seeks that the Our Space strategy does not preclude the inclusion of additional land outside of the urban boundary. Mr Carr discussed his vision for the block. Mr Carr described the property, being the residual area of the original farm, which included fire access. He considers that residential use on the site (such as high-end larger lots with revegetation) is a relatively natural progression for the urban edge and should not be constrained, and the site is already connected to services which fun from Godley Drive. At present the site has little economic use for running stock on the land, and caters for about 100 stock units, essentially running at a loss.

In response to questions from the Panel, Mr Carr described how in 1999, work done by Davis Ogilvie estimated a yield of approximately 200 sites from the development. He acknowledged there are issues with the road (Scarborough Road), but

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that Richmond Road had similar issues but was only one way, and yet approximately 150 additional sites were allowed. Mr Carr talked about the ability to merge with the hillside. He mentioned that there might be the opportunity to have a thoroughfare through the site for walking and pedestrian access up to Godley Head Road.

We accept the officers' recommendations set out in Section 4 Theme 4 of the Officers' Report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended as a result of this submission point.

Concern that uncertainties will mean identified development opportunities will not be realised.

**Hearing Panel discussion and recommendation:**

Officers noted that the assessment of sufficiency of housing development capacity underpinning Our Space includes an additional capacity margin as required by the NPS-UDC, to account for sites that may not presently be feasible to develop.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Lacks flexibility to accommodate all needs and/or future market changes.

**Hearing Panel discussion and recommendation:**

Officers noted that Our Space highlights how changing demographics and affordability will likely affect future housing demand in Greater Christchurch, with growing demand for smaller, more affordable housing. Section 6 highlights the key role of ongoing monitoring of household trends and further investigation of opportunities to encourage the provision and uptake of a range of housing types to meet future demands. District plan provisions play an important role in helping to deliver a broad range of housing types.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

### **AgResearch (066)**

Need to provide sufficient buffer between research farms and urban development.

**Hearing Panel discussion and recommendation:**

Officers noted the submission point.

No changes are recommended in relation to this submission point.

Maintain PIB in current proposed position for Rolleston and Lincoln.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

Our Space does not propose any changes to the projected infrastructure boundary.

No changes are recommended in relation to this submission point.

### **Lyttelton Port Company (067)**

Seeks extension of urban limits (PIB) to account for port reclamation area.

**Hearing Panel discussion and recommendation:**

Ms Appleyard described the process of reclaimed land becoming formally 'land' for the purpose of planning documents, and the consequences for resource consent applications for land use activities. She said that the Port was essentially an industrial activity, in the CRPS, and therefore could be considered an urban

activity. She acknowledged that the officers had recommended changes to the Existing Urban Area be considered as part of the review of the CRPS.

The geographic extent of Greater Christchurch, for the purposes of Chapter 6 of the CRPS and Our Space, is the area shown on Map A. As the future reclamation site is not yet 'land' it is not within the territorial authority boundaries shown on Map A. As such, the future reclamation site is located outside of the area shown on Map A and therefore the provisions of Chapter 6 of the CRPS do not apply. Likewise, the future reclamation site sits outside the geographic area of focus for Our Space. On that basis, we do not consider Our Space or Chapter 6 of the CRPS to be an impediment to activities on the future reclamation site and do not consider it necessary, or appropriate, to identify the future reclamation site in Our Space.

Officers consider that the appropriate process to consider any alteration to the Projected Infrastructure Boundary is during the review of the Canterbury Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

We are satisfied that the officers recommendation is appropriate, and no changes are recommended as a result of this submission point.

Seeks that sensitive activities are avoided in any development adjacent to the Midland Port facility in Rolleston.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure and integration with development*) of the officers' report, and the reporting officers' reply report (question 7). They noted that the protection of key infrastructure (such as the port and airport operations, and railway network) from the adverse effects arising from development is considered to already be well-managed by the existing planning framework, including through Chapter 6 of the Canterbury Regional Policy Statement and district plans. Given the proposals in Our Space do not deviate from the growth strategy that has been in place for Greater Christchurch for some time, the proposals are not expected to have significant adverse effects on key infrastructure and therefore have only been briefly referenced.

We accept the officers' recommendation, and no changes are recommended as a result of this submission point.

Include strategic freight routes and upgrading of the Brougham Street section of SH76 and possible Lyttelton freight tunnel.

**Officers' comment:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Themes 5 (*Transport needs and implications, including public transport*) and 10 (*Provision and protection of key infrastructure and integration with development*), and the reporting officers' reply report (question 7).

Officers noted that the strategic road and rail networks have been identified in the Business Capacity Assessment which informs Our Space but could be included in a final Our Space document. Constraints with SH76 are identified in the Business Capacity Assessment which informs Our Space. They also said that further investment options are better investigated through Land Transport Management Act processes.

Officers did recommend amending wording for Section 5.6 to provide greater explanation of freight hubs/networks and strategic infrastructure, with potential identification in Figure 18.

We accept the officers' recommendation and recommend that Our Space be amended accordingly.

Highlight constraints on rail network impacting freight now and into the future with expected growth.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*) in the officers' report. Officers consider the vision, strategic direction and work underway to implement the intent of recently updated transport plans, such as the Regional Land Transport Plan and Regional Public Transport Plan, will provide appropriate land use and transport integration to support the consolidated urban form outlined in Our Space. Our Space is principally focused on the land use component of settlement planning and will need to monitor and review the implementation of such plans as part of subsequent capacity assessments.

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We accept the officers' recommendation, and no changes are recommended as a result of this submission point.

Supports roading overpass proposed at Rolleston.

**Officers' comment:**

Noted. Refer to the submission point above.

No changes are recommended as a result of this submission point.

**Central City Business Association (068)**

Opposes the proposed changes to the settlement plan as it will undermine the recovery of Christchurch, particularly in terms of the rebuild and revitalisation of the Central City.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*).

They said that the submission notes that the Central City Business Association (CCBA) is opposed to the proposed changes to the Greater Christchurch settlement pattern, but does not indicate what changes in particular the submission opposes. This makes it difficult to directly respond to the submission.

We agree that the submission lacks specificity.

No changes are recommended a result of this submission.

Fully supports the ChristchurchNZ/Development Christchurch Ltd submission (Submission 077).

**Hearing Panel discussion and recommendation:**

We refer to our discussion and recommendation in respect of submission 77.

**Lincoln Developments Ltd (069)**

Landowner seeks inclusion of additional land (outside the PIB) in north Lincoln.

**Hearing Panel discussion and recommendation:**

We accept the officers' evidence in set out in Section 4 Theme 4 of the officers' report. This outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas is during the review of the Canterbury Regional Policy Statement in 2022.

We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

No further changes are recommended as a result of this submission.

Considers capacity assessment targets to be uncertain, inaccurate and based on a flawed methodology.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*) in the officers' report.

We accept the officers' position that the capacity assessment is sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, that it considered that the housing demand assessment undertaken by Greater

Christchurch to be an example of 'best practice'.<sup>11</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended as a result of this submission.

Proposes the inclusion of a new policy in Chapter 6 of the CRPS to provide flexibility to develop outside the urban boundary where certain criteria are met.

**Hearing Panel discussion and recommendation:**

We accept the officers' position that it is appropriate to consider such matters as part of the review of the Canterbury Regional Policy Statement in 2022. This review is identified in Section 6.2 in the schedule of future work. We note that the changes sought by the submitter to Chapter 6 would provide significantly less certainty and guidance for investment as to where land is appropriate to develop.

No changes are recommended as a result of this submission.

Proposes that Figure 16 should be included in District Plans rather than the CRPS.

We accept the officers' position that the appropriate process to consider such policy changes is through the review of the Canterbury Regional Policy Statement scheduled for 2022. No changes are recommended as a result of this submission.

Suggests that streamlined RMA processes be used to rezone the submitter's land.

**Hearing Panel discussion and recommendation:**

We accept officers' reasoning that such changes are better considered through subsequent Resource Management Act process.

No changes are recommended as a result of this submission.

**Brendon Harre (070)**

New development in Waimakariri and Selwyn should be integrated with new rapid transport services.

**Hearing Panel discussion and recommendation:**

Mr Brendon Harre presented his submission to us at the hearing. He discussed the need to integrate housing with rapid transport and the lack of public transport placing reliance on private motor vehicles which affects peak time transport and subsequent productivity. If Greater Christchurch could reduce its car ownership, this would reduce congestion. Congestion charging and road pricing could be incorporated, but in order to do so, rapid transit is needed, and this links into density. He provided examples of development at Hobsonville of up to 100 households per hectare. He considered that with densities lower than 20 households per hectare, it would be difficult to provide rapid transit at a good cost. Mr Harre also showed how rent in the residential market had increased 41% over three and a half years, which placed a burden on households. Building a rapid transport network would help Christchurch out of the choice of congestion versus affordable housing, encouraging the city build upwards, rather than outwards, improving city liveability. Greater Christchurch would need to co-ordinate with central government to deliver such a project.

In response to Mr Harre's submission, officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*).

That notes that investment in rapid transport north and south-west of Christchurch City, and other service enhancements across the network, can support land uses change and encourage higher density development along such corridors. Officers said it is critical for achieving effective land use and transport integration that land use policies do align with transport investments. Planning and investment decisions,

<sup>11</sup> Page 8 National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas, published July 2018

including identifying the most appropriate public transport mode, are the subject of further detailed work underway as part of business case processes. The officers' informed us that this ongoing work will help to determine what changes may be required through spatial and district planning to support the vision for a fully integrated transport system and urban form in Greater Christchurch.

The Regional Land Transport Plan and Regional Public Transport Plan highlight the potential for emerging technology and transport services to alter and enhance transport patterns, mobility and accessibility across Greater Christchurch. This will require ongoing monitoring and review but at this stage it is considered supplementary to the need to provide mass transit options across Greater Christchurch.

Our Space identifies how future transport plans can drive and support the proposed future settlement pattern but relies on these separate transport plans, required under the LTMA.

No changes are recommended as a result of this submission.

Use Urban Development Authority powers to achieve a mix of housing.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing and a range of housing types*).

We note that the Authority, while it has been announced, does not yet exist. That will require legislative change.

No changes are recommended as a result of this submission point.

Queries decline in growth from 2023 for all growth scenarios (page 9).

**Hearing Panel discussion and recommendation:**

Officers noted that the reason for this is that Statistics NZ is projecting that the recent historically high migration rates will reduce back to more average levels and the birth rate will drop.

We accept the recommendations of the officers and no changes are recommended as a result of this submission point.

Densification requires rapid transport with delivery in the short to medium term.

**Hearing Panel discussion and recommendation:**

As we note above, transport matters are subject to other processes, including the Greater Christchurch Future Public Transport Business Case.

We accept the recommendations of the officers and no changes are recommended as a result of this submission point.

End current dependence on the automobile.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*) and 5 (*Transport needs and implications, including public transport*).

The submission point is noted, but no changes are recommended as a result of the submission point.

**Allan Downs Ltd (071)**

Landowner supports inclusion of greenfield priority land (inside the PIB) on Johns Road, Rangiora.

**Hearing Panel discussion and recommendation:**

Support noted. No changes are required as a result of this submission point.

Greenfield priority area should be rezoned ahead of identified future urban areas.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. They note that Our Space identifies sufficient, feasible development capacity to meet demand but consider that district plan processes are best placed to consider appropriate sequencing and zoning of land for urban use (if enabled to do so through a change to the Canterbury Regional Policy Statement). This is in part because detailed structure planning has yet to be fully completed or reviewed by territorial authorities in a collaborative manner with relevant landowners, developers and communities for future development areas. In addition to this, we note that Greenfield Priority Areas are those that were introduced as part of the Land Use Recovery Plan. This is the reason for differentiating them from future development areas, as set out in the officers' response to questions from the Hearings Panel (question 1).

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

### **Kevin and Bonnie Williams (072)**

Seek to develop land on Marshs Road, Prebbleton for rural residential use.

#### **Hearing Panel discussion and recommendation:**

Ms Aston appeared on behalf of and Mr Kevin Williams and Ms Kelly Williams, seeking to develop their land for rural-residential purposes, or potentially industrial land use.<sup>12</sup> The site is approximately 55 hectares, after land was acquired for the Christchurch Southern Motorway, on the boundary of Christchurch and Selwyn districts.

She considered the site was well serviced and is close to Christchurch, with services to the boundary. Ms Aston noted that it is the buffer between Christchurch City and Prebbleton, but that the site is proposed for development of a low-density nature.

In relation to rural residential land, the Canterbury Regional Policy Statement sets out a framework for consideration of these areas, and requires them to be included in a rural residential strategy in the case of Waimakariri or Selwyn District, or in the case of Christchurch City, no provision is made for further new rural residential land.

No changes are recommended in relation to this submission.

Development capacity targets are uncertain and likely to be inaccurate and based on flawed methodology and do not consider rural residential development.

#### **Hearing Panel discussion and recommendation:**

We accept the officers' position that the capacity assessment are sound and fit for purpose. We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, which considered that the housing demand assessment undertaken by Greater Christchurch to be an example of 'best practice'.<sup>13</sup> The report recognises that more could be done regarding setting out assumptions around feasible development, but throughout the document, this appears as a recommendation for future capacity assessment reports. We are satisfied that the housing capacity assessment is fit for purpose, and that continual refinement will address future capacity and feasibility as markets change and more information is gathered.

No changes are recommended as a result of this submission.

### **Rolleston Industrial Holdings Limited (073)**

Industrial development capacity does not accurately account for the space intensive and low employee occupancy nature of activities at I-Zone and I-Port.

#### **Hearing Panel discussion and recommendation:**

<sup>12</sup> Mr Kevin Williams and Ms Kelly Williams (#72)

<sup>13</sup> Page 8 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

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Rolleston Industrial Holdings opened iPort and own a further 25 hectares of land that has a railway siding. They seek that this land be included as a Future Development Area, should it be required.

We received evidence from Mr Phillips (planner) and Mr Copeland (economist), and received legal submissions from Ms Semple and further oral submissions from Mr Carter (Company Director) regarding the Rolleston Industrial land, in particular regarding freight movements and the availability of land related to iPort, which incorporates the Midland Port owned by the Lyttelton Port Company. The key criticism of the industrial land capacity assessment was that it did not properly take into account freight modes, and this was also identified as an issue for the Cockburn Trust land. Mr Carter offered that in his opinion, there would be serious land supply issues in the next 2-3 years, and that it was important to have additional land available that has a railway siding, to ensure that businesses wishing to use rail for freight could be efficiently supported.

We are reassured by the assessment outlined in the Ministry for the Environment's report, which we requested from officers and was provided to us, which considered that the business land capacity and feasibility work done by Greater Christchurch to be an example of 'best practice'.<sup>14</sup> The officers' position was that the Business Capacity Assessment methodology does take account of the different industrial sectors and applies different employee to floorspace / land area ratios. It looks not just at site specific landholdings but the wider industrial market. This includes land in southwest Christchurch (Hornby and Islington) where there are also significant areas of industrially zoned land. Officers consider that no further provision for industrial land is considered necessary at this time, and noted that the Greater Christchurch Partnership will continue to monitor take up and market indicators and will review the capacity assessments on a three-yearly basis so as to be responsive to market needs.

We have considered the submissions and in particular the evidence of Mssrs Copeland and Phillips, and the position of officers. We didn't receive any evidence regarding the makeup of business located next to rail sidings or with access to the rail network, nor whether specific land was being set aside for those businesses that require rail transport modes. We do think that a better understanding is required for the demand for this type of development with access to the rail network, and the potential impact that releasing more industrial land will have on the viability of existing centres. As such, we signal that it is appropriate that the Greater Christchurch Partnership look to refine its methodology for industrial business land by considering, as part of future capacity assessments, the impact of modal shift (from road to rail) on demand. We consider that this is also an important aspect of fulfilling the objectives under the Canterbury Regional Policy Statement for integrating land use and infrastructure.

We note that the land has specific infrastructure requirements associated with the rail network. We also note that an over-supply of specific types of industrial land should not be compared in the same way as an oversupply of residentially zoned land, which has the potential to impact on residential intensification objectives and targets in the central city and key activity centres, although they may have an impact on maintaining a compact urban form. We have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

We accept in part the submitter's request, to the extent of our recommendations for Environment Canterbury to engage with the landowner and for the local authorities to consider the relationship of transport modes to demand in specific locations as part of future capacity assessments.

### **Christchurch City Council (074)**

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<sup>14</sup> Page 18 *National Policy Statement of Urban Development Capacity – Summary evaluation report of Housing and Business Development Capacity Assessments for high-growth urban areas*, published July 2018

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Inconsistencies in Our Space.

**Hearing Panel discussion and recommendation:**

Officers provided a response in relation to inconsistencies in Our Space in the officers' report, along with an analysis of those matters in Appendix F to the report.

They noted that Table 3 of *Our Space* reports a surplus of housing development capacity in Selwyn District over the medium term of 1,125. The associated text (page 13) and table footnotes in *Our Space*, as well as the evidence base documented in the Capacity Assessment highlight that feasibility tests produced a wide range of results and that further work to improve the modelling tools was underway. Given such uncertainty with regard to the feasibility of development capacity (and the implications for sufficiency in the medium and long term) *Our Space* refers to a 'potential shortfall in capacity' in relation to this matter.

They told us how updated feasibility analyses for Selwyn and Waimakariri Districts completed prior to the *Our Space* consultation period but too late to be incorporated into the *Our Space* document, were included as part of the supporting consultation material. This was therefore available to submitters and reinforced the work required to refine feasibility and sufficiency conclusions as part of a final *Our Space* document.

Christchurch City Council did not appear in relation to its submission

Officers recommended updating the Actions in *Our Space* to work on an improved methodology for capacity and making amendments to the wording of Section 3.2. We accept the reasons and recommendations of the officers.

. We understand that density in new urban area in the Selwyn and Waimakariri districts remains an issues.

Updating proposed policy interventions to reflect emerging data.

**Hearing Panel discussion and recommendation:**

Officers referred to their comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected future demand*) in the officers' report.

They said that throughout *Our Space* the need for ongoing monitoring and review of the evidence base to support decision making is clearly stated. This is a requirement of the NPS-UDC as part of monitoring of market indicators and the preparation of a capacity assessment at least every three years (with subsequent consideration to review housing targets and the future development strategy where necessary).

We accept the officers' position on this matter, noting that policy interventions are available to reflect emerging data. In particular, for the short to medium term these can be addressed in the review of the Canterbury Regional Policy Statement in 2022.

No changes are recommended as a result of this submission point.

Sequencing of development.

**Hearing Panel discussion and recommendation:**

Officers referred to the recommendations outlined in Section 4 in relation to Theme 5 (*Sequencing and staging of greenfield land*) in the officers' report. In addition, the evaluation in Appendix F of the officers' report is also relevant. In relation to this they recommend that sequencing is identified as part of structure planning processes and infrastructure servicing, which is best determined by the relevant territorial authorities. They noted that such processes would need to have regard to existing Canterbury Regional Policy Statement provisions, and recommended wording amendments to clarify this.

We accept the officers' reasons and recommendations on these matters, and accept the submission in part

to the extent that the changes outlined in theme 5 of the officers' report are made clarifying that sequencing will be addressed in the manner described.

Intensification in townships and increase densities in greenfield areas and future development areas.

**Hearing Panel discussion and recommendation:**

Christchurch City Council seeks a minimum net density of 15 households per hectare, while the remaining Councils are satisfied that 12 households per hectare is appropriate. The Chief Executives of the Greater Christchurch local authorities presented to us in relation to achieving 12 households per hectare as part of the district plan review processes.

The Hearing Panel heard oral evidence regarding densities from developers and planners undertaking work within Rolleston and Waimakariri, as well as evidence from individuals seeking higher densities in the settlement areas outside of Christchurch. Generally, the position was that 12 households per hectare is appropriate in those areas. This is higher than the current requirement of 10 households per hectare in the Canterbury Regional Policy Statement.

Having considered the Christchurch City Council's submission and the officers' position, we accept the officers' position in part. In terms of timing, we do not agree with officers that a review of density takes place as part of the 2019 change to the Canterbury Regional Policy Statement. We consider that this a matter for the review of the Canterbury Regional Policy Statement in 2022, as it has the potential to stall the change process planned for 2019, which is urgently required. In addition, we consider that Our Space contains a strong direction that 12 households is to be achieved in the interim. We are satisfied on the evidence we received that this is both achievable and appropriate.

Factoring in rural capacity.

**Hearing Panel discussion and recommendation:**

Officers recommended in Appendix F of the officers' report that Table 3 in Section 3.2 be updated in relation to this submission point to recognise rural capacity, and made recommendations to include this in future updates for capacity assessments, noting factors that create uncertainty around the assessment.

We accept the officers' position and therefore accept the submission, and recommend changes in accordance with officers' recommendations.

Reviewing business sufficiency.

**Hearing Panel discussion and recommendation:**

Officers told us that modelling of business demand was undertaken for the Capacity Assessment using the projected household demand in Table 1 of Our Space. With the development of Our Space, in particular the proposed housing targets in Table 2, there was insufficient time to remodel the implications of such an alternative apportionment of demand by each territorial area.

Population growth generally and in different locations will have an impact on the economy, the growth of the workforce and demand for business land or floorspace. Remodelling of business demand using the housing targets in Table 2 Our Space was completed and Table 4 amended to reflect this more accurate assessment of business sufficiency.

We accept the officers' reasoning and update Table 4 accordingly.

Addressing social and affordable housing.

**Hearing Panel discussion and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing*)

Officers noted that Figure 13 (page 20) of *Our Space* outlines the workstreams anticipated to comprise an action plan to enable social and affordable housing provision across Greater Christchurch, and Action 2 in the schedule of further work in *Our Space* section 6.2 specifically identifies this initiative for completion during 2019-2020.

They said that the more specific mechanisms proposed in the CCC submission primarily relate to RMA land use provisions that can be addressed through respective district plan reviews (including the related submission points on appropriate densities in Selwyn and Waimakariri and the officer response outlined in this Officers Report). Section 5.3 and Action 9 in section 6.2 of Our Space also reference the investigation of redevelopment and intensification opportunities in existing urban areas and close to town centres (which would presumably encourage smaller lot sizes and multi-unit dwellings).

We accept the officers' position on this submission for the reasons set out above and no changes are recommended as a result of this submission point.

No changes to Our Space are recommended as a result of this submission point.

### **Ministry of Education (075)**

Overall support for the proposed strategy, and the inclusion and consideration of social infrastructure.

#### **Hearing Panel discussion and recommendation:**

The submission point is noted.

No changes are recommended as a result of this submission point.

Encourages councils to undertake early engagement with the Ministry when implementing development areas.

#### **Hearing Panel discussion and recommendation:**

The submission point is noted.

No changes are recommended as a result of this submission point.

Support for the concept of a '10-minute neighbourhood' but notes there is limited commentary in Our Space.

#### **Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

We accept the officers recommendation with the recommended clarification.

Encourages exploring opportunities for the Ministry and councils to share recreational and community facilities.

#### **Hearing Panel discussion and recommendation:**

The submission point is noted.

No changes are recommended as a result of this submission point.

### **Carter Group Limited (076)**

Landowner seeks inclusion of additional land (outside the PIB) in Kainga.

#### **Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report. The officers' position is that no new industrial areas are proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, that the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of the Canterbury

Regional Policy Statement scheduled for 2022. This review is identified in Section 6.2 in the schedule of future work.

We accept the officers' position on this. However, we have recommended amendments to Section 6.2 to ensure that Environment Canterbury engage with this landowner prior to the notification of the review of Chapter 6 of the Canterbury Regional Policy Statement, in relation to the appropriateness of the inclusion of this land within Map A of Chapter 6 and in light of the next Capacity Assessment.

### **ChristchurchNZ and Development Christchurch Limited (077)**

Proposed settlement pattern approach in Our Space driven by growth forecasts rather than an active approach that considers how urban areas should be developed to meet broader strategic aspirations.

#### **Hearing Panel discussion and recommendation:**

We heard from Mr Nick Bryan and Mr Steve Clarke for ChchNZ and Development Christchurch. In preparing the Strategy, Mr Clarke would have liked to have seen explicit analysis of the strategic priorities for Greater Christchurch and how these shape the settlement patterns to best deliver these. He considered the starting point should be an articulation of the preferred outcomes, then an analysis of how spatial distribution of activities can best support these. Instead, the proposal provides for a passive approach, responding to demographic forecasts. The organisations would prefer an approach that responds to outcomes.

Officers said that the principal aim of Our Space is to ensure that there is sufficient housing and business development capacity in Greater Christchurch to support future demand, and that this demand is supported in a way that aligns with the vision, principles and strategic goals of the Urban Development Strategy.

The main source of demand for housing and business space relates to population growth. To understand the scale and type of demand that is likely in the future, Policy PB2 of the NPS-UDC states that local authorities shall use information on demand when preparing their capacity assessment, including likely demographic changes using Statistics NZ population projections.

They noted to accommodate these projected demands in a way that aligns with broader strategic aspirations for Greater Christchurch, Our Space was guided by the strategic directions of the Urban Development Strategy. This is set out in Section 2.3 of Our Space. The long term settlement pattern approach outlined in Our Space reflects the previously agreed urban limits of the Urban Development Strategy and the Canterbury Regional Policy Statement.

Adopting a transitional approach to housing targets in Our Space also demonstrates a clear strategic consideration of how future demand should be accommodated in Greater Christchurch, diverging from the adopted growth projections. This approach directs more demand to be supported through redevelopment in the City over the long term.

Taking into account the explanation from officers, we consider that the approach taken is correct, and aligns with both the requirements NPS-UDC and the vision, principles and strategic goals of the Urban Development Strategy.

We accept the position of officers and as a result, we do not recommend any change in response to this submission point.

Cities' prosperity is vulnerable unless the mix of economic activity shifts away from reliance on the rebuild and servicing the local population, which requires the aspiration to create new and better economic prospects.

#### **Hearing Panel discussion and recommendation:**

Officers noted that Our Space does not determine the types of economic activities to be undertaken across Greater Christchurch, but seeks to ensure there is sufficient commercial and industrial space available to support business needs over the long term. The Capacity Assessment indicated this capacity is well planned for with the Central City recognised as the core commercial hub for the Greater Christchurch area.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Insufficient attention is given to the importance of driving urban growth to the central city and inner suburbs in the short to medium term, to position Greater Christchurch as an attractive proposition in the long term.

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, Our Space identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the adopted projections.

They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We note the principle behind the submission, and to that extent we accept it. No changes are proposed to Our Space as a result of the submission.

Concern regarding the information and assumptions used in the preparation of Our Space, specifically in terms of the post-earthquake effects on population and employment forecasts.

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). They note that the projections are only the starting point for spatial planning. For instance, they said, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances.

We accept that there is uncertainty in the projections. The ongoing capacity analysis cycle (undertaking capacity assessments every three years) provides for monitoring of uptake and development, and the ability to adjust capacity assessments and improve the capacity assessment methodology to ensure demand and uptake is understood. No changes are recommended in relation to this submission.

Specific comment on the Executive Summary, that wellbeing strategies should inform and drive settlement pattern strategies, not be made to fit and complement them.

**Hearing Panel discussion and recommendation:**

Officers noted the submission point.

No changes are recommended in relation to this submission.

Specific comment on Section 2.1 (page 3), that central city employment levels are well-below pre-earthquake levels and there is still a long way to go to create a vibrant 'principal commercial hub' for the region.

**Hearing Panel discussion and recommendation:**

Officers acknowledged that wording in Our Space related to Central City employment levels nearing those attained prior to the earthquakes may be misleading and should be amended.

We agree and recommend amending Section 2.1 of Our Space to clarify that employment levels in the Central City remain below pre-earthquake levels.

Specific comment on Section 4.1 (page 15), that a key issue that is missing is the need to ensure momentum in regeneration is maintained and accelerated to create a vibrant urban centre and higher economic relevance.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*). They note and support the submission point highlighting the importance of the Central City and that it should be a focus for development. However, the challenges outlined in Section 4.1 relate to an assessment across Greater Christchurch and have not identified where in particular such issues are most important.

For the reasons set out, no change is recommended.

**Lincoln University (078)**

Need to provide sufficient buffer between research farms and urban development.

**Hearing Panel discussion and recommendation:**

Officers noted the submission point.

No changes are recommended in relation to this submission point.

Maintain PIB in current proposed position for Rolleston and Lincoln.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*).

Our Space does not propose any changes to the Projected Infrastructure Boundary.

No changes are recommended in relation to this submission point.

**KiwiRail Holdings Limited (079)**

Support for UDS principles and strategic goals guiding Our Space, and reference to the GPS on Land Transport.

**Hearing Panel discussion and recommendation:**

We heard from Ms Rebecca Beals and Ms Jeanine Benson in relation to the submission from KiwiRail Holdings Limited.

In relation to this submission point, support is noted, and no changes are recommended.

Industry and tourism growth is anticipated to result in some increased demand on the rail network.

**Hearing Panel discussion and recommendation:**

Comment is noted, no changes are recommended.

Relevant business areas should be appropriately protected and developed, along with links to the transport network, to ensure existing rail functions and future opportunities to use rail are not compromised.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure and integration with development*) in the officers' report.

The rail network is strategic infrastructure for Greater Christchurch that requires protection from inappropriately located development, thereby ensuring safety and efficiency are not compromised, or

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reverse sensitivities created. The submitter notes that KiwiRail already works closely with councils to ensure such issues are recognised and addressed through district plans, which is the appropriate planning mechanism to address such matters.

We consider that that protection is adequately recognised and provided for in the Canterbury Regional Policy Statement. No changes are recommended in relation to this submission point.

Need to ensure any new development does not generate reverse sensitivities for the rail network.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 10 (*Provision and protection of key infrastructure and integration with development*) in the officers' report.

The rail network is strategic infrastructure for Greater Christchurch that requires protection from inappropriately located development, thereby ensuring safety and efficiency are not compromised, or reverse sensitivities created. The submitter notes that KiwiRail already works closely with councils to ensure such issues are recognised and addressed through district plans, which is the appropriate planning mechanism to address such matters.

We consider that that protection is adequately recognised and provided for in the Canterbury Regional Policy Statement. No changes are recommended in relation to this submission point.

Will work with the Partnership where possible to assist in achieving the vision for the transport network.

**Hearing Panel discussion and recommendation:**

Comment is noted, no changes are recommended.

Seeking clarification around what is intended in terms of improvements to the transport network, and that KiwiRail is party to any discussions that have implications for the rail corridor.

**Hearing Panel discussion and recommendation:**

These matters will be further explored as part of transport business cases.

No changes are recommended in relation to this submission point.

Include a reference in Section 5.6 of Our Space that future growth may require changes to the rail network.

**Hearing Panel discussion and recommendation:**

These matters will be further explored as part of transport business cases. Changes are recommended to section 5.6 to provide further detail about transport business cases.

Expand the last paragraph in Section 5.7 of Our Space (beginning "*Further more detailed assessment...*") to include consideration of how future growth areas will integrate with land transport.

**Hearing Panel discussion and recommendation:**

These matters will be further explored as part of transport business cases.

No changes are recommended in relation to this submission point.

**Robert Fleming (080)**

Considers that Christchurch City should be developed prior to additional greenfield space outside the city boundaries (cost, efficient infrastructure provision, diminishing quality and quality of productive land).

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. They said that *Our Space* seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported

through redevelopment in the City over the long term than would be anticipated based on the adopted projections.

They considered this holistic approach to targets seek to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We accept the officers' reasons and recommendations on this, and do not recommend any changes as a result of this submission point.

Supports active and public transport options, better transport options within the city, shared transport options, and rapid transit between regional Canterbury towns combined with workable park and ride solutions.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*) in the officers' report.

The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.

No changes are recommended in response to this submission point.

Better transport options to industrial areas should be provided for.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*) in the officers' report.

The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.

No changes are recommended in response to this submission point.

**Malc Dartnall (081)**

Highlights a lack of larger houses.

**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendations outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing and a range of housing types*).

Officers said that the evidence underpinning Our Space highlights how changing demographics and affordability will likely impact the range of housing types demanded, increasing the need for smaller and multi-unit dwellings to complement the existing housing stock dominated by larger standalone houses. The number of larger families, as a proportion of overall household growth, is predicted to decline. Our Space seeks to provide for the range of housing types likely to be needed to accommodate future population growth – it does not preclude the development of larger houses. Our Space will need to monitor and review the anticipated scale and pace of changes to housing demand as part of subsequent capacity assessments.

We accept the officers' reasons and recommendations and do not recommend any changes as a result of this submission point.

Concerned that the current planning framework encourages small houses and disregards the needs of larger families; considers that Our Space should be family friendly with the needs of larger families specifically mentioned.

**Hearing Panel discussion and recommendation:**

We refer to the evaluation in relation to the above submission point and do not recommend any changes as a result of the submission.

Considers there is a lack of industrial zoned land in Waimakariri.

Officers note that the Capacity Assessment identified a significant oversupply of industrial land in Greater Christchurch to meet long term demand. Section 3.3 (p. 14) of Our Space outlines these findings.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

**Helen Broughton (082)**

Concerned that this process is occurring so soon after the same issues were considered through the Christchurch District Plan Review.

**Hearing Panel discussion and recommendation:**

We note that the development of Our Space, being a future development strategy, is a requirement under the NPS UDC and is mandatory.

No changes are recommended in response to this submission point.

Suggests that both low and medium growth projections should be used.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*).

Our Space adopts population projections that reflect recent growth trends in Greater Christchurch, with the rationale for the adopted projections fully documented in the Capacity Assessment. The projection scenario used for the purposes of Our Space anticipates a Greater Christchurch population of 640,000 in 2048, which is higher than Statistics NZ's medium (or most likely) projections by 22,000, but much lower than Statistics NZ's high projections that anticipates a population of 742,000 in 2048. The projection scenarios considered in developing Our Space are shown in Figure 7 (p. 9).

It is of note that in developing the Urban Development Strategy in 2007, the Greater Christchurch population was expected to be in the region of 550,000 in 2041. In comparison, the projections used for Our Space anticipates this population closer to 2031, some ten years sooner than was anticipated by the 2007 UDS.

In July 2018, MfE and MBIE published a report that evaluated capacity assessments undertaken for the high growth urban areas. This report stated that most high growth urban areas used an alternative to Statistics NZ's medium projections, and in general, the choice to use a different projection could be clearly explained and justified with recent trends. The report considered the demand assessment for Greater Christchurch to be best practice amongst high growth urban areas.

No changes are recommended in response to this submission point.

Questions whether the decrease in home ownership in Christchurch identified on page 11 is realistic.

**Hearing Panel discussion and recommendation:**

Officers advise that the projected decrease in home ownership rates reported on page 11 was one of the findings of a comprehensive assessment of the future housing demand profile for Greater Christchurch commissioned as part of the Capacity Assessment (Livingston Associates, Housing Demand in Greater

Christchurch). This refers to the proportion of the additional households projected in Christchurch City over the period to 2048 whose housing needs are likely to be met by the rental market.

No changes are recommended in response to this submission point.

Suggests that given there is sufficient housing in Christchurch City major urban planning changes for Christchurch need not occur.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*).

No changes are recommended in response to this submission point.

Identifies negative effects of intensification. Comments that intensification should be directed to the central city, with no further intensification in suburban Christchurch beyond what is currently permitted; if intensification is further considered any area the [Christchurch District Plan Review] Hearings Panel judged to be inappropriate for medium density should retain suburban density. If medium density is to be continued it should have allowance for parking and more courtyard space and plantings.

**Hearing Panel discussion and recommendation:**

In response to questions from the Panel, Ms Broughton said that in Ilam, some accommodation was needed for students, but that students do have cars and can travel. Ms Broughton considered that the current zonings were enough. She thought there would need to be an attitude change to transport, and that would only happen if the price of petrol went up. She would prefer to see greenfield land opened up, or intensification in the city, before additional intensification took place in the suburbs.

Officers refer to comments and recommendations outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing and a range of housing types*).

We note that the Independent Hearings Panel left future decisions regarding further upzoning to the Christchurch City Council.

No changes are recommended in response to this submission point.

Considers there is sufficient land in Christchurch City for the long term with low to medium growth and no need to focus on further medium density areas.

**Hearing Panel discussion and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). Officers noted that Statistics NZ population projections remain the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept the officers' position and no changes are recommended in response to this submission point.

Questions the accuracy of the infographic in Section 3.2 of Our Space (p 11) with regard to the affordability constraints of new households.

**Hearing Panel discussion and recommendation:**

Officers addressed this matter in their Reply Report. They considered that on investigation, the wording in the infographic should more accurately read:

62% of new households housing in the City, 35% in Selwyn and 58% in Waimakariri.

Officers stated that this information is derived from the expert analysis of Livingston Associates who prepared a Housing Demand Assessment as part of the Capacity Assessment. This work used Statistics NZ

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demographic data and extrapolated current trends in household size, income and other classifications through to 2048.

New households formed over the next 30 years are expected to experience increasing affordability pressures, even with a sufficient supply of new housing appropriate to the needs of a changing household composition. An important aspect of this infographic however is that it is the total housing stock available that would need to meet the financial thresholds identified (i.e. under \$350,000 to buy or \$200/week to rent) to be considered affordable.

We accept the officers' position and changes recommended.

### **Youth Voice Canterbury (083)**

Keen to identify how Our Space meets priorities identified in youth strategies, action plans and surveys and consider how the future settlement pattern proposed addresses the challenges over the next 30 years and the quality of life of future generations.

#### **Hearing Panel discussion and recommendation:**

Youth Voice Canterbury tabled information in relation to their submission, which included a number of closing recommendations. Officers considered that this information was best addressed by other processes. We note the issues of concern for Youth Voice, and identify the following processes where these matters may be followed up, or more appropriately addressed in relation to each recommendation:

1. Enforce warrant of fitness standards for houses to ensure that all homes built in the future are of high standards – *this is better addressed at a national level through legislative change and will be considered as part of rental tenancy reform.*
2. Ensure there is some form of community, low income housing to provide a space for the homeless especially those who are young – *this is addressed by housing agencies, but we note that it also is picked up in part by an action in Our Space (Action 2).*
3. Investment in more buses that travel around the suburbs/communities without going into the central city – *this is a matter for the Regional Public Transport Plan.*
4. Re-introduce the free shuttle around the central city – *this is a matter for the Regional Public Transport Plan.*
5. Reduction of the price of the trams for locals so they are affordable and able to be used as public transport – *this is a matter for the Regional Public Transport Plan.*
6. Invest in light rail from Kaiapoi/Rangiora to Rolleston, via east side/Marshland area and provide funding and support the introduction of innovative transport concepts like solar powered trains – *this is a matter for the Regional Public Transport Plan although we note that amendments have been made in Our Space around transport and funding and identification of rapid transit routes.*
7. More opportunity for cultures to express themselves through cultural events – *this is a matter that is appropriately directed to district council long term planning and annual planning processes.*
8. Increase knowledge of diversity through cultural hubs - *this is a matter that is appropriately directed to district council long term planning and annual planning processes.*
9. Use empty land and city council public areas to make youth friendly spaces - *this is a matter that is appropriately directed to district council long term planning and annual planning processes.*
10. Increase outdoor seating, street lighting, and shaded areas - *this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.*
11. Improve footpaths - *this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.*
12. Make the central city greener, create more and improve places and walks with native trees and fauna, and Increase community input into creating green spaces - *this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.*

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13. Ensure green spaces have natural and peaceful seating areas and adequate lighting - *this is a matter that is appropriately directed to district council long term planning and annual planning processes and engagement with community boards in particular locations.*

the and recommended amendments in relation to the affordable housing action plan and transport funding and identification of rapid transit routes. We accept the officers' position, and no changes are recommended in response to this submission point.

**Richard Graham (084)**

Considers that the plan should first consider what level of population growth (if any) there should be in Greater Christchurch and questions whether providing for housing and infrastructure for levels growth indicated by Statistics NZ projections is the best outcome for the region.

**Hearing Panel discussion and recommendation:**

Refer to the officers' comment and recommendation outlined in Section 4 in relation to Theme 1 (*Accuracy and uncertainties of projected demands*). Officers noted that Statistics NZ population projections remain the most robust information available to predict future population changes. The NPS-UDC requires a new capacity assessment every three years to ensure planning is responsive to any changing trends. Officers said that the approach to setting housing targets in Our Space, as outlined in Section 3.2 is also considered to represent a principles-based approach rather than following a purely projections-led approach.

Our Space also outlines that, with appropriate densities, demand can be met for future housing needs both within the Christchurch City area, and the wider Greater Christchurch area. As discussed below, the appropriate consideration of further areas should be considered as part of the review of the Canterbury Regional Policy Statement in 2022.

We accept officers' position and no changes are recommended in response to this submission point.

No assessment of the impact of further urban expansion on existing rural amenity or on holiday destinations.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl, developing in the City (and Central City) first ahead of surrounding districts*).

The comment related to impacts on holiday destinations is noted, but is beyond the scope of matters considered in Our Space.

We accept officers' position and no changes are recommended in response to this submission point.

Comments that all new developments should be encouraged to provide a range of housing typologies that provide for a range of family sizes and requirements.

**Hearing Panel discussion and recommendation:**

Officers noted that Our Space supports the delivery of a range of housing types, sizes and tenures that will be required to meet future demand, including by responding to projected changes in housing need and demand over the next thirty years. District planning plays an important role in the delivery of a broad range of housing types.

We accept officers' position and no changes are recommended in response to this submission point.

Comments that new commercial development should be contained within existing commercial hubs where possible, particularly encouraging greater activity within the CBD.

**Hearing Panel discussion and recommendation:**

Officers referred to comment and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*). This acknowledges that the explanation of, and policy intent behind, Key Activity Centres is limited in Our Space, and officers recommend the connection with the 10-minute neighbourhood concept should be clarified in Our Space through additional wording in Section 5.

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We accept the officers' recommendation on this, with the recommended clarification.

**Pomeroy's round table (085)**

*Submission withdrawn*

**Kieran Williamson (086)**

Considers that greenfield development in exurban areas such as Rolleston, Rangiora and Kaiapoi is unsustainable (increased CO2 and PM pollution, congestion and obesity).

**Hearing Panel discussion and recommendation:**

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on the projections. They considered this holistic approach to targets seeks to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We accept the position of the officers and no changes are proposed to Our Space as a result of the submission.

Proposes that all future development should be restricted to the current Christchurch City limits and a large majority of new development should be multi-unit dwellings (close to shopping, work and public transport) with single family detached dwellings discouraged.

**Hearing Panel discussion and recommendation:**

We refer to the above evaluation, in respect of Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. For the reasons referred to above, we do not recommend any changes to Our Space as a result of the submission.

Our Space pays only lip service to reducing greenhouse gas emissions.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 11 (*Addressing climate change and achieving sustainability and zero carbon goals*). We generally accept the officers' position on those matters, however we recommend changes with regard to addressing climate change, achieving sustainability and zero carbon goals. We consider this merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

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Large format retail serviced only by road corridors and suburban shopping mall developments should not be allowed to develop in new areas or expand in existing commercial areas.

**Hearing Panel discussion and recommendation:**

Officers referred to their comments and recommendation outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of a '10-minute neighbourhood'*) in the officers' report, and the reporting officers' reply report (question 9) with respect to the 10-minute neighbourhood concept. They said that Our Space reflects the current Canterbury Regional Policy Statement direction that the Central City and Key Activity Centres are the focus for commercial activity (office and retail), not just shopping malls, but also other public and community facilities such as education, health and leisure services. These centres integrate high quality public realm spaces and are well-connected by public transport services and safe cycle networks. Medium density housing in and around such centres support their vitality and viability.

We further note provision for neighbourhood centres in each of the district plans in Greater Christchurch, which are smaller centres providing for smaller scale commercial activities. These are also an important factor when considering 10-minute neighbourhoods.

We accept the officers' recommendations on this, and do not recommend any changes as a result of this submission point.

Small scale retail and office development should be allowed in areas without sufficient existing amenities within walking distance.

**Hearing Panel discussion and recommendation:**

We refer to the evaluation above, namely that Our Space reflects the current policy direction in the Canterbury Regional Policy Statement, in regards to Central City and Key Activity Centres which integrate high quality public realm spaces and are well connected to public transport services and safe cycle network.

We do not recommend any changes in response to this submission point and accept the officers' recommendations outlined in Section 4 in relation to Theme 8 (*Focusing commercial activity in key centres and the nature of the '10-minute neighbourhood'*).

Suggests that the best way to retain and increase the viability and vitality of existing commercial centres is to increase the density of housing within the catchment areas of these centres; replace existing old stock single family occupancy homes with multi-unit dwellings and develop greenfield and other underutilised spaces within existing city limits.

**Hearing Panel discussion and recommendation:**

Officers noted that Our Space promotes greater densities around key centres. District Plan provisions also play a key role in this regard. The Christchurch District Plan is enabling of residential intensification within and surrounding existing centres. The recent Christchurch District Plan Review up-zoned many areas around Key Activity Centres to facilitate medium density residential development and considerable potential also exists within the central city to support the CBD economy.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Considers priority should be given increasing / ensuring public transport access to industrial areas.

**Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*) in the officers' report.

The NZTA and local authorities in Greater Christchurch are working towards making more efficient use of the transport network. The importance of taking a multi modal approach to managing the network, which includes active transport such as walking and cycling and public transport for those who are less mobile or unable to cycle, is recognised.

Officers have recommended changes to include more detail on the transport business cases underway.

We agree with these recommendations. No further changes are recommended in response to this submission point.

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Supports higher densities within the current city limits.

**Hearing Panel discussion and recommendation:**

This submission is noted, and no changes are recommended as a result of this submission point.

**Axel Wilke (087)**

Supports the sentiments expressed in Our Space.

**Hearing Panel discussion and recommendation:**

Support noted. No change is recommended as a result of this submission point.

Does not consider the targets set in Our Space are ambitious enough to prevent further climate change; much of the development will only be supportable by auto-centric lifestyles; objective should be to define high-capacity public transport corridors with high density alongside; greenfield developments should only be permissible with good public transport provision from day one.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendation outlined in Section 4 in relation to Theme 5 (*Transport needs and implications, including public transport*). We consider the response with regard to addressing climate change, achieving sustainability and zero carbon goals merits its own new section under Section 4 in Our Space, elevated to a higher priority, and amendments to Section 5 of the report, with tighter, clearer and more aspirational wording. As a result, we accept the submission in part to the extent that changes to those sections are made.

**Colin Eaton (088)**

Considers that Christchurch does not have the infrastructure to support more growth – identifies concerns relating to drainage, stormwater, sewerage and market garden land and orchards.

**Hearing Panel discussion and recommendation:**

Infrastructure is planned out for a period of 30 years under the infrastructure strategies prepared under the Local Government Act 2002. Matters such as market gardens and orchards can be address through treatment of land and sampling under the relevant National Environmental Standards.

No changes are recommended in response to this submission point.

Comments that social housing does not mix well.

**Hearing Panel discussion and recommendation:**

Noted. No changes are recommended in response to this submission point.

Suggests that all vacant industrial land and buildings should be revitalised before planning for more industrial areas.

**Hearing Panel discussion and recommendation:**

No new industrial areas are planned given the existing significant supply of industrially zoned land in Greater Christchurch. No changes are recommended in response to this submission point.

Considers that the plan should show we care for the future and city environment not driven by the economy and greed.

**Hearing Panel discussion and recommendation:**

Noted. No changes are recommended in response to this submission point.

Comments that the transport network will only work if it is good and regular and private cars are banned from the central city.

**Hearing Panel discussion and recommendation:**

The suggestion to ban cars from the city centre is out of scope of the matters considered in Our Space. No changes are recommended in response to this submission point.

**Chris Morahan (089)**

Considers that resolving distortions in the housing market created by the transport system and removing planning rules that restrict dense development will lead to higher demand in the inner city and along public transport corridors, and lower demand in outlying auto-centric suburbs like Rolleston and Rangiora, in the future.

**Hearing Panel discussion and recommendation:**

Noted. No changes are recommended in response to this submission point.

Agrees with intensifying the inner city and public transport corridors; disagrees within more auto-centric sprawl.

**Hearing Panel discussion and recommendation:**

Mr Chris Morahan presented his submission. Mr Morahan is a transport planner and blogger. Mr Morahan described how the decisions being made now would make a big impact on his daughter and her peers, than it would on the current people in the room. He referred to the Intergovernmental Panel on Climate Change and its recent reported on the current state of climate change, and its conclusions. He noted that even without climate change, modal shift provides for public health benefits and safety. He noted that the draft public transport plan was released, and the general theme of submissions was that public transport needed to go further, and it should address passenger rail. He referred to a recent Colmar Brunton survey that noted more than 50% of people are concerned about climate change and the need to act. In relation to development, Mr Morahan observed that higher density is needed, pedestrian connections are required, with well-planned corridors, and areas are contiguous. He said that people will use rail corridors if rail is provided. He considered it was likely there will be a zero carbon act, with better carbon prices, and a need for better walking and cycling. His three takeaway points would be a need for more ambitious intensification around existing corridors, no more greenfields sprawl, and not to preclude existing rail corridors. He considered while the text of Our Space was good, it didn't line up with percentages of greenfield development that are proposed and he did not think it would deliver a dense compact city.

Officers referred to the comments and recommendations outlined in Section 4 in relation to Theme 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) in the officers' report. They said that Our Space seeks to provide a balanced approach that both provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing, and adopts an approach to housing targets that allows for a greater share of new households to be supported through redevelopment in the City over the long term than would be anticipated based on projections.

They considered this holistic approach to targets seeks to respond to projected changes over the long term and is different to constraining growth in the districts over the medium term to benefit development prospects and outcomes in the City, especially the Central City, as suggested by some submitters.

Officers said that an approach to limit intensification to the Central City alone would be counter to these existing Christchurch District Plan provisions, would likely only deliver a segment of the housing types envisaged by intensification policies (i.e. higher density townhouses and apartments), and would be highly unlikely to provide the level of new housing required to meet projected demand.

They noted that Christchurch City Council has embarked on an ambitious programme to encourage Central City living, titled Project 8011, with a target of increasing the Central City population to 20,000 by 2028 from a current level of around 6,000. Project 8011 signals that over time the initiatives and mechanisms that comprise the programme can be rolled out more broadly, where appropriate, to encourage and support city-wide intensification.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

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Considers the plan should seek to allow commercial development everywhere it can and let businesses gravitate to the best location for them.

**Hearing Panel discussion and recommendation:**

Officers noted that Our Space has been prepared in accordance with the existing principles of the Urban Development Strategy and policy framework of the Canterbury Regional Policy Statement. Both documents reinforce the centres-based approach. Any change in policy direction regarding the centres-based approach is more appropriately considered as part of the 2022 review of the Canterbury Regional Policy Statement.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Strongly agrees with promoting higher densities around key centres. Suggests that railway lines could be included as key future public transport routes.

**Hearing Panel discussion and recommendation:**

We understand that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case. No changes are recommended in response to this submission point.

**Wayne Phillips (090)**

Large greenfields development in Rangiora and Rolleston will lock in auto dependence.

**Hearing Panel discussion and recommendation:**

Officers referred to comments and recommendations outlined in Section 4 in relation to Themes 2 (*Reducing urban sprawl and developing in the City (and Central City) ahead of the surrounding districts*) and 6 (*Transport needs and implications, including for public and active transport*).

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

Planning for other transport options for such towns needs to take place now.

**Hearing Panel discussion and recommendation:**

We understand that the option of rail services in Greater Christchurch is being considered as part of the Greater Christchurch Future Public Transport Business Case. No changes are recommended in response to this submission point.

Encourage key worker housing (such as nurses, police, teachers).

**Hearing Panel discussion and recommendation:**

Officers referred us to the comment and recommendation outlined in Section 4 in relation to Theme 9 (*Provision of social and affordable housing, and a range of housing types*).

The purpose of a social and affordable housing action plan would be to enable social and affordable housing across Greater Christchurch. However, specific details of such an action plan have yet to be determined. The action plan is discussed in Section 5.1 and Section 6.2 of Our Space. This may help to facilitate housing for such workers.

We accept the officers' position that no changes are required and no changes are recommended as a result of this submission point.

Basing projections on high post-EQ rates is dangerous.

**Hearing Panel discussion and recommendation:**

Officers noted that the projections are only the starting point for spatial planning. For instance, the setting of territorial authority housing targets in Our Space reflects projections over the medium term, but over the long term it was considered that simply duplicating projections would not take account of Greater Christchurch's unique post-earthquake circumstances and may not align with the strategic goals of the Urban Development Strategy to increasingly enable growth through redevelopment. Hence the adoption of the transitional approach to territorial authority housing targets in Our Space that allows for a greater share

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of new households to be supported through redevelopment in the City over the long term. Greater Christchurch targets still provide for projected demand over the long term, it is in the apportionment between territorial authorities that Our Space differs from current projections.

We are satisfied with the officers' response. In addition, we note there are a number of other considerations such as ability to service, maintenance of a compact urban form, and presence of natural hazard which will all contribute to whether it is appropriate to develop in a particular location.

We accept the officers' recommendations and do not recommend any changes as a result of this submission point.

### **Landowners ODP 12 Rolleston (091)**

Landowners supporting inclusion of existing greenfield land (within PIB) on East Maddisons Road, Rolleston.

#### **Hearing Panel discussion and recommendation:**

We heard from Ms Holton regarding low value rural land which has been identified in Our Space as a Future Development Area. Ms Holton described how the area (known as ODP Area 12B) at the southern end of Rolleston was not included in the Land Use Recovery Plan changes to the Canterbury Regional Policy Statement. The land is low value rural land that is not of use for much more than grazing horses. Ms Holton advised that she had provided submissions to the Minister on the Land Use Recovery Plan. A copy of the submission to the Minister was attached to her submission. The submission was not supported, and the land was subsequently not included in Map A, Chapter 6 of the Canterbury Regional Policy Statement. Ms Holton described how, in response to questions from the Panel, how this was a constraint to development. Ms Holton generally supported the Our Space document, which identifies the land in which she has interest as a Future Development Area (notated orange in Figures 15 and 16 of the Strategy), although she remained concerned that she had been advised that a private plan change would be required to release the land.

It is noted that changes will still be required to both the Canterbury Regional Policy Statement and the relevant district plan in order for subdivision and development to occur on the site, and that further discussions are required with Selwyn District Council as to timing.

No changes are recommended as a result of the submission.

### **John Law (092)**

Landowner seeks inclusion of additional land (outside the PIB) for industrial use on Main South Road. Considers that the CRPS inadequately accounts for future industrial development trends.

#### **Hearing Panel discussion and recommendation:**

Officers referred to the comment and recommendation outlined in Section 4 in relation to Theme 4 (*Need for further greenfield areas, including specific sites proposed in each district*) in the officers' report. The officers' position is that no new industrial areas should be proposed, given the significant oversupply of industrial land in Greater Christchurch to meet long term demand identified in the Capacity Assessment. They noted that while there may be reasons other than land supply which weigh in favour of enabling the rezoning of this land, the appropriate process to consider the merits of any expansion of the Projected Infrastructure Boundary and/or other enabling policy changes is during the review of Chapter 6 of the Canterbury Regional Policy Statement scheduled for 2022 as part of the review of the Canterbury Regional Policy Statement. This review is identified in Section 6.2 in the schedule of future work.

We accept the officers' position on this, and no changes are recommended as a result of this submission point.