

[Ourspace@greaterchristchurch.org.nz](mailto:Ourspace@greaterchristchurch.org.nz)

**Submission on Our Space 2018-2048: Greater Christchurch Settlement Pattern Update**

Submitter name: Townsend Fields Limited  
 Address: 282 Durham Street North, level 5, Christchurch 8013  
 Email: steve@wakefieldservices.co.nz

No I do not wish to speak at the hearing, but I wish to be informed so I can attend

Preferred location to Speak at hearings (in 2019):  
 Christchurch City Rangiora

Contact number:

The National Policy Statement for Urban Development Capacity (NPS UDC) requires Councils to undertake a Capacity Assessment to estimate the demand for residential and business land to determine whether there is sufficient, feasible development capacity for growth needs of the District over the next 30 years (2018 – 2048). In undertaking this assessment, Council must take into account relevant Regional and District Plan provisions, the likely availability of development infrastructure, the current feasibility and the rate of uptake of capacity, along with the market response in relation to what has been built, where it has been built and at what price. The Our Space update released for consultation summarises the findings of the Capacity Assessment that has been undertaken.

This submission relates primarily to the Waimakariri District portion of the proposal.

The Market Economics report entitled "Waimakariri District Residential Feasibility 2018", dated 28 September 2018 and other various reports for Greater Christchurch and "Our Space" identifies that there is a shortage of sufficient feasible land in Waimakariri District to cater for the medium (2018-2028) and long term (2028-2048) housing development capacity scenarios in respect of Waimakariri District's proposed contribution of 15% capacity towards the long term growth of Greater Christchurch.

The Market Economics report summary states that the economic models undertaken show that most of the residential development capacity in the district's zoned areas 'greenfield priority areas' are likely to be become feasible within the coming 30 years. The report considers the current 1600 house capacity available in the District is sufficient for the short term, that 6,200 are required for the medium term (with 4,800 – 5,400 feasible capacity, with a shortfall of 1,400 houses) and that 15,600 are required for the long term (with a shortfall of 9,500 houses). The Market Economics report identifies that there will be 2-3 District Plan Reviews and ten Housing Development Capacity Assessments over the next 30 years to provide opportunity to re-zone additional land and re-evaluate housing sufficiency for the District.

The models used by Market Economics are based on certain assumptions. The model that tests feasibility, uses land that is currently "zoned in the Greater Christchurch within Waimakariri District and not yet subdivided (Greenfield land)". The second model tests the feasibility of a building on "infill, greenfield and subdivided land".

It is not clear whether land that is within a current Greenfield Priority Area (Map A – Chapter 6 of the Christchurch Regional Policy Statement) but is currently un-zoned (i.e. in South West Rangiora: Johns Road) has been considered in the figures used by Market Economics for Waimakariri when considering housing capacity calculations.

"Our Space" identifies that the projected shortfalls must be resolved by a combination of a change to the Canterbury Regional Policy Statement (CRPS) (Map A) to make provision for additional residential

development "Future Development Areas" within the existing Projected Infrastructure and subsequent changes to assess and potentially re-zone land through the Waimakariri District Plan as part of the District Plan Review. It is noted that if "Our Space" is adopted, then the proposed changes to the CRPS will occur in 2019 (next year) and that the District Plan review will continue this process from 2020 onwards, both of which are to facilitate Waimakariri District's ability to meet its required housing capacity target.

It is acknowledged that there is an expectation that some housing supply will come from the intensification of existing urban areas, and this will form part of the Waimakariri assessment for the District Plan review. However Market Economics<sup>1</sup> made the following observation of housing in the District: "... the bulk of dwellings are single level standalone houses on freehold sites. There are a small number of attached houses, which are mainly single level units and some double level townhouses. There are no multilevel apartment blocks in the District. This is important as it shows that the types and nature of development which has been demanded in the past."

The above suggests that re-zoning additional land to support the type of housing typically sought in Waimakariri District is likely to be the primary way to supply additional housing capacity to the local market in Waimakariri, rather than relying on township intensification, and housing typologies that are not common in the District.

Effectively, the proposed change to the CRPS and Map A identifies that all remaining rural land within Rangiora's current Projected Infrastructure Boundary (urban limit) as being a "Future Development Area", to which "Our Space" indicates that the District Plan process will seek to re-zone.

This is considered appropriate as it will enable the provision of infrastructure in a sequential manner to the residential new areas identified. It will also require Council to comprehensively address any existing constraints that relate to these sites.

As landowners of existing un-zoned (Rural) Greenfield Priority land on Johns Road Rangiora currently identified by the CRPS for future residential development it is the submission of Townsend Fields Limited that:

- That "Our Space" as proposed is supported and should be adopted.
- That the proposal to accommodate additional housing growth within the current Projected Infrastructure Boundary in Waimakariri District is supported.
- That the immediate changes proposed to the Canterbury Regional Policy Statement in 2019 for the revision of Map A and the inclusion of housing targets is supported.
- That using the imminent Waimakariri District Plan Review to re-zone additional land for residential use to meet the required housing targets for Waimakariri District is supported.
- However, it is submitted that the Waimakariri District Plan review should seek to re-zone existing un-zoned Greenfield Priority Residential land first ahead of any new "Future Development Areas" identified by "Our Space".

From: Townsend Fields Limited  
Steve Wakefield  
Director



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<sup>1</sup> Waimakariri District Residential Feasibility, ME Consulting, 1.1.1 Residential Demand, Page 5