



Submission on Greater Christchurch Settlement Update – Our Space 2018-2048

Lincoln Developments Ltd

November 2018

Greater Christchurch Partnership

Submitter Details

Name: Lincoln Developments Ltd

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Resource Management and Planning
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Contact Person: Fiona Aston

Hearings:

I wish to speak at the hearings.

Preferred location: Selwyn District Council

Contact number: C/- Aston Consultants Ltd. Contact details as above.

Background:

The following background provides the context to this submission on **Our Space**. The Submitter, Lincoln Developments Ltd ('LDL') has made submissions on the Selwyn District Plan Review and Selwyn Long Term Plan to enable further development of its existing Flemington residential subdivision at north Lincoln. It wishes to continue development northwards to Tancred Road, onto land currently zoned Rural Inner Plains. A copy of the LTP submission is attached as **Appendix B**.

Tancreds Rd is the logical long term urban boundary for north Lincoln between Birchs Road and Ellesmere Road. It is already the zoned northern limit of urban development west of Birchs Road. This land should be rezoned progressively 'over time' to Living Z to meet the projected ongoing demand for sections in this part of Lincoln, and to achieve a logical 'urban form'.

Flemington subdivision has a land area of 58ha and is now largely developed. A minimum of 33.68 ha of land needs to be rezoned now to enable development to proceed to meet demand. The balance of the land between the current urban boundary and Tancreds Road west of Birchs Road (as shown on the **Appendix A** map) should be identified as a Future Development Area.

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Please note that since the Long Term Plan submission was lodged in May 2018, LDL have elected not to proceed with purchase of the Lincoln North block (8.6ha owned by J & M Cooke). This block is zoned Living Z and adjoins the north boundary of the Flemington subdivision (and is within ODP Area 3). This would have accommodated another 50 sections and a potential commercial area of just under 2ha. The commercial development is now likely to proceed on land to the south, owned by LDL and already approved for residential subdivision (an amended subdivision consent is in preparation). This will mean the loss of 20-30 residential sections from the existing LZ zoned area.

Relief Sought:

The changes which the Submitter requests are in line with its responses and reasons are outlined below. Additions are underlined and in bold and deletions are strike through.

1. Amend **Our Space** Fig 16: Proposed locations of future development areas in Greater Christchurch as follows:-

Amend by adding additional Greenfield Priority – Residential and Future Development Areas at north Lincoln as shown on Appendix A map ‘Lincoln – Additional Greenfield Priority – Residential and Future Development Areas’

2. 6.2 Schedule of future work

Amend 8 (page 34) as follows:-

Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement as follows:-

- amending Map A to be consistent with the relief sought in this submission (including 1. above and 3. below); and
- provide flexibility to accommodate meritorious proposals for urban development and zoning and to facilitate a responsive planning approach to management of urban growth of Greater Christchurch by amending and adding to the objectives and policies as follows (insertions in bold and underlined):-

Add new Policy 6.3.1A as below:-

Policy 6.3.1 A

(a) Enable urban development or urban zoning outside the Greenfield Priority, Special Housing Areas and Existing Urban Areas shown on Map A provided the following conditions are met:-

(i) Any additional land is contiguous with a Greenfield Priority Area, Special Housing area, or Existing Urban Area; and

(ii) Any additional land will integrate with the provision of infrastructure; and

(iii) Any additional land is a logical addition to the urban area and will contribute to a consolidated urban form; and

(iv) The urban development or urban zoning will have beneficial planning outcomes; and

(v) All of the criteria in Policy 6.3.11 (5)(a) to (g) inclusive are met.

Explanation:

This policy confirms the requirement for urban development to be contained within Greenfield Priority, Special Housing and Existing Urban Areas but provides some flexibility to accommodate meritorious proposals and to facilitate a responsive planning approach given the uncertainties associated with the housing and business land capacity assessments which have informed Map A, and with the primary drivers and influencers of urban development in Greater Christchurch.

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:....

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS **or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;**

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS **or which have minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;**

6.3.7 Residential location, yield and intensification

In relation to residential development opportunities in Greater Christchurch:

7. Subject to Policy 5.3.4, residential greenfield priority area development shall occur **generally** in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.

3. Specify in **Our Space** that Fig 16 be included in District Plans rather than the Canterbury Regional Policy, thus facilitating the ability for private plan requests for changes to the same, with appropriate criteria for assessment being included in the CRPS and/or District Plans; or as a less preferred alternative, other methods to retain flexibility and 'future proofing' to respond to meritorious housing and business development proposals which give effect to the NPS-UDC but are not recognized or provided for in **Our Space** and supporting documents.

4. Consider other amendments to the CRPS and other documents and other actions which are appropriate to facilitate a responsive planning approach to management of urban growth of Greater Christchurch.

5. Consider streamlined RMA or other processes to facilitate the amendments sought which are specific to the Submitters' land and which provide flexibility to provide for meritorious zoning and urban development, including associated policy wording. Do not use streamlined processes for implementation of the overall **Our Space** strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.

6. Any further, consequential or alternative amendments to any documents, and other actions which meet and give effect to the intent of this submission.

Reasons for Relief Sought:-

1. For the reasons set out in LDL's responses to the Submission Form questions below.
2. The housing and business capacity targets, urban form outcomes, and Schedule of Future Work measures (including changes to the CRPS) contained in '**Our Space**' will have a

profound and defining effect on the Greater Christchurch settlement pattern for the next 30 years. There will be significant flow on effects for the local, regional and potentially national economies. There is an acknowledged high level of uncertainty with the housing and business lands capacity assessments. The adopted approach is aspirational and untested with its focus being redevelopment and intensification of existing urban areas, underpinned by an as yet unfunded “*vision for transformation of the transport network that fosters much greater public and active transport usage, and reduced reliance on the private vehicle*”.¹ Despite this, there is no s32 assessment accompanying **Our Space**.

3. The amendments sought will enable land at north Lincoln between the current urban boundary and Tancreds Road, west of Birchs Road, to be used in the most appropriate, effective and efficient way which will achieve the purpose of the Resource Management Act 1991 (the Act).
4. **Our Space** as notified proposes an urban growth management approach, in particular as it affects Lincoln township, which is inconsistent with and does not give effect to the Act, including Part 2 and Section 32, and other relevant statutory and non statutory matters.
5. The **Our Space** housing land development capacity targets are uncertain, inaccurate and based on a flawed methodology.
6. **Our Space** considers a responsive planning approach to future the management of the Greater Christchurch urban growth but does not facilitate or enable this, whereas the relief sought is this submission does.
7. **Our Space** as notified is contrary to and does not give effect to the National Policy Statement – Urban Development Capacity (NPS – UDC) in particular Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points.
8. A fixed uncontestable urban/rural boundary line for Greater Christchurch as proposed by **Our Space** is unlikely to facilitate the urban form sought by **Our Space** including for the following reasons:-
 - Overly strict limitations on peripheral growth causes excessive land price inflation that in turn has a very negative effect on housing affordability;
 - A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than “land bank” (because there is excessive capital gain due

¹ Open Space p 19

to scarcity of land supply);

- Containment and higher land values does not facilitate intensification;
- If the Central City and the Key Activity Centres are attractive the market will locate there by people's choice. Generally carrots are better than sticks to achieve desired planning outcomes.

Housing Growth:

Question 1:

Our Space highlights there is significant capacity for new housing through redevelopment in Christchurch City but to accommodate housing growth in Selwyn and Waimakariri it identifies additional greenfield land around Rolleston, Rangiora and Kaiapoi.

Do you agree with this approach and why?

Response:

Our Space has a 30 year time horizon. It makes no provision for further greenfields development in Selwyn District, other than at Rolleston. Its housing capacity assessment treats Selwyn District settlements combined as a single housing market. This approach is flawed, not supported and is contrary to the National Policy Statement – Urban Development Capacity (NPS – UDC) in particular Policy PB1 which requires housing capacity supply to meet demand for different types, locations and price points. Each township has a different character, housing market and demand profile.

Lincoln is a Key Activity Centre. **Open Space** proposes to consolidate urban development in and around the larger towns in Selwyn and Waimakariri and also respond to the anticipated strong demand for high density housing in the City. Despite this approach, no provision whatsoever is made for further growth beyond the existing greenfield areas at Lincoln. This is contrary to the above 'consolidation' approach.

There is clearly a strong unmet demand for further greenfield development at north Lincoln in a location which will have 'urban form' benefits i.e northwards to Tancreds Road.

Open Space acknowledges that its housing capacity work is uncertain, in particular assessment of the commercial feasibility of development, and that work is required to improve the modelling tools used. It recognizes that given the range of reported feasibility, capacity may not be sufficient

to meet demand over the medium term in Waimakariri and Selwyn.² Notwithstanding no provision is made for further capacity in the medium capacity anywhere in Selwyn, and only at Rolleston in the long term. **Our Space** also recognizes that a responsive planning approach is required given the many uncertainties associated with the primary drivers and influencers of urban development in Greater Christchurch.

Our Space as it affects Lincoln township is the opposite of 'responsive' planning, and does not facilitate resilience which requires the ability to respond with options in the face of an uncertain future and/or major unforeseen events. For example, Greater Christchurch was able to respond and recovery relatively quickly from the 2010/2011 earthquake sequence because substantial areas of greenfield housing in Selwyn and Waimakariri Districts in particular (but also at Prestons and south west Halswell) were able to be brought 'on line' quickly.

Question 2:

Our Space adopts the current planning framework that encourages a range of new housing types, especially in the central city, close to suburban centres within the City and around existing towns in Selwyn and Waimakariri.

Do you agree with this approach and why?

Response:

No comment other than to note the experience at Flemington is that there is strong demand for small lot medium density lots in the 300-500m² size range which can accommodate single storey stand alone 2-3 bedroom houses with double garage. There is very little if any demand for comprehensive medium density housing (300m² and less and generally two storey terrace and duplex housing). Requirements for comprehensive medium density housing to be erected to roof stage prior to issue of title is challenging and not 'workable' for development financing.

Question 3:

Our Space proposes to develop an action plan to increase the supply of social and affordable housing across Greater Christchurch and investigate with housing providers the different models to make it easier for people to buy their own home.

² Our Space page 13

What elements should be included in this action plan?

Response:

No comment.

Business Growth

Question 4:

Our Space adopts the current planning framework that directs new commercial development (office and retail) to existing centres to retain their flexibility and vitality, especially the central city, suburban centres and town centres in Selwyn and Waimakariri.

Do you agree with this approach and why? What further measures would support such development?

Response:

No comment.

Question 5:

The Canterbury Regional Policy Statement and the District Plans for Christchurch City and Selwyn and Waimakariri Districts have already identified suitable capacity for new industrial businesses.

Do you agree or disagree this is sufficient and in the right location and why?

Response:

No comment.

Growth needs

Question 6:

The proposals in **Our Space** are informed by a Capacity Assessment that considers future demands for housing and business land, based on demographic changes and projections from Statistics New Zealand, and likely changes in our economy, including through business sector trends and impacts from technological change.

Do you agree or disagree with this evidence base and why?

Response:

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No – see response to Question 1 and Reasons for Relief Sought above.

Transport and other infrastructure

Question 7:

Our Space promotes greater densities around key centres to increase accessibility to employment and services by walking, cycling and public transport. This aligns with recent transport proposals that signal more high frequency bus routes and in intention to deliver rapid transit along the northern and south-west transport corridors.

Do you agree or disagree with this approach and why?

Response:

No response, other than to note Flemington subdivision has been developed so that it can accommodate public transport routes (bus routes) and there are options for the Rail Trail to extend through the subdivision linking with the Lincoln town centre.

Question 8:

Our Space aligns with broader infrastructure planning (including wastewater, water supply, stormwater, energy, telecommunications, community facilities, schools and healthcare) to help create sustainable, cohesive and connected communities.

Do you agree or disagree with this approach and why? What more could be done to integrate infrastructure planning?

Response:

No response, other than to note that there are no known servicing issues with residential development of land north of the existing Flemington subdivision to Tancreds Road.

Other

What other points do you wish to make to inform the final **Our Space 2018-2048 Greater Christchurch Settlement Update**?

Response:

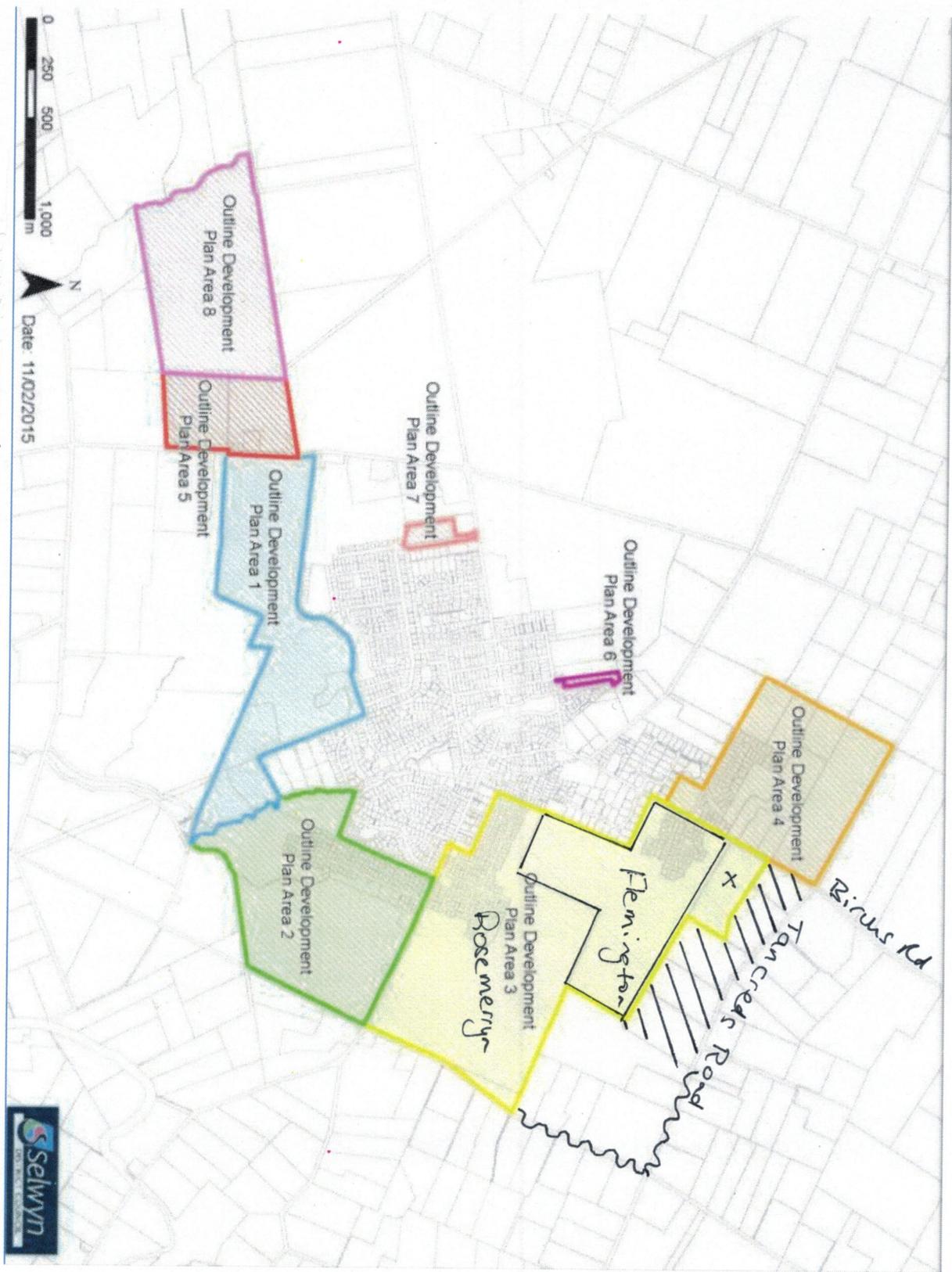
No further comments other than as noted above under 'Submitter Background', 'Relief Sought' and 'Reasons for Relief'.

Appendices

Appendix A: Amendments to Outline Development Areas – Lincoln

Appendix B: Submission on Selwyn Long Term Plan 2018-2028

Lincoln - Additional Greenfield Priority - Residential + Future Development Areas



Greenfield Priority Area - Residential
Large Town Lincoln North Boundary (post 2028) - Future Development Area
North Block.



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SUBMISSION ON SELWYN DISTRICT PLAN LONG-TERM PLAN 2018 – 2028

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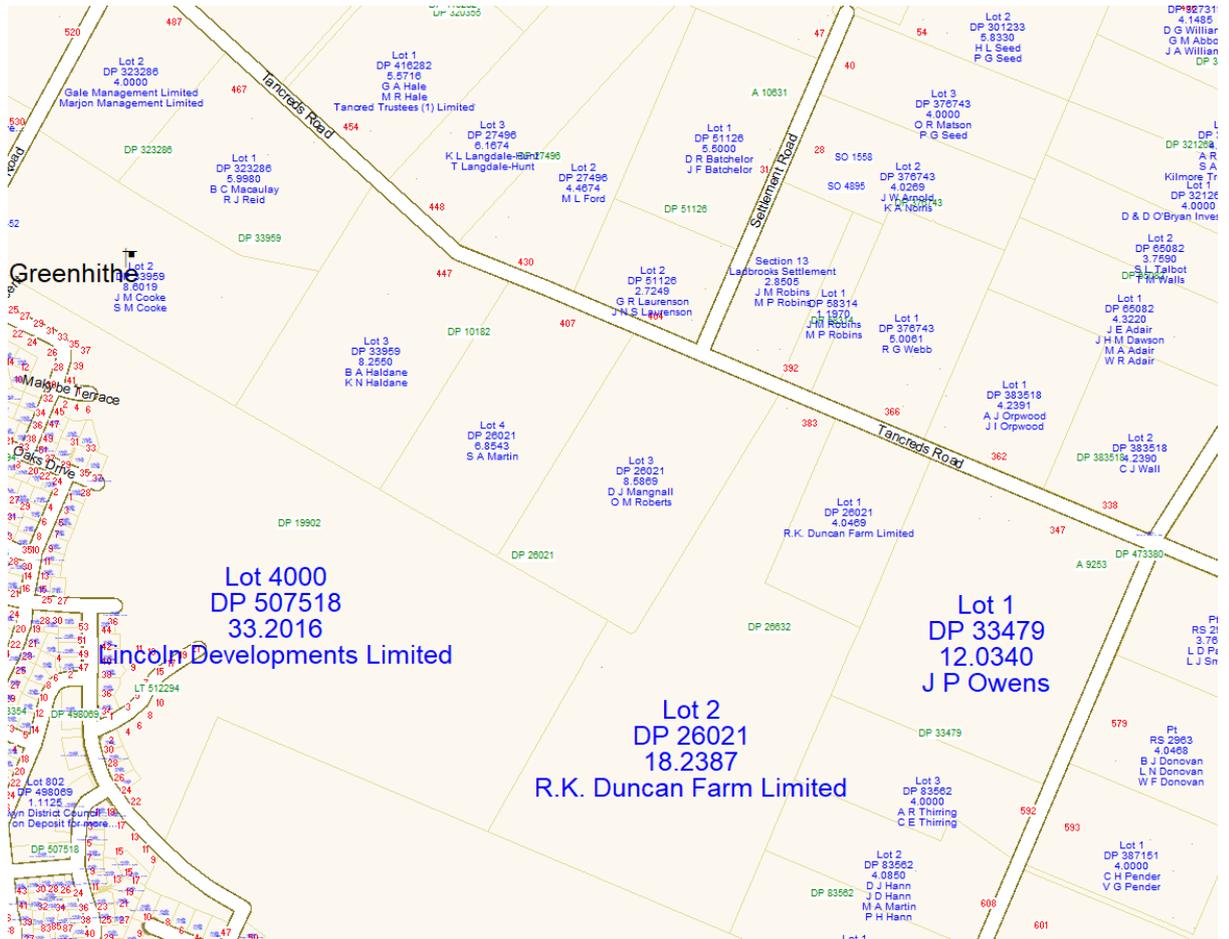
Our Submission:

We seek amendments to the Selwyn District Long-Term Plan 2018-2028(LTP) in order to make appropriate provision for servicing Lincoln for urban residential purposed (LZ zoning or equivalent) northwards to Tancreds Rd as shown on the amended Lincoln Outline Development Plans (ODPs) map attached as **Appendix A**.

Reasons for Submission:

1. Tancreds Rd is a logical long term urban boundary for north Lincoln between Birches Road and Ellesmere Road. Tancreds Road is already the zoned northern limit of urban development west of Birches Road. This land should be rezoned progressively 'over time' to Living Z to meet the projected ongoing demand for sections in this part of Lincoln, and to achieve a logical 'urban form'.
2. A minimum of 33.68 ha of land currently zoned Rural Inner Plains on the east side of Birchs Road between the current urban boundary and Tancreds Road and north of the Flemington development should be rezoned now to meet demand over the LTP planning period i.e. land legally described as:-
 - Lot 2 DP 323286 (4 ha);
 - Lot 1 DP 323286 (5.998 ha);
 - Lot 3 DP 33959 (8.255 ha);
 - Lot 4 DP 26021 (6.85 ha);
 - Lot 3 DP 26021 (8.58 ha);

(see also copy of relevant Quick Map with location of above sections below)



3. The balance land currently zoned Rural Inner Plains between the current urban boundary and Tancreds Road and west of Birches Road should identified for urban development in the Future Development Strategy required under the National Policy Statement – Urban Development Capacity (NPS – UDC) – in accordance with the amended Lincoln ODPs map in **Appendix A**.
4. There will be a need for further development land in north of the Flemington North block within the next 3 years to meet demand. Flemington subdivision has been developing residential sections for 4 ½ years now and has sold approximately 430 of the 615 sections it had to offer. Flemington has a land area of 58ha and has recently purchased 8ha to the north which will accommodate another 50 sections and a potential commercial area of just under 2ha. Our timeframe to complete the Flemington subdivision and the new land to the North is approximately 3 years.
5. We have made provision for access roads into the land between the North block and Tancreds Road for future development as this is the obvious growth area for Lincoln. The north eastern portion of the approved subdivision plan for the original 615 sections has not yet been developed, and the section layout enables sections to be retained by the developer to facilitate future development to north.
6. Our neighbouring subdivision Rosemerryn is 900 sections and is over 50% complete while Barton fields subdivision has completed their first stages and are now looking at some future development opportunity on the opposite side of Birches Road to Flemington.

7. The proposed northern urban extension is a total of 33.68 ha and will provide a yield of approximately 357 sections¹. Based on an anticipated development rate of 70- 80 sections pa, this will provide a further 5 years supply.
8. The land needs to be rezoned now to provide for the timeline for consenting and construction ahead of titles being issued and sections being available for sale. There is generally a subdivision lead time of at least 12-18 months.
9. There are no known development constraints that would preclude urban development of this land.
10. Lincoln Developments Ltd have an excellent proven subdivision track record and are committed to an ongoing subdivision presence at Lincoln.

We do wish to be heard in support of our submission.



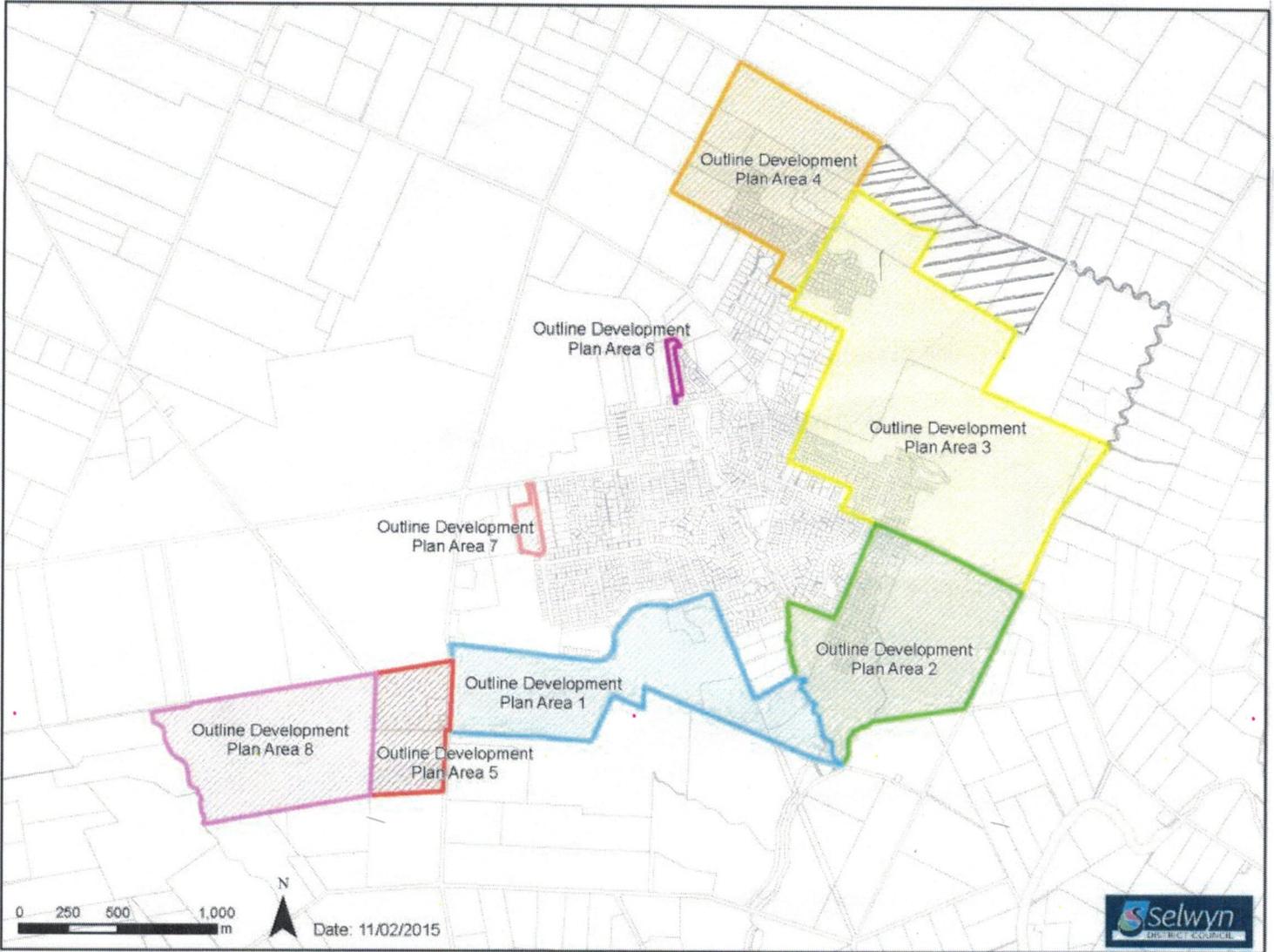
4th May 2018

.....
Principal Aston Consultants
For Lincoln Developments Ltd

Appendix A: Lincoln Outline Development Plans map – amended to show land required for residential development 2018-2028 and Lincoln North long term boundary

¹ Based on the same yield as the original Flemington subdivision i.e. 10.6 households per ha including stormwater management areas

Outline Development Areas for Lincoln - Amended



Residential development land required 2018-2028
Re-zone Living 2 now.



Longer term Lincoln North urban boundary (post 2028)
Include in Future Development Strategy