Technical Advice to the Hearings Panel of Our Space: 2018 – 2048, 28 February 2019

Waimakariri District Council

1. Introduction

1.1 The Waimakariri District Council (WDC), would like to thank the Hearings Panel for the opportunity to address issues identified with the evidence from Submitter 74 Christchurch City Council stated as 'Supplementary Technical Advice' dated 15 February (Technical Advice)". We note we have been asked to "identify (and correct) factual issues and identify any issues of opinion for the Panel to consider". In both respects the Technical Advice addresses matters on which we have previously provided advice on to the Panel via the Officer's Report at pp96-97 and pp101-102. This technical advice note from WDC should be read in conjunction with those other comments and we endeavor not to repeat material. For the sake of completeness there is some overlap here.

1.2 By letter dated 22 February 2019 the following position was outlined to the Chair of the Hearings Panel:

> *WDC is a partner in the Greater Christchurch Partnership (**GCP**). Consequently, WDC has worked collaboratively with the other partners for over a decade on planning for and managing urban growth and development in Greater Christchurch. The sharing of information relevant to planning and managing urban growth is an important part of working collaboratively.*
>
> *Prior to Christchurch City Council (CCC) submitting its evidence, WDC was satisfied that differing views of the GCP partners on key matters (including in relation to the consideration of densities and sequencing of housing development) were identified and discussed in the officer's report dated 8 February 2019 (**Officers Report**).*
>
> *CCC's evidence (as submitted on 15 February) provides new and additional information that is not identified nor discussed in the Officers Report. The content of CCC's evidence was not known to WDC until receipt.*
>
> *In the course of reviewing CCC's evidence, WDC staff have identified material inaccuracies relevant to planning and managing urban growth and development in Greater Christchurch, and particularly for Waimakariri District.*

1.3 WDC would like to identify each of the issues and inaccuracies contained in the Technical Advice under the following headings:

- Housing sufficiency numbers to inform an appropriate planning and policy response
- Housing densities
- Sequencing

1.4 Each issue/inaccuracy will be identified by page number and paragraphs from the Technical Advice with the response and recommendation from WDC.

2. Housing sufficiency numbers to inform an appropriate planning and policy response

Issue #1 – Page 2 4th Paragraph - inclusion of Rural in Population Projections

2.1 The Technical Advice identified that "(potential) rural demand (within the GCP area) but not rural supply was included in the sufficiency figures for Waimakariri and Selwyn". While this is correct, this same approach was adopted by CCC. During the development of the capacity assessment, the population projections were developed in collaboration with all four Council with responsibilities under the National Policy Statement for Urban Development Capacity (NPS-UDC). At all levels of the partnership, the populations projections were agreed to, by the project team (for the capacity assessment/future development strategy), Senior Management Group, Chief Executives Advisory Group and finally at the Greater Christchurch Partnership Committee. A decision was made early by the four Council to use the GCP Area[1] as the study area for the NPS-UDC. With that decision, the population projections for that area was sourced from Statistics New Zealand. The area units which the Partners uses in the projections have been listed on Appendix 4, page 112 of the Business Capacity Assessment (and were also used for the Housing Capacity Assessment). This table states all Area Units were used for the City's population projections. Some of these areas units contain rural areas zoned by the City's District Plan. Therefore if it is preferred that rural capacity for Waimakariri and Selwyn is addressed in the "Our Space" document, then for consistency purposes the same approach is appropriate for the Christchurch City area; amending Table 3 to reduce the capacity as recommended by the Officers as well.

2.2 Recommendation: Modify Table 3 of Our Space document to also reflect rural demand in the Christchurch City area.

Issue 2- Page 3, continuing 1st Paragraph, 2nd and 3rd Paragraph – Rural/Urban uptake and capacity

2.3 The Technical Advice makes a number of errors in these paragraphs which needs to be carefully address for the Panel.

Quote - "slowdown not only in the uptake or rural capacity but also in other parts of the districts"

2.4 This is incorrect. Appendix 1 shows that comparing approval of new dwelling consents for the same period (July to Jan) 2017/18 and 2018/19 shows that approvals are higher (by 102 Building Consents in the current financial year) in both in the overall Waimakariri District and in the Waimakariri GCP Area. This does not evidence a slowdown.

2.5 However as stated by WDC in the Officers Report page 108, rural demand has been steadily declining over the past two to three years and is very uncertain at present. To prove this, Appendix 2 shows New Dwelling Building Consents in GCP Rural Area of Waimakariri. This clearly shows the decrease in this trend over a wider period than just the recent two to three years which has decrease from 49 in 2015 to between 28 and 29 in 2016, 2017 and 2018.

2.6 This trend is also consistent in the wider Waimakariri District. An additional graph in Appendix 2 also shows this trend.

[1] Metropolitan urban areas of Christchurch and the area of Selwyn (which includes the townships of Rolleston, Lincoln, Prebbleton, West Melton, Tai Tapu and Springston and the rural areas in between these townships) and Waimakariri (which includes the townships of Rangiora, Kaiapoi, Woodend and Pegasus and the rural areas in between these townships).

2.7 Recommendation: No change is required to Our Space

Quote, para 2 Page 3 - "Analysis of Stats NZ population estimates show that rural uptake is much higher than suggested in the officer's report. Based on this data and data in the background information to the Waimakariri District Development Strategy, Population growth over ten years in rural areas is likely to be closer to 1,000 households in Waimakariri and 1,400 for Selwyn".

2.8 This statement is incorrect. From the supply side, page 140 of the Housing Capacity Assessment (Section 2.1.2) clearly states in terms of capacity of zoned land the following approach for Selwyn and Waimakariri was used:

"Within Selwyn and Waimakariri districts, zoned land is identified by township and the various Living or Residential zones contained within them. This is inclusive of the Selwyn District Plan Living 3 (Rural Residential) or Waimakariri District Plan Residential 4a and 4b zones that are located on the edge of or near existing townships and enabled through Councils adopted Rural Residential Strategies and Policy 6.3.9 of the CRPS (see Appendix 6). This evaluation excludes rural zones and Existing Development Areas/Small Settlements under both district plans that are historic lifestyle living/residential zones which are in most cases located within the rural environment in isolation of townships.

2.9 In the Capacity assessment both Selwyn and Waimakariri has considered Rural Residential areas as part of the urban supply, for the following reasons:

- Activities below 4 ha are classified as Urban Activities under the Canterbury Regional Policy Statement (CRPS)
- To comply with Policy 6.3.9 of the CRPS, rural residential areas need to be developed in accordance with an adopted rural residential development strategy.
- Rural Residential Development Strategy has been developed by Waimakariri District Council
- The land is zoned Residential 4a and 4b in the Operative Waimakariri District Plan, which is a rural residential zone

2.10 For Waimakariri, a rural residential development strategy has been in place since 2010 and has identified the following areas in GCP Area of Waimakariri:

- Fernside
- Mandeville
- Ohoka
- Rangiora
- Kaiapoi

2.11 To then be consistent with the capacity or supply side of the equation, both Selwyn and Waimakariri have used these rural residential areas in considering future demand. While the 'Livingstone's report' (an 'Our Space' technical report addressing housing demand) has classified Mandeville and Ohoka as rural, this was only in consideration of the Area Units called "Mandeville and Ohoka" and did not consider the urban activity that was occurring in these areas (which is rural residential under the CPRS/District Plan). In short these area units were misclassified by that report writer as "Rural". To clarify the situation Waimakariri staff believe that the Livingstone report is updated to reflect how Selwyn and Waimakariri has treated rural residential supply and demand, so that anyone reading the capacity assessment in the future does not make the same mistake as the CCC has in their evidence.

2.12 Appendix 3 of this response outlines the calculations used to determine the capacity of approximately 400-500 units for rural, once Mandeville and Ohoka have been included in the urban calculation for demand and supply. As a peer review, Waimakariri has also compared two additional data sources to consider the robustness of this range of capacity. This information is contained in Appendix 4 below and uses data source from QV and building consent data held by WDC.

2.13 Table 1 shows as summary of the results from the three data sources:

Table 1: Summary Table of Results – Estimates, QV and Building Consents

	QV	BC	Stats NZ Estimates
2009 to 2018 (ten years)	450	440	488
2008 to 2017 (ten years)	520	490	496

2.14 This table outlines via three different data sources the uptake of rural capacity in the GCP Rural Area of the Waimakariri District. This is the reason why WDC suggested in the officers report that rural capacity uptake in the next ten years could be between 400-500. However the City in their technical evidence also gave no consideration to the final point made by Waimakariri in regards to any potential impact of any policy changes identified by Councils as part of their District Plan Reviews which could impact on demand over the next ten years. This is again why we raised the rural capacity uptake numbers could be ambiguous to include in Table 3 of 'Our Space".

2.15 The Officers Report have included an updated Table 3 of Our Space to reflect the rural demand to be removed from the Medium / Medium to Long Term sufficiency capacity with the following note to the number

**** These sufficiency figures have been adjusted to discount the demand over the medium and long term likely to be met through uptake of development in rural zoned areas (averaging 70 dwellings/year for Selwyn and 50 dwellings/year for Waimakariri). Demand met through capacity in rural areas will be reviewed following the review of rural zoning as part of respective District Plan Reviews in Selwyn and Waimakariri.*

2.16 WDC agrees with this approach identified by the Officers in their updated version of Our Space and addresses the concerns raised by the Council in its additional comments to the Officers Report.

2.17 Recommendation: Amend Table 3 to adjust capacity to take into account rural demand; as - outlined in the Officers amended version of Our Space

Issue 3 – Page 4 1st and 2nd Paragraph - Feasibility

2.18 The position in the Technical Advice is that-:

Quote "question the recommended approach to report a range of sufficiency figures/scenarios, based upon a range of feasibility modelling results".

2.20 Waimakariri and Selwyn Councils have provided the most robust assessment in regards to feasibility contained in Report 3 of the Housing Capacity Assessment (starting on page 218) and an additional report on feasibility development on behalf of the Councils by Market Economics.

2.21 It is important to stress that the model developed by Market Economics is currently be used by significant number of the high growth councils identified in the NPS-UDC (except Auckland and Christchurch).

2.22 Three approaches have been used, they are:

- assessment based on the assumption that all remaining housing capacity is 100% feasible, however:
    - this does not comply with the requirements of the NPS-UDC but is included in Table 3 of the draft "Our Space" document.
    - it does address rate of take-up of development capacity as required by NPS Policy PB3d (page 226 of the housing capacity assessment)
- assessment based on feasibility capacity using current prices only, however
    - this does comply with the requirements of NPS-UDC and the guidance released by MBIE/MFE on this issue
- assessment based on feasibility capacity using future prices only, however
    - this does not comply with the requirements of NPS-UDC and the guidance released by MBIE/MFE on this issue

2.23 There are advantages and disadvantages to all three models that have been used to assess feasibility. For example Market Economics drafted a report which went into some detail that the assessment based on feasible capacity using current prices was significantly flawed and that future prices provided the most realistic results for feasibility. However as the Technical Advice identifies, MBIE/MFE released guidance states that this type of scenario can only be used as a sensitivity test.

2.24 Reporting Officers have considered this issues after considering the CCC evidence and have suggested the existing Table 3 in 'Our Space' using the assumption for Selwyn and Waimakariri Districts that all development capacity remaining be used to assess feasibility. WDC understands the reasoning behind this recommendation but believes it does not go far enough to consider in the footnote that there is the need to include the full range of both current prices and future prices. Therefore we suggest that an amendment to the new note '**' below proposed through the Officers Report be made to include a range of both current and future prices so that this acts as the range for sensitivity testing (as promoted by MBIE/MFE in their guidance to Councils). This in our view presents the best option to the Hearings Panel to provide 'one number' as requested by the Technical Advice , but also reflect the inherent uncertainty in robust feasibility assessment that all high growth Councils have struggled with by indicating alternative modelled scenario(s) that the reader should be aware of when considering "Our Space".

2.25 Recommendation: Amend Table 3 Note ** to read as follows

***** These capacity figures are derived from a qualitative assessment of Greenfield land only. Two alternative modelled scenarios were considered, including existing zoned land and incorporating either no changes/ or changes to prices and costs over time, identified development capacity for the long term of approximately between 1,200 and 9,200 dwellings in Selwyn and 1,000 and 6,100 dwellings in Waimakariri.***

Issue 4 – Page 4 3rd Paragraph (include a and b) – updated data

2.26 Recently on several occasions at GCP staff level and now in the Technical Advice recent short term population change including the CCC growth in population relative to Our Space projections

(page 5) has been suggested as a suitable basis for revising the Our Space minimum housing targets. This is both inaccurate and unwise for the following reasons:

- These are estimates of annual change based on a range of indicators not measured change as in a Census. 2018 Census results will not yet be known for some time. They are short term estimates since the 2013 Census during a highly unusual period in Greater Christchurch's history (see below). History also shows in relation to Waimakariri and Selwyn that annual estimates typically in successive five-year periods under-estimate population growth as verified by Censuses and require retrospective revisions (Appendix 5 of the Business Capacity Assessments outlines that Statistics New Zealand conducted a review of their accuracy of their population estimates. They determined that they had underestimated the population of Waimakariri by 2.2% - 2.9% (between 1996 and 2013) and Selwyn by 5.4% - 6.6% (between 2001-2013). It is also important to identify that the population estimates released by Statistics New Zealand in October 2018 are provisional and not final as stated in the Technical Advice. The revised population estimates will be released in 2019 after 2018 census results are available.
- More significantly however the GCP growth model that was endorse by the GCP Committee in September 2017[2] and is based on a dynamic model of projected household change and long run development activity, in addition to population change. This is because the NPS-UDC through which housing targets are set is households and dwellings based, not based on population targets. The attached graphs in Appendix 5 of this response drawn from SNZ projections, WDC records, information supplied by SDC and from the CCC Monitoring & Research Unit show the medium-high (for Selwyn and Waimakariri) or medium (for the City) growth range in household and recent development activity by each Council area for Our Space.
- Development activity is 'net new building activity' (allowing for earthquake related housing losses) and estimated population change over the last 20 years is also shown for comparison (this includes the provisional population estimates in 2018). It can be seen that WDC and SDC are tracking at or above medium-high household growth and CCC at medium. The most update information from all Councils and Statistics New Zealand has be used to update the model in accordance with the methodology used to determine the original population and household projections model in 2017 for the capacity assessment (appendix 11 page 136 – 145 of the Business Capacity Assessment).
- Recent population change post-2013 (as per point b – bottom of page 4 of the Technical Advice) is also not a reliable indicator of long term change, especially in the CCC area. This is because included in that are long-term migratory labour in Christchurch for the rebuild. It has been estimated that up to around 20,000 internal and international rebuild migrants have been in the City in the last few years. MBIE chart the pre-quake direct and indirect Canterbury construction sector employment at around 25,000, rising to a rebuild peak in about 2016-17 of some 60,000, before gradually declining back to pre-quake levels by the early 2020s. Some migrants have/will stay but others will not because suitable employment is diminishing/not available. This 'rebuild effect' is still in progress and yet to fully play out. It disproportionately affects the CCC area. Longer term tends are yet to become apparent and it is neither reliable nor appropriate to use only six years of data for these very reasons.

[2] http://christchurch.infocouncil.biz/Open/2017/09/GCPC_20170901_AGN_1917_AT_WEB.htm

- The Technical Advice also suggests that the "final population estimates for 2018 also showed that in 2018 the residential population of the Central City grew at a faster rate than Selwyn or Waimakariri". This is incorrect. First of all the population estimates are only provisional estimates with figures not being confirmed until Census data is released. Secondly Appendix 6 of this response shows the population estimates for the Central City (broken into five areas) vs one Area in Rolleston called "Rolleston South East". As the data shows, the population increase in the CBD increase by 310 people (or 5% increase) compared to an increase of 670 people (or 37%) in one part of Rolleston (South East). Indeed Selwyn's overall population gain in that year was 4.8%.
- Until the 2018 Census results are released and in 2020-21 reflected in updated household projections, and as declining over all Greater Christchurch residential construction activity returns to sustainable levels, it would be inappropriate and an inaccurate reflection of the evidence to modify the best available basis for setting housing targets that is currently reflected in 'Our Space'. This is the first year of a thirty-year projections period and to suggest modifying it based on one year's results (particularly results that are only provisional) is considered unwise.
- Recently Statistics NZ fundamentally revised its estimates of long term and permanent migration at a national level that has uncertain but potentially significant sub-national implications, including for population change in Christchurch. A new method of estimation has resulted in a downwards revision of the peak estimated net gain in 2016 of around 70,000 to around 50,000. Similar % magnitude reductions for recent years which are input to annual estimates of the resident population are also evident. In time this will flow through to revised subnational population estimates and the base population for future revisions of population projections. This is another reason why estimated annual population change as discussed in the CCC's Technical Advice is not a useful indicator of change at this time.
- Finally while intensification was the majority of residential development for one year in the City, there is no assessment provided as to why this occurred and whether this is an ongoing trend (although this is likely to be the trend moving forward as the CCC's 30-Year Infrastructure Strategy – page 129 states that "approximately 20% of future residential growth will be located in new greenfield developments and 80% in infill areas within the current urban limits". In addition, the city does not provide the data for greater Christchurch to show the overall level of intensification v. greenfields development that is the basis of CRPS Targets.
- Appendix 7 of this response provides an assessment of intensification v. greenfield development for Greater Christchurch on a consistent basis over 12 years. This analysis is drawn from WDC records, information supplied by SDC and from the CCC Monitoring & Research Unit. Through the CRPS Greater Christchurch targets have been in place since 2013 as follows:
    - 2013-16: average intensification rate of 35%
    - 2016-21: average intensification rate of 45%
    - 2022-28: average intensification rate of 55%
- The long run average intensification rate for the 12 year period is 26% and for the 2013-16 period result was 22%.

2.27 In summary, the assessment provided in this part of the Technical Advice and interpretation of data is inaccurate and therefore WDC recommends that no changes should be made to "Our Space".

2.28 Recommendation: That no change to Our Space is required and WDC agrees with the recommendation from the Officer's Report (page 13, 14 and 66)

3. Density

3.1 The Technical Advice proposes minimum residential densities for new Greenfield areas in Waimakariri and Selwyn should be raised through a 2019 CRPS Change by 50% immediately. WDC disagree with this proposition as unwise and impractical in the timeframes suggested by underestimating the scale of the work required and putting at risk the timely passage of the proposed 2019 CRPS Change that would frustrate and delay District Plan Reviews. It is also inconsistent with what was clearly stated through Draft Our Space documents upon which the public were entitled to rely. Reasoning for these conclusions is detailed as previously advised in the Officer's report (page 96 and 97). WDC below addresses new matters related to density raised in the Technical Advice.

3.2 Paragraph 3 page 6, quote, "Undertaking a structure planning exercise to determine average density requirements, does not provide an adequate level of certainty as to the outcome (i.e. necessary yield to meet demand).

3.3 WDC staff do not agree with this statement. The purpose of a Structure Plan is to give a clear direction and certainty to landowners, developers, the community and Council on how an area or Town will develop in the future (rather than in ad hoc manner which has occurred in developments and towns in the past). How to implement a Structure Plan is critical so that the Structure Plan and the District Plan are as integrated as possible. There are a number of good example of how this has occurred in Greater Christchurch. The Rolleston Structure Plan is one of these examples. Section 7.2.5 of the Structure Plan outlined the proposed density spread of new Greenfield areas. The plan proposed that these new residential areas could achieve up to 14 households per hectare. The areas were then refined into an Outline Development Plan (ODP) (similar to Policy 6.3.3 in the CPRS) and consultation and development of the ODP occurred between Council and landowners until they were ready to be included into the District Plan via Plan Change 7 (these ODPs contained different densities over the areas but average overall between 10-13 households per hectare depend on the location of the Greenfield area in Rolleston). Specific policies were created in the District Plan to outline the density requirements and the relevant activity status should this be breached via resource consent.

3.4 As outlined by submitters during the hearing (for example submitter 19) some flexibility and or amendments over time have been made to the ODPs to respond to the changing circumstances of the housing market, however density in Rolleston has increased and in certain key areas above the RPS target of 10 households per hectare. This did not require an amendment to the RPS to achieve this outcome, especially as this density target is a minimum. Therefore it has allowed the Council and developers to achieve higher density at a District level rather than being required to respond to a general overall number stated in a Regional level (via the CRPS).

3.5 The process used by Selwyn District Council (SDC) to implement the Rolleston Structure Plan via Plan Change 7 was recognized by the New Zealand Planning Institute (NZPI) as best practice (for District and Regional Planning) and in addition won the Nancy Northcroft Planning Practice Award in 2012. NZPI commented that:

"The scale of the Plan Change necessitated that the Council foster strong working relationships with affected landowners to achieve the best outcome for all parties. This was achieved by settling up a formal negotiation process between landowners and Council to develop Outline Development Plans that were included in the notified version of the Plan Change. The major outcomes of this Plan Change were that it became the first Council-led plan change to give effect to Plan Change 1 to the Regional Policy Statement; it rezoned some 801 ha of land in Lincoln and Rolleston to a new mixed density zone to accommodate 8,800 residential households over the next 10 to 25 years; it required to incorporation of Outline Development Plan's into the District Plan before development could occur and identified specific criteria to be addressed that would support the implementation of the key aspects of the Structure Plans; and resulted in new District-wide and Township specific provisions to implement the Council's Subdivision and Medium Density Design Guide.

The Awards Panel were impressed by the negotiation process and the comprehensive nature of the Plan Change and its direction in promoting the development of integrated and environmentally sustainable communities. The Panel considered Plan Change 7 demonstrated best practice in providing for urban growth within a District Plan and in the context of a broader strategic planning framework."

3.6 WDC propose to take the lessons learnt from SDC and develop a similar Structure Plan – District Plan Change (via the District Plan Review) process that has been recognized nationally as best practice to respond to the housing capacity issues identified in Our Space. This fully complies with the requirement of Policy PC4 of the NPS-UDC which states that:

"*A local authority shall consider all practicable options available to it to provide sufficient development capacity and enable development to meet demand in the short, medium and long term, including:*

a. *Changes to plans and regional policy statements, including to the zoning, objectives, policies, rules and overlays that apply in both existing urban environments and greenfield areas;*
b. *Integrated and coordinated consenting processes that facilitate development; and*
c. *Statutory tools and other methods available under other legislation*."

3.7 WDC is also suggesting other methods in addition to Structure Planning and District Plan Reviews to address sufficient development capacity. On page 97 of the Officer's Report, WDC suggested the follow:

- All partner TAs commit by April 2020 to complete an assessment of achieved v. CRPS targeted densities in all development areas (since CRPS Chapter 6 was made operative). This assessment will also include an evaluation of the costs and benefits of increasing densities (including the implications for urban form and character of relevant towns, and infrastructure provision, as a result of increasing densities), which will be informed by community engagement as deemed appropriate by relevant TAs and circumstances. This process will allow informed consideration of the impact of a change to density regimes and is preparatory to both District Plan Reviews and the upcoming CRPS Review.
- WDC and SDC commit to incorporate increased minimum densities through structure planning processes for Future Urban Development Areas (FUDAs) that occur over the next 12 months, in light of the above, to be subsequently identified in DPRs that are scheduled to be notified in mid-2020.

3.8 This recommended detailed approach is a comprehensive response to dealing with a shortfall in housing capacity in the medium term while still providing housing choice and considering the

impact of affordability. A number of unresolved matters arise from the approach that is recommended in the Technical Advice:

a) Are other development areas achieving targeted minimum densities and if not, how many were unable to and what were the reasons?
b) There has been no engagement in Waimakariri and Selwyn on this issue as it is these communities that are impacted on.
c) There has been no consideration of the impact of a 50% increase in densities on the character and urban form of Districts township or existing Waimakariri and Selwyn Council strategies (such as Infrastructure Strategies and development of Structure Plans for townships in Waimakariri and Selwyn)
d) How does this proposed action support the objectives of the GCP through its planning documents and align with the NPS-UDC in providing for a wide variety of housing types by location and price point?

3.9 It is important to stress that Waimakariri District Council are committed to enabling the housing market to be flexible enough to be able to develop houses that address the changing needs of their communities of the next thirty years. This Council is currently in the process of District Plan Reviews and either reviewing or development new Structure Plans for townships within the district. These processes will provide significant evidence which could be used as part of the 2022 CPRS Review to make any suitable changes to the minimum density targets. These processes provide the opportunity to build the evidence base and provide the community of Waimakariri the opportunity to engage of this issue. It is recommend that consideration of any change to be made to the CRPS density policy should be included as part of the 2022 CRPS Review.

3.10 Page 7, Paragraph 1 of the Technical Advice suggests "Continuing to develop Selwyn and Waimakariri at low densities will be less efficient for public transport (thus encourage more car use and traffic congestion downstream). Table 1 below sets out the densities that should be provided to support public transport. Whilst prepared in 1989, Greater Wellington have made reference to it in their current public transport study. Intermediate buses rather than local buses service Selwyn and Waimakariri, therefore based on Table 1, greenfield areas should be aiming at achieving 17hh/ha, not 10hh/ha, to better support public transport.

Table 1: *Transit Supportive Residential Density Thresholds*	
Public Transport Service	Density threshold (dwellings/hectare)
Local bus (60 Minute frequency)	10
Intermediate bus (30 Minute frequency)	17
Frequent bus (10 Minute frequency)	37

3.11 WDC has checked the "Metroinfo" website to consider existing Public Transport services in Rangiora and Kaiapoi and how often they occur during the day. This confirms that the "Route B Rangiora and Belfast to Princess Margaret Hospital" currently leaves Rangiora every half an hour between the hours of 7.40 am to 6.44pm. Between the hours of 7.44pm to 10.44pm in turns into an every hour service. In addition there is express services that leaves Rangiora every 10 minutes

between 6.40 am and 7.20am. The bus trip from Rangiora to the Business Interchange takes on average approximately an hour and eight minutes. The existing bus service does not seem to align with the thirty year old American study referenced above.

3.12 Page 7, paragraph3, of the Technical Advice reads: "To illustrate the importance of housing densities (and policies directing them) as a mechanism to achieve urban consolidation objectives, a desktop analysis has been undertaken to illustrate a hypothetical outcome if delivered through low density development. Appendix C (i.e. The Map) illustrates two scenarios, first what additional rural land would have been required if the GPAs were only developed at 10hh/ha and suggests this equating to an additional 200ha of rural land (i.e. approximately two additional ODP areas). Secondly, that if no intensification had been enabled through redevelopment of its existing urban area, then again how much additional rural land, this being suggested as 5,000ha, would have been required. Strategic documents such as Our Space are vitally important to set the policy direction today, such to ensure opportunities are not lost in delivering the most efficient and appropriate use of the land resource. Greenfield areas, being essentially a blank slate, if designed well, have great potential in meeting future needs".

3.13 WDC considers that Appendix C in the Technical Advice is unrealistic for the following reasons:

- No data is provided to support the assessment for additional 200ha of rural land required if developing at 10hh/ha or the example using 5,000 ha.
- The assumption that no intensification in the city could or would occur, which clearly it is and will continue to create a misleading hypothetical example which is not relevant to the consideration of densities.

3.14 Recommendation: that the following actions being included in actions 9 in 'Our Space':

- **All partner TAs by April 2020 complete an assessment of achieved v. CRPS targeted densities in all development areas (since CRPS Chapter 6 was made operative). This assessment will also include an evaluation of the costs and benefits of realizing higher targeted densities (including the implications for urban form and character of relevant towns, and infrastructure provision, as a result of increasing densities), which will be informed by community engagement by relevant TAs and circumstances. This process will allow informed consideration of the impact of a change to density regimes and is preparatory to both District Plan Reviews and the upcoming CRPS Review.**
- **WDC and SDC to incorporate increased minimum densities through Future Urban Development Areas (as shown in 'Our Space') structure planning processes that occur over the next 12 months, in light of the above; to be subsequently identified in District Plan Reviews that are scheduled to be notified in mid-2020.**

4. Sequencing

4.1 The Technical Advice identifies two issues in regards to sequencing in Our Space and suggests a resolution of using maximum targets as a way forward to address this concern. WDC makes the follow comments on these two issues and the use of maximum targets.

4.2 In regards to 'transport sequencing', while the development of a transport model by the Partnership is mentioned on page 10, there is currently no relevant results from the model that

might suggest impacts of sufficient scale to justify the need for 'micro' sequencing as suggested and, if there was, how such a trigger could be developed. Further, the small area data in the advice put forward from the Census is outdated and does not consider the following points:

- the data from Statistics NZ (Table 2) suggests that the increase in commuters from Waimakariri towns into the City between 2006-2013 is only 1,305 or on annual increase of 186 over the seven years. Using the data provided by the Technical Advice, this does not seem to be a significant impact on the transport network of Greater Christchurch which would require any type of sequencing.
- the data only looks at the township as a whole and does not consider the route taking by residents within that township and where exactly they travel to within the City for their place of employment. The overall pattern for this, based on latest available data is shown in Appendix 8 of this response, indicating a very diverse commuting pattern.
- the data does not consider at the same time the increase/decrease in traffic volumes within the overall traffic network of the City (population increase/decrease as result of the earthquakes).

4.3 The Technical Advice also states that without sequencing redevelopment of the Central City could be a concern. A report developed by JLL on behalf of the Property Council of New Zealand has been selectively quoted in the Technical Advice. Other conclusions of the JLL Report not quoted in the Technical Advice for example, in regard to competition from Waimakariri and Selwyn Districts on the CBD, are that:

"Like suburban residential (Christchurch), competition from the Waimakariri and Selwyn Districts was also considered a barrier to development in the CBD, although to a lesser extent.

People buying in Rolleston, Lincoln or Rangiora in most cases aren't the same people who would buy a CBD apartment or townhouse. Even if the products are at similar price levels, the end user generally has different needs/wants – namely space for a family. The greenfield subdivisions in Waimakariri and Selwyn tend to cater to the bulk of demand which is targeted at the ¾ bedroom, 2 bedroom double car internal access garage on 450-600 square metres of land. Once people are out at these locations, it's hard to get them back into the CBD, particularly from places like Rolleston where there is excellent amenity, community facilities (new swimming pool and school) and employment hubs like I-Zone.

Roading upgrades have also played a part in making it easier to live in the satellite townships and therefore there is less compulsion to live in the CBD. Between the Southern Motorway Stage 2, Western Corridor upgrade, Western Belfast Bypass, and Northern Corridor it is only going to get even easier to commute between the three TA's. By comparison, congestion is a major issue in Auckland, Willington and their adjoining districts and is a key reason why people choose to live in the CBD.

Despite these factors, it was reinforced by respondents that the focus should not be on converting families into CBD dwellers, rather the focus should be on groups who actually want to live in the CBD and working to provide the product, amenity, and lifestyle that will incentivise their decision making.

4.4 The Technical Evidence quotes from page 16 of the JLL, which states a solution is to "strictly limit the consenting of high density residential in greenfield subdivisions". The full quote from this section of the JLL report states:

"A barrier raised was the allowance of relatively high density residential pockets within Greenfield subdivisions. Prime examples include Prestons and Wigram Skies which have rows of terraced houses in their core areas that are similar in size, quality and price point to CBD options.

The solution put forward is that this type of use should be concentrated within the CBD and the high density suburbs surrounding the CBD rather than outlying suburban locations. This would involve reconsider minimum section and dwelling size in future subdivision consents."

4.5 This appears to contradict the position on the Technical Advice regarding increasing minimum density in new Greenfield areas throughout Greater Christchurch. It is therefore unclear to WDC what is being sought by the submission.

4.6 Finally the Technical Advice suggests that to address these concerns, maximum targets should be used (similar to Plan Change 1 to the Regional Policy Statement). The NPS-UDC (especially PC5 to PC11) clearly refers only to minimum targets and in order to be NPS-UDC compliant, these need to be referred to as minimum targets. In addition, all high growth Regional or Unitary Councils (Auckland, Bay of Plenty Regional Council or Waikato Regional Council) have already included minimum housing targets which complies with PC5 of the NPS-UDC. Suggesting that these targets should be maximum would be contrary to the intent and letter of the NPS-UDC.

4.7 Recommendation: No Change to 'Our Space' with regard to Sequencing

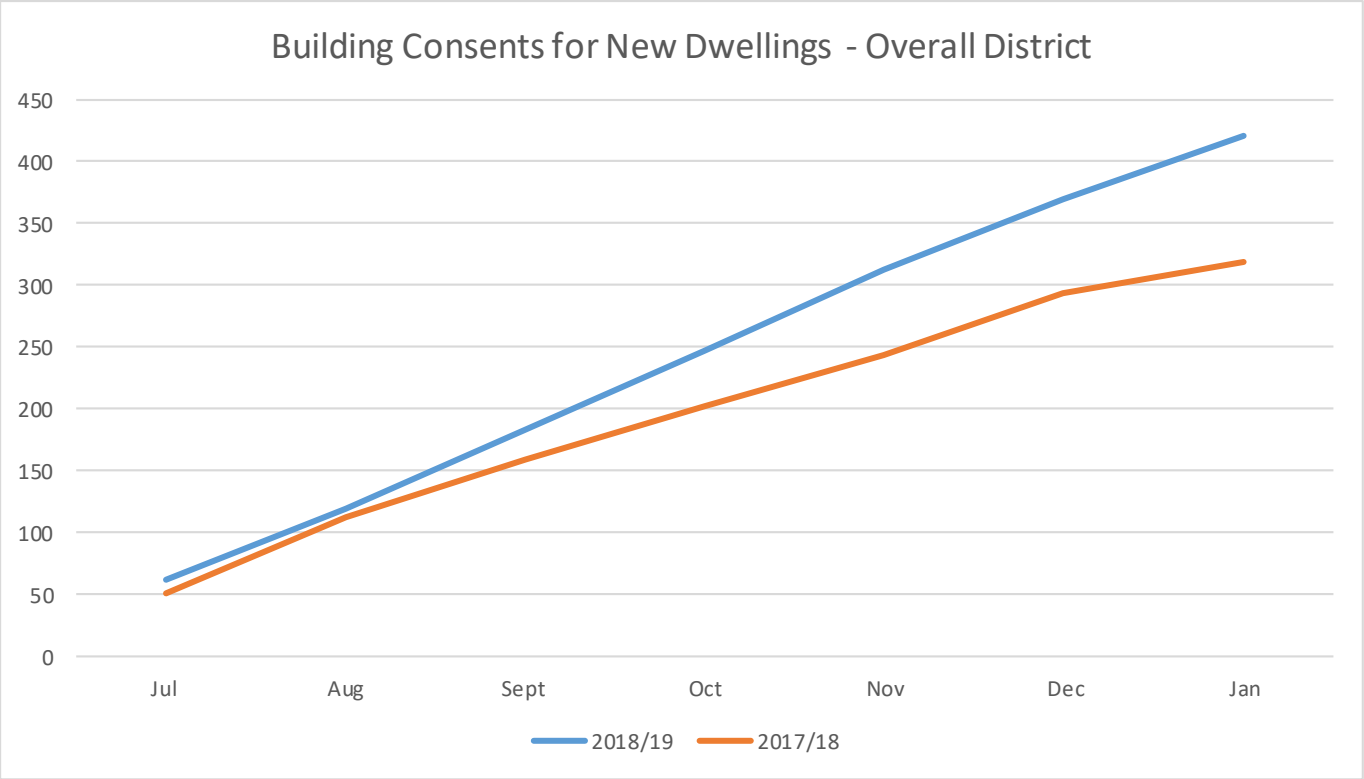
Advice Prepared by: Cameron Wood

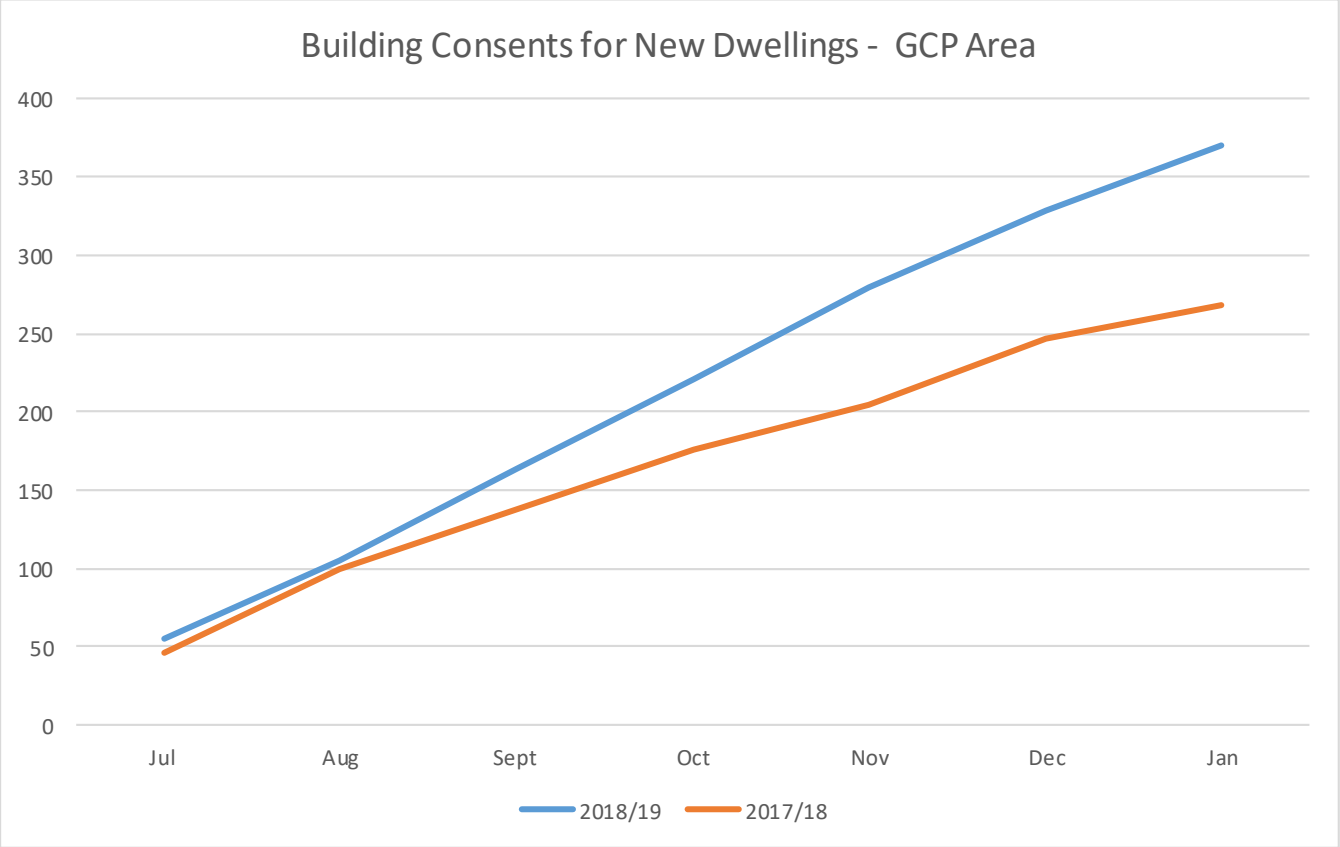
Cameron Wood qualification is a Bachelor of Economics. He has 18 years' experience in Central and Local Government. For the last 11 years he has been employed in a Strategic Planning role for both Selwyn and Waimakariri District Councils. During this time he has been involved in a number of GCP projects included Plan Change 1 to the Regional Policy Statement, Land Use Recovery Plan and NPS-UDC development and has been a member of the Senior Management Group for GCP. He was a member of the Technical Advisory Group which supported MFE/MBIE in developing guidance for the Housing and Business Capacity Assessment. In addition to this work, he led the development of the Rolleston Structure Plan, Rolleston Town Centre Masterplan, and Selwyn 2031: District Development Strategy and has been involved in the development of Waimakariri 2048: District Development Strategy. He also prepared the population model for GCP which have been used in the Housing and Business Capacity Assessment and Our Space and population models for both Selwyn and Waimakariri District Council which have been used in their Long Term Plans and 30 year Infrastructure Strategies.

Advice Reviewed by: Simon Markham

Among Simon's qualifications is a Bachelor in Town Planning. He has 30 years' experience in monitoring, analyzing, modelling and reporting urban change as a practicing planner/planning manager in private practice, for Auckland City, Christchurch City and Waimakariri District Councils. He was a contributing author of the 2007 Urban Development Strategy, prepared the PC1 Growth Model and provided demographic evidence for same. While not a current member of NZPI he is subject to codes of ethics as a member of the NZ Society of Local Government Managers, the International City/County Managers Association, the NZ Institute of Management and the NZ Institute of Directors.

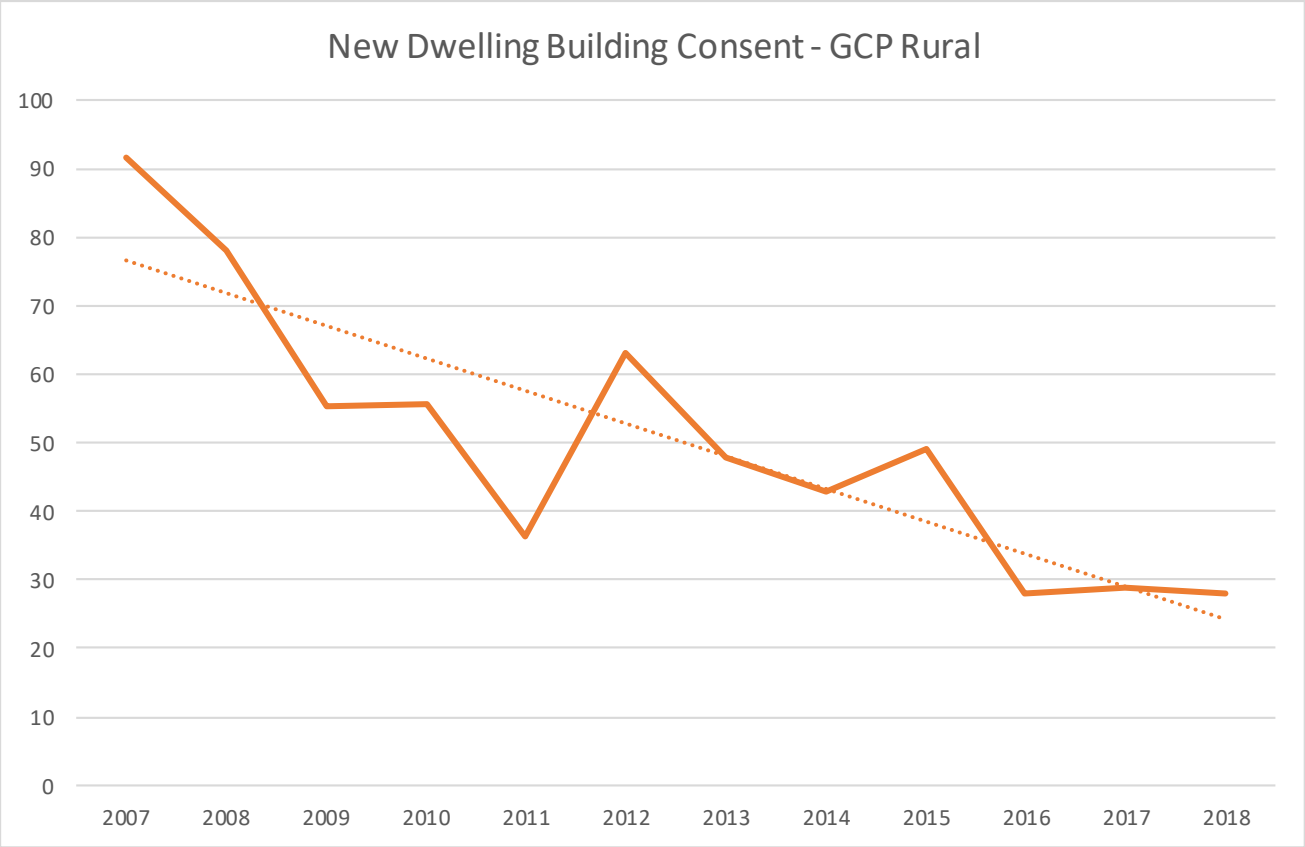
Appendix 1 – Building Consent Data for Waimakariri District

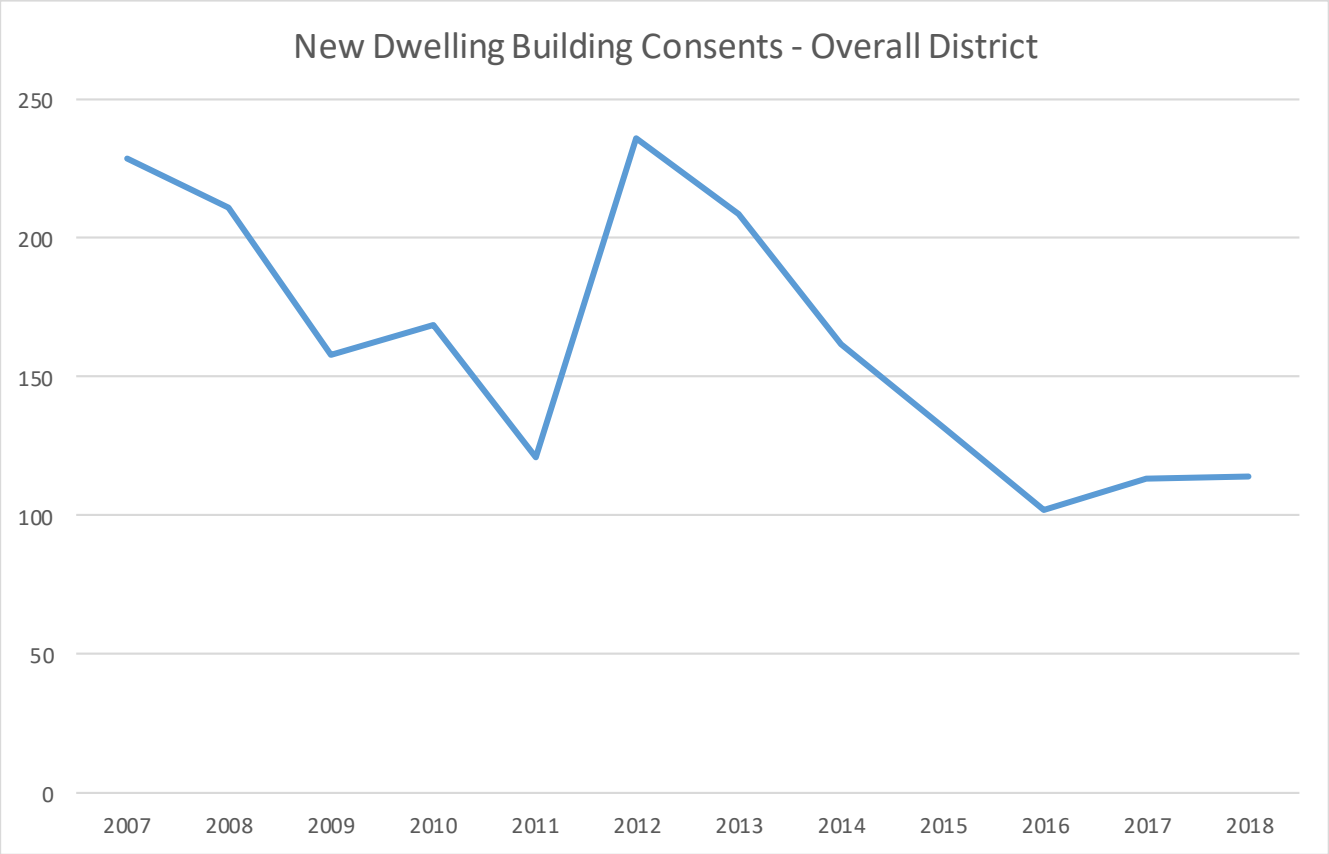




Source data: Waimakariri District Council Building Consent data for Kaiapoi, Rangiora, Woodend, Small Town /Beach Settlements, Pegasus and 30% of Rural

Appendix 2 – Building Consents in the Waimakariri District Rural Area





Source data: Waimakariri District Council Building Consent data

Appendix 3: Subnational Population Estimates for Waimakariri District

Year at 30 June	1996	2001	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Sex	Total people, sex														
Area															
Rangiora	10100	11200	12500	12850	13200	13350	13500	14100	14950	15700	16500	17000	17400	18100	18400
Kaiapoi	8530	9830	10900	11050	11150	11200	11250	10600	9920	9890	10350	10750	11000	11300	11850
Woodend	1640	2360	2740	2750	2740	2740	2730	2760	2770	2850	2930	2950	3030	3070	3100
Pegasus	30	20	20	20	20	80	200	610	880	1080	1280	1580	1730	1870	2080
Mandeville	910	1430	1950	2030	2140	2240	2310	2540	2600	2770	2890	3160	3240	3290	3350
Ohoka	640	770	980	1010	1030	1030	1020	1090	1110	1190	1230	1230	1270	1280	1300
Total Urban	**21850**	**25610**	**29090**	**29710**	**30280**	**30640**	**31010**	**31700**	**32230**	**33480**	**35180**	**36670**	**37670**	**38910**	**40080**
Total Rural	**4540**	**4820**	**5770**	**5860**	**5950**	**6160**	**6260**	**6560**	**6610**	**6620**	**6780**	**6960**	**7120**	**7150**	**7220**
TOTAL - GCP Area	**26390**	**30430**	**34860**	**35570**	**36230**	**36800**	**37270**	**38260**	**38840**	**40100**	**41960**	**43630**	**44790**	**46060**	**47300**
% Urban	83%	84%	83%	84%	84%	83%	83%	83%	83%	83%	84%	84%	84%	84%	85%
% Rural	17%	16%	17%	16%	16%	17%	17%	17%	17%	17%	16%	16%	16%	16%	15%
Urban Growth		3760	3480	620	570	360	370	690	530	1250	1700	1490	1000	1240	1170
Rural Growth		280	950	90	90	210	100	300	50	10	160	180	160	30	70
TOTAL		4040	4430	710	660	570	470	990	580	1260	1860	1670	1160	1270	1240
% Growth Urban		93%	79%	87%	86%	63%	79%	70%	91%	99%	91%	89%	86%	98%	94%
% Growth Rural		7%	21%	13%	14%	37%	21%	30%	9%	1%	9%	11%	14%	2%	6%
Rural Additional Households		108	365	35	35	81	38	115	19	4	62	69	62	12	27

Total Additional Rural Households	2008-2017	496
Total Additional Rural Households	2009-2018	488

Source Statistics New Zealand

Appendix 4

Data from QV - Vacant Lifestyle Properties Improved with Dwelling – Waimakariri District GCP Area

		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
4-7.99 Ha		80	56	85	82	65	49	43	38	29	35	46	29	20
8-19.99 Ha		2	0	2	1	1	0	1	2	0	4	2	0	1
20 Ha +		1	0	0	0	0	0	1	0	0	0	0	0	0
Total		83	56	87	83	66	49	45	40	29	39	48	29	21
GCP Average 2009-2018		45												
GCP Average 2008-2017		52												

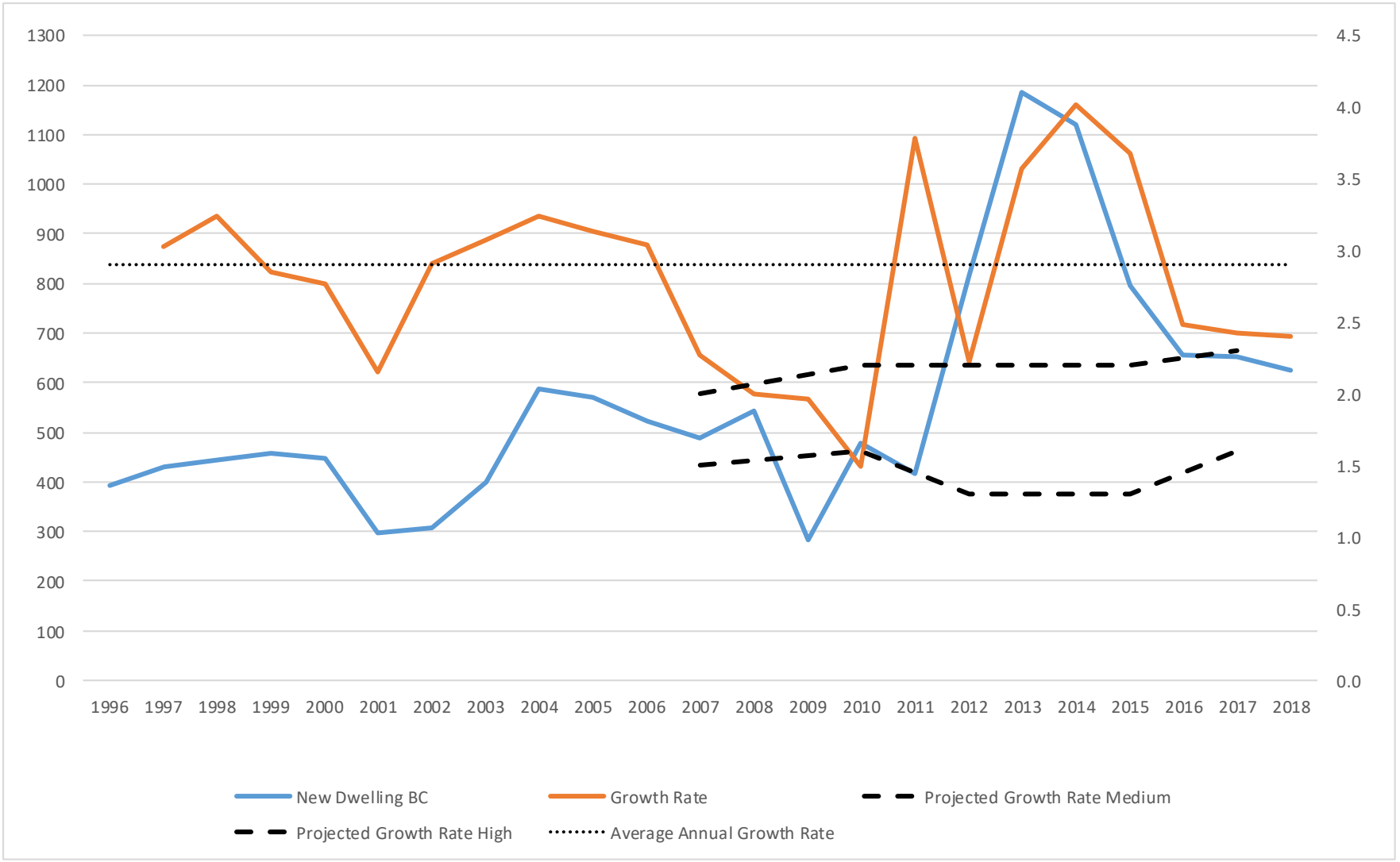
Waimakariri District Building Consents Data – Rural Area

			2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
GCP Area			*92*	*78*	*55*	*56*	*36*	63	48	43	49	28	29	28
Rest of the District			*137*	*133*	*103*	*113*	*85*	173	161	119	83	74	84	86
Total			229	211	158	169	121	236	209	162	132	102	113	114

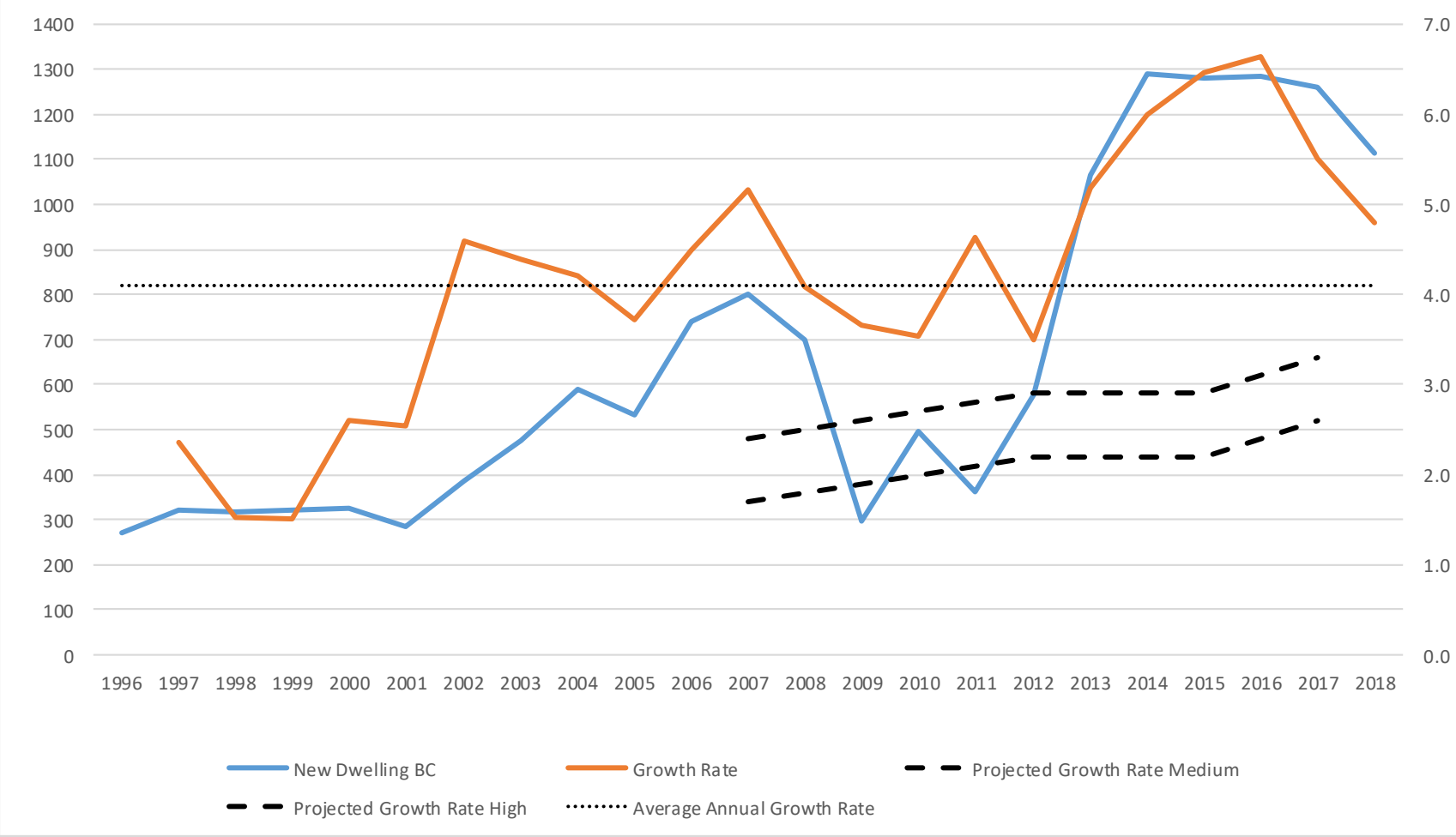
GCP Average 2009-2018 44
GCP Average 2008-2017 49

Appendix 5 (LH axis is New Dwelling Consents; RH axis is Annual % Population Change)

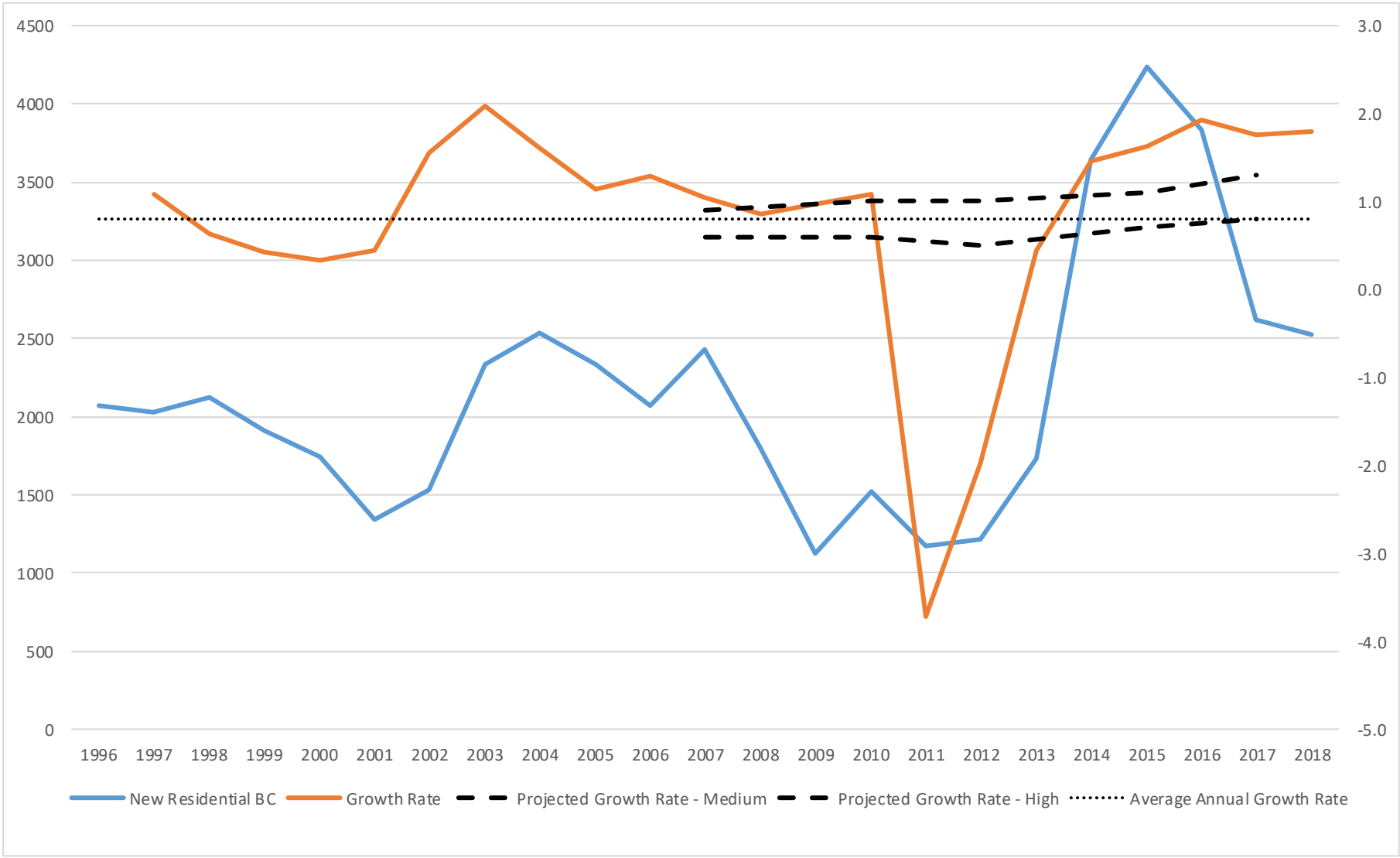
Waimakariri District



Selwyn District



Christchurch City

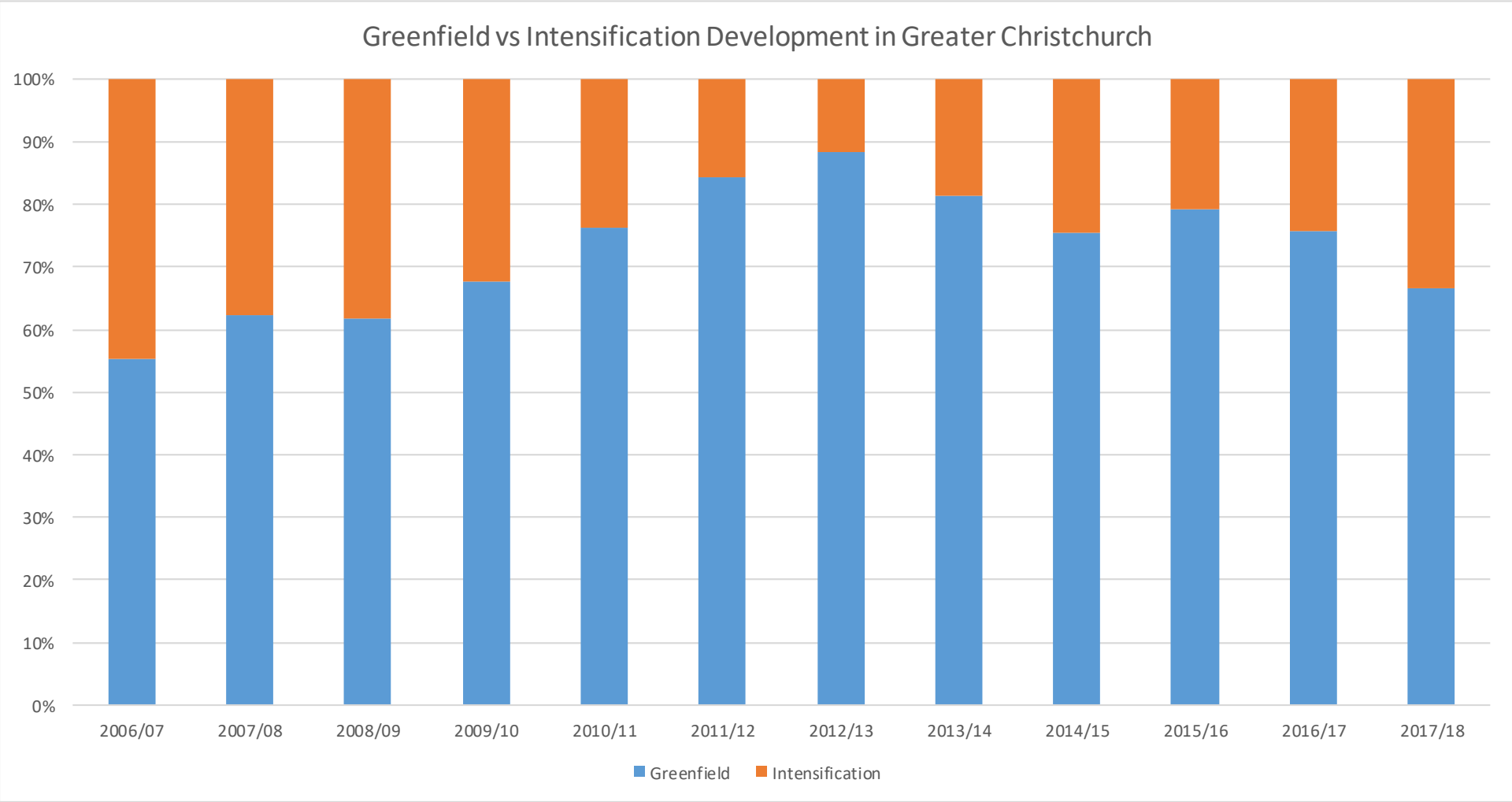


Appendix 6: Population of Statistical Areas Comprising the Christchurch CBD and an Area in Selwyn District

Year at 30 June		2017	2018	Total Change	Percentage Change
Area					
324900 Hagley Park	CBD	130	130	0	
325700 Christchurch Central-West	CBD	1020	1050	30	3%
325800 Christchurch Central-North	CBD	2230	2320	90	4%
326600 Christchurch Central	CBD	30	30	0	0%
327000 Christchurch Central-East	CBD	1780	1960	180	10%
327100 Christchurch Central-South	CBD	670	680	10	1%
335500 Rolleston South East	Rolleston	1820	2490	670	37%

Stats NZ: Dataset: Subnational population estimates (RC, SA2), by age and sex, at 30 June 1996, 2001, 2006-18 (2018 boundaries)

Appendix 7: Net New Dwelling % Shares for Greenfield and Intensification Areas for Greater Christchurch, 2007-18



Source data: Greater Christchurch Councils (Selwyn, Waimakariri and Christchurch City)

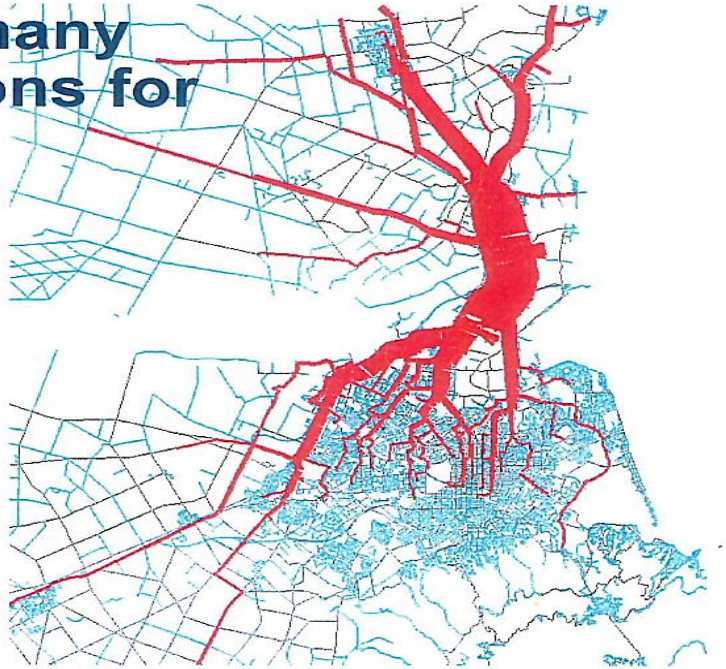
Appendix 8: Commuter Travel Patterns from Waimakariri to Christchurch

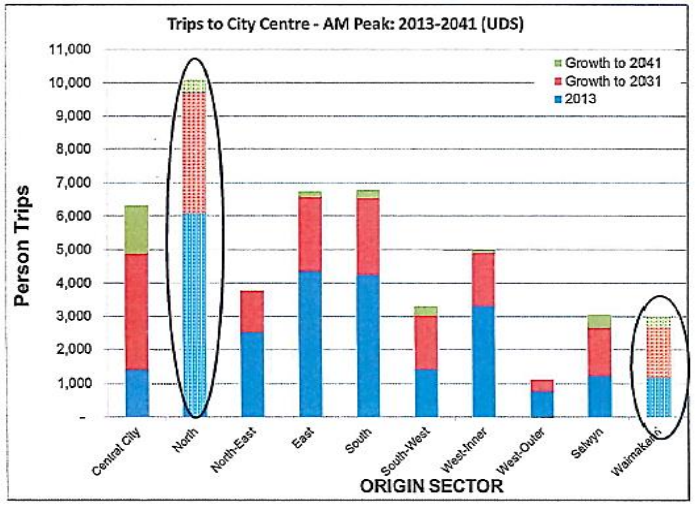
Source of Graphic: NZ Transport Agency

Waimakariri Bridge is used by many people going to many destinations for many reasons

PBC Problems:

- **Unreliable travel time**
- **Safety**
- **Accessibility(Woodend)**





Around 20% of AM peak person trips to City Centre are from North and 10% from Waimakariri