

Submission Form



**Greater Christchurch
Partnership**

Te Tira Tū Tahī
One Group, Standing Together

HAVE YOUR SAY BY 30 NOVEMBER 2018

OUR SPACE 2018-2048

Greater Christchurch Settlement Pattern Update
Whakahāngai O Te Hōrapa Nohoanga

How to make a submission

Online: Make a submission using the online submission form at www.greaterchristchurch.org.nz/ourspace

Email: ourspace@greaterchristchurch.org.nz

Post: Our Space consultation, Greater Christchurch Partnership, PO Box 73012, Christchurch 8154

Hand deliver: Civic Offices, 53 Hereford Street

SUBMITTER DETAILS

Name: Scarborough Hill Properties Ltd (Ruth Kendall & Ewan Carr)
 Address: C/- Adderley Head
15 Worcester Boulevard, Christchurch
Attention: Juliette Derry
 Email: juliette.derry@adderleyhead.co.nz

I am completing this submission: For myself On behalf of a group or organisation

If you are representing a group or organisation, how many people do you represent? _____

HEARINGS

Hearings are planned for February 2019.

Do you wish to speak to the hearings panel?

Yes, I wish to speak at the hearings No, I do not wish to speak at the hearings

If you wish to speak at the hearings, please indicate your preferred location to be heard and provide a contact number.

Preferred location: Christchurch City Rangiora Rolleston

Contact number: _____

Submission Attached!



**ADDERLEY
HEAD**

ENVIRONMENTAL LAW SPECIALISTS

**SUBMISSION ON DRAFT OUR SPACE 2018-2048 GREATER
CHRISTCHURCH SETTLEMENT PATTERN UPDATE**

To: **Our SPACE Consultation**
Greater Christchurch Partnership
PO Box 73012
Christchurch 8154

Submitter: **SCARBOROUGH HILL PROPERTIES LIMITED**

C/- Adderley Head,
Attention: Juliette Derry

Proposal: Our SPACE 2018-2048 Greater Christchurch Settlement Pattern
Update – November 2018

**Submission on the
'Our SPACE 2018-2048 Greater Christchurch Settlement Pattern Update'**

Name of submitter and background

- 1 This submission has been prepared on behalf of Scarborough Hill Properties Limited (**SHPL**) and its Directors and Shareholders Ms Ruth Kendall & Mr Ewan Carr.
- 2 SHPL owns a property at 60 Godley Drive, Scarborough, Christchurch (the 'Property').
- 3 The Property falls partly within the Rural Port Hills Zone under the Christchurch District Plan and is located outside and immediately adjacent to the boundary of the existing urban area for Christchurch (identified on Map A – Greenfield Priority Areas ('Map A') of the Canterbury Regional Policy Statement 2013 ('CRPS')). The Property also shares a boundary to the south with the CCC Recreational Farm Park.
- 4 The Property is approximately 27 hectares in size. The Property is zoned in part residential and also has resource consent to develop pockets of the Property for residential use. It is intended to further develop the Property in the future.

Introduction

- 5 The draft Our SPACE 2018-2048 Greater Christchurch Settlement Pattern Update (the 'Update') has been created for the purpose of meeting the requirements of the National Policy Statement on Urban Development Capacity 2016 ('NPS'), to produce a future development strategy and to demonstrate sufficient, feasible development capacity in the medium and long term for greater Christchurch.
- 6 SHPL is particularly interested in the preferred locations for housing growth identified in the Update in relation to Christchurch city.

Detail of submission

- 7 The Update is a foundation document which will be implemented through resource management planning processes, into the CPRS and the greater Christchurch district plans (Christchurch, Selwyn, Waimakariri).
- 8 While the Update is not a formal (legal) planning document, it plays a key role in supporting and setting planning directions which are implemented or given effect to through the provisions of the CPRS and district plans.
- 9 The Update anticipates a return to stronger levels of demand for higher density housing in Christchurch city and recognises and supports opportunities to redevelop and intensify existing urban areas in Christchurch city to meet housing needs.

- 10 As such the Update is aligned with CRPS and Christchurch District Plan in terms of the locations for future residential development opportunities to occur.
- 11 SHPL is a landowner that has aspirations to develop its Property located on the boundary external to the existing urban boundary.
- 12 SHPL is concerned that the Update builds on and supports the inflexible approach contained in the CPRS and Christchurch District Plan in relation to urban residential development occurring within the existing urban areas and greenfield priority areas.
- 13 SHPL is concerned that the Update does not provide adequate recognition of potential issues which give rise to uncertainty in respect of whether the opportunities available for residential redevelopment and intensification within Christchurch City will be realised over time. In particular;
- (a) The key issues outlined in the Capacity Assessment which supports the Update (Housing and Business Development Capacity Assessment 2018-2048) include the following issue;
- “the current and future commercial feasibility of providing housing (standalone houses, townhouses and apartments) in locations identified in district plans is uncertain, especially in areas of the City where redevelopment of sites to provide medium and higher density housing is envisaged”.
- (b) The Update relies on a shifting demographic and a growing market demand for high density, smaller housing types such as apartments and townhouses. However, with changing population growth and demographics there is necessary uncertainty in relation to this identified market demand, particularly in the context of a 30 year time frame.
- 14 In contrast SHPL is an owner of land, immediately on the boundary of existing urban land, committed to redeveloping its land to accommodate housing need. As such, this Property provides greater certainty than the other locations. Accordingly, notwithstanding that SHPL’s land is outside the existing urban boundary, it potentially presents a greater prospect for accommodating housing growth compared with other land in Christchurch city in identified preferred locations.
- 15 Further, SHPL’s land is ideally suited to a significantly less intensive form of housing development to that anticipated and supported by the Update and as such provides scope to cater for a wider range of future housing needs/demand.
- 16 The Update allows for some flexibility, in applying margins of feasible development capacity over and above projected demand, to allow for situations when developments are not

bought to the market. However the potential for development supported by the Update is primarily focused on intensification of existing urban areas.

- 17 SHPL is concerned that the Update lacks the flexibility to adequately accommodate all needs and/or future market changes.
- 18 Further to the above, SHPL considers that the Update, should allow for a more flexible approach to accommodate change, particularly in respect of property owner (or developer) intention and market demand, and consequently allow for consideration of urban residential development occurring in appropriate locations outside of the existing urban boundary and identified greenfield priority areas.
- 19 Accordingly, SHPL contends that consideration should be given within the Update to the potential for housing needs to be accommodated over time outside the existing urban area boundary (where appropriate). This would provide greater flexibility and would better reflect the flexible nature intended for future development strategies by the NPS. In particular, the NPS guideline provides that future development strategies should be *"...flexible enough to respond to change, for example, in demand or landowner intentions."*¹

Amendment Sought

- 20 SHPL requests the Update be amended to include an additional sentence, in the table on page 21 which describes what urban growth will look like in different areas of Christchurch City. In particular, SPHL requests the following sentence be included immediately before the final sentence in the description of the "Suburbs and Outer Urban Areas":

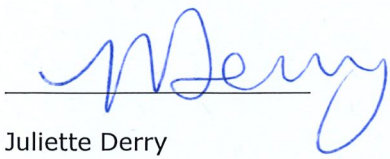
Residential zones elsewhere are reviewed and expanded into locations where residential activity is commercially viable, offers greater efficiencies in resource use, and can achieve high standards of liveability.

Conclusion

- 21 For the reasons outlined above, SHPL seeks that the Update be amended to acknowledge that other land, outside of the existing urban boundary and greenfield priority areas, might also be suitable for development to accommodate housing growth.
- 22 SHPL wishes to be heard in support of this submission at the hearings planned for February 2019.

Dated 30 November 2018

¹ Ministry for the Environment and Ministry of Business, Innovation and Employment – 'Introductory Guide to the National Policy Statement on Urban Development Capacity 2016' p28



Juliette Derry

For an on behalf of Scarborough Hill Properties Limited

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