

30 November 2018

Our SPACE Consultation
Greater Christchurch Partnership
PO Box 73012
Christchurch 8154

Dear Sir / Madam,

Re: Draft Our Space 2018-2048 Greater Christchurch Settlement Pattern Update

This is a submission on Our Space 2018-2048 Greater Christchurch Settlement Pattern Update ('Our Space') on behalf of the staff of the Council, which also reflects the views of the City's Community Boards that have been expressed to staff.

Overview

Christchurch City Council supports Our Space being released for public consultation, and the partnership approach taken to develop it. Our Space broadly supports the Council's Strategic Priorities of:

- Creating a vibrant, prosperous and sustainable 21st century city;
- Increasing active, public and shared transport opportunities;
- Taking a lead on climate change; and
- Enabling active citizenship and connected communities.
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The Council supports the collaborative approach that has been taken by the Greater Christchurch Partnership (GCP) and the fusing of the legislative requirements to produce a future development strategy as outlined in the National Policy Statement on Urban Development Capacity (NPS-UDC) with a review of the land use planning framework for Greater Christchurch, which has been previously developed as the Greater Christchurch Urban Development Strategy (UDS).

Why the Council is submitting

As a partner in the GCP Christchurch City Council has worked collaboratively for over a decade on planning and managing urban growth and development in Greater Christchurch. The relationship with our partners has been fundamentally important to the Council's work, and the strength and value of the Partnership has been evident in a period that has witnessed unprecedented change and challenges in the City.

Going forward, the concluding of the City's regeneration and the move towards firmly establishing Christchurch as New Zealand's second city will be achieved through a combination of maintaining the strong relationship with our partners, and ensuring the Council fulfils its core role as enabler of the City's Vision of Christchurch being a City of opportunity for all. The Council believes that the fulfilment of this Vision represents the optimal long-term strategy not only for the City, but also for Greater Christchurch. Achieving this Vision, and the Strategic Priorities which underpin it, thus does require a specific focus on the City, notably the Central City. No successful and sustainable urban area exists without a strong core.

Whilst Our Space recognises and supports the focus on the Central City, and the Council acknowledges the support of the GCP in this respect, the Council considers there are opportunities for Our Space to go further in its advocacy for the City than it does at present. These views have also been reflected in the Council's

consultation with Community Boards across the City. The Council considers that a balanced debate on the content of Our Space should give greater consideration to these opportunities.

Most of these views of Council have been expressed to our partners during the preparation of Our Space, and in part informed the production of the Greater Christchurch Settlement Pattern Update – Options Assessment Report, a public document which supports Our Space. Beyond the Options Assessment Report, the Council still considers that existing and emerging evidence is giving rise to potential options of which Our Space can, and should, take account. The Council also notes some matters in the Update that appear contradictory or unclear, and on which clarification needs to be sought.

Thus, to ensure all pertinent matters are made publicly available at this draft Update stage; to ensure the views of Council staff and the Community Boards¹ of Christchurch are aligned in one document for administrative efficiency; and to ensure all matters can be given due consideration by the Hearings Panel to be established and held in early 2019, the Council has lodged this submission.

Matters for Consideration

- **Inconsistencies in the draft Update**
The Council notes that there is a misalignment between the figures used for housing capacity over the medium term and the need for intervention. This is particularly notable for the Selwyn District Council figures provided in Table 3 (page 13) of Our Space. Table 3 indicates sufficient supply over the medium term yet Our Space repeatedly refers to a 'potential shortfall in capacity'. From the facts presented in Our Space there is no shortfall over the medium term in Selwyn, and thus very little evidence for intervention via the additional zoning of greenfield land;
- **Updating proposed policy interventions to reflect emerging data**
Through receipt and publication of significant updates to Waimakariri and Selwyn District Council housing sufficiency figures in October 2018 (which will be used to inform subsequent changes to Our Space), the GCP has acknowledged the ongoing dynamic nature of evidence base building inherent in the Our Space process. Given this approach, the Council notes the most recent consenting data and population estimates suggest an ability for the City to provide for a greater proportion of demand, and thus is seeking for this evidence to form part of the ongoing iterative process. In the medium term (2018-2028) demand will be apportioned between the districts based on the projections, i.e. Option C in Our Space. This results in 53% of the new houses in Christchurch City over the next ten years, and the remaining 47% of new houses in the surrounding districts. Beyond 2028 demand is apportioned as per the targets in the UDS that 70% of new households in Greater Christchurch will be in Christchurch City. Current statistics indicate approximately 60% of households are being built in Christchurch City, suggesting that the hybrid approach may be under-estimating the City's ability to meet growth demands;

¹ This staff submission has been prepared without the direct input of Christchurch City Council's elected members, having been authorised through the delegations available to the Council's Chief Executive. Elected members retain the ultimate rights of determination on the Council's decision to adopt or reject Our Space after the document has been assessed by the Hearings Panel. Elected members can and have inputted indirectly as members of Community Boards that have provided inputs to this submission. To ensure Council's proposed representative on the Greater Christchurch Partnership's Hearing Panel (Councillor Sara Templeton) has clear separation from the content of this submission for the purposes of transparency, Cllr Templeton has not been involved in any Community Board inputs to this submission.

- Sequencing of development
The NPS-UDC anticipates that there will be sequencing, with Policy PC13 stating: The future development strategy shall: a) identify the broad location, timing and sequencing of future development capacity over the long term in future urban environments and intensification opportunities within existing urban environments. The Council considers Our Space does not fully sequence development to ensure the efficient use of infrastructure. The housing targets in the document give an indication of the amount of additional development in each time period. The purpose of this is stated as: ‘...represent the development capacity that each council will seek to enable through their relevant planning processes and mechanisms’ (Our Space, page 12). However these targets are minimums and does not prevent additional development capacity being provided in excess of the targets. If additional development capacity is provided this could have the effect of reapportioning where growth occurs and could potentially mean that demand exceeds the infrastructure capacity that is being planned for, and reduces the efficient use of infrastructure;
- Intensification in townships and increase densities in greenfield areas and FUDAs
The Council’s engagement with Community Boards regarding Our Space has indicated a broad level of support for intensification of Greater Christchurch’s urban areas, noting that greater densities – achieved through seeking a range of housing types around key centres – can increase accessibility to employment and services by walking, cycling and public transport that aligns with recent transport proposals that signal more high frequency bus routes and an intention to deliver rapid transit along the northern and south-west transport corridors. The city’s neighbourhoods are intensifying with some areas exceeding the housing density targets set under the Canterbury Regional Policy Statement. Ensuring quality builds and neighbourhood amenity with this urban change, together with providing better opportunities for community engagement in development processes, is an ongoing priority for the Council. Whilst it is the Council’s view that matters of building quality and neighbourhood amenity are appropriately dealt with within District Plans, it considers a strong and consistent direction on minimum density yields is required at the regional level and certainly within Greater Christchurch given the close proximity of its urban areas. More specifically, the communities of Christchurch have indicated they can see no clear justification for development in the Districts being set at 10 households per hectare, when nothing more substantive than an administrative boundary dictating a significantly different rate of 15 households per hectare in the City.

In response to the above, the Council is seeking to ensure the opportunity offered by the NPS-UDC to develop a co-ordinated strategic approach to sub-regional growth is fulfilled. At present the Council holds the view that an over-reliance on subsequent planning mechanisms for achieving objectives would constitute a failure to seize this opportunity. Notably, the Council considers the reliance on local planning instruments (e.g. District Plan Reviews) to achieve matters of a strategic nature (such as intensification targets) is a fundamentally flawed approach. Christchurch City Council has implemented challenging targets for intensification of existing and future growth areas, and is presently working with local communities and the development community to address the matters arising from these processes. The Council considers that, in the interests of sustainable land use and transport planning, and in terms of engaging Greater Christchurch communities in a fair and coherent manner, stronger strategic direction is needed in Our Space to catalyse an immediate review of intensification and an increase in densities for greenfield and future urban development areas (FUDAs) in Waimakariri and Selwyn;

- **Factoring in rural capacity**
The Council notes there is a risk the housing shortfall figures for Waimakariri and Selwyn may be being artificially inflated because rural demand but not rural supply was included in the sufficiency figures. The Council had sought this be noted in Our Space, as it was in earlier iterations, however the consultation draft does not specifically mention this matter. In terms of ensuring maximum accuracy in the housing sufficiency figures the Council considers further investigation is required prior to the progression of a finalised version of Our Space;
- **Reviewing business sufficiency**
The Council notes the business capacity assessment calculations in Our Space have not been updated to take account of the agreed use of the 'hybrid' policy intervention, even in its current single option form (hybrid initiated in 2028). The Council considers the draft Our Space document does not publically clarify that the projections, whilst unchanged for the first 10 years, are consequently misleading in the longer term (2028-2048). Investigations with independent economic modellers has confirmed that use of the hybrid approach has implications for the validity of the business capacity assessment. As well as for user clarity, for statutory compliance with the NPS-UDC the Council considers it is imperative the business capacity assessment is updated to reflect the hybrid approach (and any other potential variations of the hybrid approach). The Council believes there is little value in producing a 30 year development strategy if consideration beyond year 10 is informed by inadequate evidence;
- **Addressing social and affordable housing**
The Council acknowledges that Our Space provides a good framework for further actions in Figure 13 (page 20), outlining a range of further action plan work-streams related to the delivery of social and affordable housing in Greater Christchurch. The Council considers Our Space is a suitable platform for outlining more detail and potential partner agreement to initiating these actions. Firm commitments to introducing changes to existing planning provisions could be proposed in order to address insufficient capacity at low to middle price points. There are mechanisms Our Space could be more specifically advocating, such as planning zones and rules to encourage smaller lot sizes and/or multi-unit dwellings, including in appropriate greenfield locations, which can support the provision of housing choice and encourage new housing that is more reflective of projected demand.

Summary

The Christchurch City Council supports the general thrust and intent of Our Space. The document builds upon the settlement pattern reflected in the UDS, and the Council supports the core principles of Our Space, including the agreed objective of ensuring future development occurs within the existing Projected Infrastructure Boundary (PIB). However, the Council does not consider Our Space fully achieves its role as a mechanism for strategic co-ordination across the various partners in the GCP, which in turn ensures it does not provide sufficient substantive intent from the Councils partners to achieve the integrated and management urban development patterns outlined in Figure 3 of Our Space.

The Council wishes to be heard in support of its submission.

Yours faithfully



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