

**PROPOSED CHANGE 1 TO CHAPTER 6 – RECOVERY AND REBUILDING  
OF GREATER CHRISTCHURCH, OF THE CANTERBURY REGIONAL  
POLICY STATEMENT**

**Evaluation under section 32 of the Resource Management Act**

**Environment Canterbury**

**2021**

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## Abbreviations

CRPS	Canterbury Regional Policy Statement
FDS	Future Development Strategy
FDA	Future Development Area
HBA	Housing and Business Development Capacity Assessment
LURP	Land Use Recovery Plan
NPS-HPL	Proposed National Policy Statement on Highly Productive Land
NPS-UD	National Policy Statement on Urban Development 2020
NPS-UDC	National Policy Statement on Urban Development Capacity 2016
PIB	Projected Infrastructure Boundary
RMA	Resource Management Act 1991
UDS	Greater Christchurch Urban Development Strategy

## Executive Summary

This report summarises the evaluation undertaken by the Canterbury Regional Council (**Environment Canterbury**) in developing Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement (**CRPS**). In summary, the Proposed Change identifies areas for future housing development in Rolleston, Rangiora and Kaiapoi on Map A, and inserts associated policy provisions.

The report has been prepared in accordance with section 32 of the Resource Management Act 1991 (**RMA**). It fulfils the requirements of section 32 to prepare an evaluation report that examines whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA, and whether the provisions are the most appropriate way of achieving the objectives.

This report aims to transparently communicate the thinking behind the proposed change to the CRPS, to the community and decision-makers. It tells the 'story' of what is proposed and the reasoning behind it. It also provides a record for future reference of the process, including the methods, technical studies, and consultation that underpins the Proposed Change.

This report includes:

- The planning and strategic context for the proposed change
- A summary of the issue the proposed change seeks to address
- An outline of the development of the proposed change and background information
- A summary of the other reasonably practicable options identified and an evaluation of the provisions of the proposed change in accordance with section 32 of the RMA

# 1. Introduction

## 1.1 Purpose of this report

The Resource Management Act 1991 (**RMA**) requires regional councils to prepare an evaluation report in accordance with section 32 of the RMA when amending regional policy statements. This report is required to be published at the time of public notification of a proposed change.

The purpose of this report is to set out the evaluation that the Canterbury Regional Council (**Environment Canterbury**) has undertaken on Proposed Change 1 to Chapter 6 – Recovery and rebuilding of Greater Christchurch, of the Canterbury Regional Policy Statement (**CRPS**). It includes:

- the planning and strategic context for the proposed change;
- a summary of the issue the proposed change seeks to address;
- an outline of the development of the proposed change and background information; and
- a summary of the other reasonably practicable options identified, and an evaluation of the proposed change in accordance with section 32 of the RMA.

## 1.2 About the Proposed Change

Proposed Change 1 to Chapter 6 of the CRPS (**the Proposed Change**) is a targeted change to enable the Greater Christchurch councils to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) and to implement the growth strategy set out in Our Space 2018-2048: Greater Christchurch Settlement Pattern Update *Whakahāngai O Te Hōrapa Nohoanga* (**Our Space**). A more comprehensive review of Chapter 6 is due to commence in 2021 as part of the scheduled full review of the CRPS.

The outcomes of this Proposed Change are to:

- Implement direction in the NPS-UD (**NPS-UD**) to ensure at least sufficient development capacity to meet expected demand for housing and for business land over the short (three years), medium (ten years) and long term (thirty years) is enabled<sup>1</sup>.
- Implement the settlement pattern and outcomes of Our Space, being the Future Development Strategy for Environment Canterbury, Christchurch City Council, Selwyn District Council and Waimakariri District Council.
- Respond to existing direction in the CRPS to ensure an available supply of residential and business land over the short and long term to meet the objectives and policies of the CRPS, Chapter 6.

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<sup>1</sup> Policy 2, NPS-UD 2020.

In 2017 the Greater Christchurch Partnership<sup>2</sup> initiated a review of the strategic land use planning framework for Greater Christchurch contained in the Greater Christchurch Urban Development Strategy (**UDS**) and Chapter 6 of the CRPS. This review (referred to as the settlement pattern review or update) was undertaken to satisfy the requirements of the National Policy Statement on Urban Development Capacity 2016 (**NPS-UDC**) for high growth councils to produce a future development strategy (**FDS**).

Our Space was collaboratively prepared by the Greater Christchurch Partnership and adopted by the Greater Christchurch councils<sup>3</sup> in June and July 2019. It complements the existing UDS and met the requirement of the NPS-UDC to prepare an FDS. It describes how future housing and business growth will be provided for in Greater Christchurch over the thirty years to 2048, including how minimum targets for sufficient, feasible development capacity for housing will be met.

The population of Greater Christchurch is projected to grow to about 640,000 by 2048, around 150,000 more residents than in 2018. This population growth translates into about 74,000 new households by 2048. When the margins required by the NPS-UDC are added to this housing demand, the number of new dwellings that need to be planned for in Greater Christchurch increases to almost 87,000.

The evidence base underpinning Our Space indicated that, while most of the growth expected to occur in Greater Christchurch could be accommodated within existing urban zonings, in some areas there may be insufficient housing development capacity to meet medium to long term housing demand<sup>4</sup>. A need to amend Map A and Chapter 6 of the CRPS (which incorporates the settlement pattern for Greater Christchurch within a statutory RMA framework) was identified through the development of Our Space, to enable the Greater Christchurch councils to respond to the projected shortfall in such locations.

Map A shows the Existing Urban Area and Greenfield Priority Areas for housing and business development in Greater Christchurch. These areas were identified as required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028, following the 2010 and 2011 Canterbury earthquake sequence. The Partnership had previously considered the longer term growth needs of Greater Christchurch through to 2041, with the extent of planned greenfield areas around Christchurch City and the main towns in Selwyn and Waimakariri to support future housing growth delineated by the Projected Infrastructure Boundary (**PIB**) on Map A. Map A is supported by policies that enable development within the Existing Urban Area and Greenfield Priority Areas shown and steer urban activities to these areas, unless they are otherwise expressly provided for in the CRPS.

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<sup>2</sup> The Greater Christchurch Partnership comprises Environment Canterbury, Christchurch City Council, Selwyn District Council, Waimakariri District Council, Canterbury District Health Board, Te Rūnanga o Ngāi Tahu, Waka Kotahi New Zealand Transport Agency, and the Department of the Prime Minister and Cabinet.

<sup>3</sup> Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury.

<sup>4</sup> At the territorial authority level, given the range of reported feasibility, capacity in the Selwyn and Waimakariri Districts may not be sufficient to meet demand over the medium and long term. The significant capacity in Christchurch City is expected to be sufficient over the next 30 years, even with a higher share of growth apportioned to the City over the long term period.

To help address projected housing capacity shortfalls for the Selwyn and Waimakariri Districts over the medium to long term (ten to thirty years), the strategy in Our Space includes the identification of additional greenfield areas for housing (which are referred to as Future Development Areas (**FDAs**)) in Rolleston, Rangiora and Kaiapoi.

The FDAs are located within the existing PIB on Map A and are consistent with the objectives and policies of the CRPS and the sustainable long-term growth strategy set out in the UDS. By directing future housing growth to development capacity already signalled by the PIB the Proposed Change builds on the work and extensive community input undertaken in developing the UDS and recovery processes that led to Chapter 6 of the CRPS as well as subsequent growth and infrastructure planning undertaken by the District Councils. However, as the FDAs sit outside the Existing Urban Area and Greenfield Priority Areas identified on Map A, the land cannot currently be used for urban activities. As a result, the existing policy framework of the CRPS is an impediment to the rezoning of land within the FDAs to respond to any identified capacity shortfalls for housing.

The NPS-UDC was effective from 16 December 2016 until 20 August 2020, when it was replaced by the National Policy Statement on Urban Development (NPS-UD).

The NPS-UD recognises the national significance of:

- having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- providing sufficient development capacity to meet the different needs of people and communities.

The NPS-UD contains the same underlying approach as the NPS-UDC whereby local authorities must provide [at least] sufficient development capacity to meet expected demand for housing and for business land over the short, medium and long terms. The NPS-UDC obligations on high growth authorities (termed 'Tier 1 authorities' under the NPS-UD) to produce housing and business capacity assessments and future development strategies also remain (albeit with some changes).

### *1.2.1 Scope of the Proposed Change*

The purpose of the Proposed Change is to:

- a. Give effect to Policy 2 and Clause 3.7 of the NPS-UD and enable sufficient land in Greater Christchurch to be rezoned for the medium term (10 years) and identified for the long term (30 years) to meet the needs of existing and future communities, by identifying and enabling additional development capacity for housing in greenfield growth areas within the Projected Infrastructure Boundary shown on Map A in Chapter 6 of the CRPS, in Rolleston, Rangiora and Kaiapoi; and
- b. Provide flexibility for Selwyn and Waimakariri District Councils to consider rezoning land within the Projected Infrastructure Boundary to meet medium term housing demands as part of their

district planning processes, where a sufficiency shortfall is identified through a housing development capacity assessment.

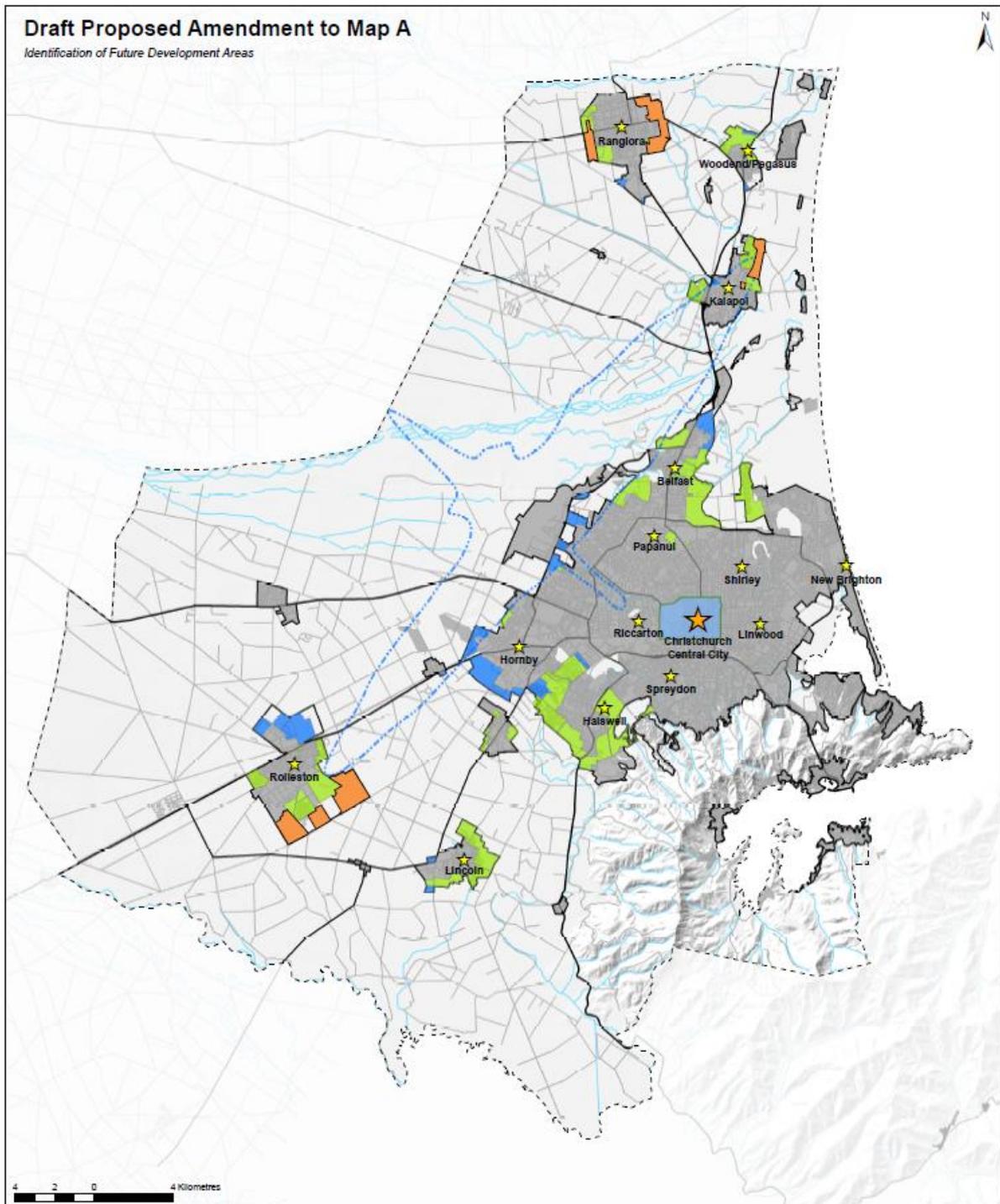
The Proposed Change aligns with the strategy set out in Our Space, which was strongly guided by the vision and strategic goals of the UDS and the comprehensive planning framework that has already been developed for Greater Christchurch to support long term growth. It provides a planning framework for the medium to long term, that will enable the territorial authorities to respond to changes in the sufficiency of development capacity.

The Proposed Change seeks to make the following amendments to Chapter 6 and Map A of the operative CRPS:

- Amend Map A to identify FDAs in Rolleston, Rangiora and Kaiapoi (as shown in Figure 1 below).
- Insert a new policy (Policy 6.3.12), to enable land within these FDAs to be rezoned by Selwyn and Waimakariri District Councils if required to meet their medium term (ten year) housing needs.
- Make consequential changes to objectives, policies, text and definitions within Chapter 6.

This is a targeted change to Chapter 6 to enable the Greater Christchurch councils to give effect to the direction in the NPS-UD to provide sufficient development capacity to meet expected demand and to implement the growth strategy set out in Our Space. A more comprehensive review of Chapter 6 is due to commence in 2021 as part of the full review of the CRPS. Environment Canterbury, in collaboration with Greater Christchurch Partnership organisations, is also preparing a responsive planning policy (to be advanced through a separate RMA process) to implement Part 3, subpart 2, clause 3.8(3) of the NPS-UD. This will insert criteria into the CRPS for determining what plan changes will be treated, for the purpose of implementing NPS-UD Policy 8, as adding significantly to development capacity.

Figure 1 – Proposed Amendment to Map A – Future Development Areas shown in orange



- Legend**
- Key Activity Centres**
    - ★ Key Activity Centre
    - ★ Christchurch Central City
  - Airport Noise Contour**
    - Slibea Airport Noise Contour
  - Christchurch Central Recovery Plan**
    - Christchurch Central Recovery Plan Area
  - Greenfield Priority Areas**
    - Greenfield Priority Area - Business
    - Greenfield Priority Area - Residential
  - Existing Urban Area**
    - Existing Urban Area
  - Projected Infrastructure Boundary**
    - Projected Infrastructure Boundary
    - Projected Future Development Areas
    - Proposed Future Development Areas



Scale:  
1:175,000  
(Original sheet size A3)

Coordinate System:  
NZGO 2000 New Zealand Transverse Mercator

**Disclaimer:**  
This map is a static output of depicted layers and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

Environment Canterbury  
Regional Council

Document Path: \\gdrive\Projects\PET\RPB\_170022\URP.mxd

### 1.3 Streamlined Planning Process

In September 2019 Environment Canterbury applied to the Minister for the Environment to use the Streamlined Planning Process provided for under section 80C of the Resource Management Act, for the Proposed Change to the CRPS.

The Streamlined Planning Process is an alternative plan making process that councils can use in certain circumstances, with Ministerial approval. It is intended to increase flexibility and provide a shortened process in certain circumstances. The process steps and timeframes are set by the Minister and can be tailored to suit the planning issues involved.

To use a Streamlined Planning Process a proposal must satisfy at least one of the criteria in section 80C(2):

- a) the proposed planning instrument will implement a national direction<sup>5</sup>;
- b) as a matter of public policy, the preparation of the planning instrument is urgent;
- c) the proposed planning instrument is required to meet significant community need;
- d) a plan or policy instrument raises an issue that has unintended consequences;
- e) the proposed planning instrument will combine several policy statements or plans to develop a combined document prepared under section 80; or
- f) the expeditious preparation of a planning instrument is required in any circumstance comparable, or relevant to, those set out in paragraphs (a) to (e).

The Proposed Change will implement a national direction, specifically the requirement in the NPS-UD to ensure local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land in Greater Christchurch over the short, medium and long term (Policy 2).

A Streamlined Planning Process must include the following mandatory steps:

- consultation with affected parties (if not already undertaken);
- public or limited notification;
- an opportunity for written submissions and the preparation of a report showing how the submissions have been considered and any resulting changes;
- an evaluation report under s32 or s32AA of the RMA; and

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<sup>5</sup> “National direction” is defined in the RMA as meaning a direction made by (amongst other things) a national policy statement.

- the timeframe for completion of the Streamlined Planning Process.

A Direction issued by the Minister on 29 April 2020 set out the process steps and timeframes that the streamlined process must be undertaken within. A copy of the Gazette notice is attached as Appendix 1.

In August 2020, the Minister granted Environment Canterbury a six-month extension to publicly notify the proposed change. The extension would allow the Council to consider the implications of the NPS-UD (gazetted in July 2020 but coming into effect on 20 August 2020) before notifying the Proposed Change. Notice of the amendment to the Minister’s direction is attached as Appendix 2.

After Environment Canterbury has undertaken the planning process set out in the Direction, it must submit the Proposed Change to the Minister for approval. The Minister may approve the proposed planning document, refer it back to the Council for reconsideration, or decline to approve it.

#### **1.4 RMA Section 32 requirements**

Section 32 of the RMA sets out the requirements for preparing and publishing evaluation reports. Specifically, it requires that an evaluation report for a proposed change to an existing regional policy statement (an amending proposal) must –

- examine the extent to which the purpose of the proposed change is the most appropriate way to achieve the purpose of the RMA;
- examine whether the provisions in the proposed change are the most appropriate way to achieve the objectives of the regional policy statement and the purpose of the proposed change, by:
  - identifying other reasonably practicable options for achieving the objectives of the regional policy statement and the purpose of the proposed change;
  - assessing the efficiency and effectiveness of the proposed provisions in achieving the objectives of the regional policy statement and the purpose of the proposed change; and
  - summarising the reasons for deciding on the proposed provisions; and
- contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal<sup>6</sup>.

The assessment of the efficiency and effectiveness of the proposed provisions in achieving the objectives of the regional policy statement and the purpose of the proposed change must:

- identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposed change, including the opportunities for:

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<sup>6</sup> RMA section 32 (1)(a)-(c) and (3)(a)-(b).

- economic growth that are anticipated to be provided or reduced; and
- employment that are anticipated to be provided or reduced; and
- if practicable, quantify the benefits and costs; and
- assess the risk of acting or not acting if there is uncertain or insufficient information<sup>7</sup>.

The evaluation report must also summarise any relevant advice from iwi authorities, including Environment Canterbury's response to that advice and any provisions that are intended to give effect to the advice<sup>8</sup>.

This report has been prepared in accordance with the requirements of section 32 of the RMA and guidance on section 32 produced by the Ministry for the Environment<sup>9</sup>.

## **2. Planning and strategic context**

### **2.1 Resource Management Act 1991**

The RMA provides the regulatory framework for the development of resource management planning documents. The RMA sets out the legislative hierarchy of these documents, including direction on what must be considered in the preparation or change of regional policy statements.

The RMA requires regional councils to prepare and change regional policy statements in accordance with:

- (a) its functions under section 30;
- (b) the provisions of Part 2;
- (c) its obligation (if any) to prepare an evaluation report in accordance with section 32;
- (d) its obligation to have particular regard to an evaluation report prepared in accordance with section 32;
- (da) a national policy statement, a New Zealand coastal policy statement, and a national planning standard; and
- (e) any regulations<sup>10</sup>.

Regional council functions specified under Section 30 of the RMA include the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient

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<sup>7</sup> RMA section 32 (2)(a)-(c).

<sup>8</sup> RMA section 32 (4A)(a)-(b)).

<sup>9</sup> Ministry for the Environment, 2017, A guide to section 32 of the Resource Management Act: Incorporating changes as a result of the Resource Legislation Amendment Act 2017.

<sup>10</sup> RMA section 61(1)(a)-(e)

development capacity in relation to housing and business land to meet the expected demands of the region<sup>11</sup>.

In addition, when preparing or changing a regional policy statement, the RMA requires regional councils to have regard to:

- any:
  - management plans and strategies prepared under other Acts;
  - relevant entry on the New Zealand Heritage List/Rārangi Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; and
  - regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taiāpure, mahinga mātaītai, or other non-commercial Maori customary fishing)

to the extent that their content has a bearing on resource management issues of the region;

- the extent to which the regional policy statement needs to be consistent with the policy statements and plans of adjacent regional councils; and
- the extent to which the regional policy statement needs to be consistent with regulations made under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012<sup>12</sup>.

Regional councils must also take into account any relevant planning document recognised by an iwi authority<sup>13</sup>.

In preparing or changing any regional policy statement, a regional council must not have regard to trade competition or the effects of trade competition<sup>14</sup>.

The RMA also requires that a regional policy statement must not be inconsistent with any water conservation order and must give effect to a national policy statement, a New Zealand coastal policy statement, or a national planning standard<sup>15</sup>.

Documents of particular relevance to the Proposed Change, include:

- The National Policy Statement on Urban Development Capacity 2016 and its replacement the National Policy Statement on Urban Development 2020 (see section 2.2 of this report)
- The Mahaanui Iwi Management Plan 2013 (see section 2.3)

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<sup>11</sup> RMA section 30 (1)(ba).

<sup>12</sup> RMA section 61(2)(a)-(c)

<sup>13</sup> RMA section 61(2A)

<sup>14</sup> RMA section 61(3)

<sup>15</sup> RMA section 62(3)

- The Land Use Recovery Plan 2013 *Ta Mahere Whakahaumanu Tāone* (see section 2.4)
- Our Space 2018-2048: Greater Christchurch Settlement Pattern Update *Whakahāngai O Te Hōrapa Nohoanga* (see section 3.1)

## 2.2 National Policy Statement on Urban Development Capacity 2016 and National Policy Statement on Urban Development 2020

### National Policy Statement on Urban Development Capacity 2016

The National Policy Statement on Urban Development Capacity 2016 (**NPS-UDC**) set out the objectives and policies for providing development capacity under the RMA.

It was effective from 16 December 2016 until 20 August 2020, when it was replaced by the National Policy Statement on Urban Development 2020.

The NPS-UDC is relevant to this section 32 report to the extent that it was in effect when Our Space (the Greater Christchurch Future Development Strategy) was adopted and the Proposed Change was being developed, and it was under this national direction that the application to use a streamlined planning process was made and approved by the Minister.

It required local authorities to ensure that, at any one time, there is sufficient development capacity (supported by infrastructure) provided for in their resource management plans to meet demand for housing and business land. Capacity can be provided outwards (on greenfield sites) and/or upwards (by intensifying existing urban environments).

Policy PA1 was a central policy of the NPS-UDC, stating that local authorities shall ensure that at any one time there is sufficient, feasible development capacity, according to the table below, in the short (three years), medium (ten years) and long term (thirty years).

**Table 1 – NPS-UDC Policy PA1 housing and business land development capacity requirements**

Period	Policy PA1 Requirement
Short term [0-3 years]	Development capacity must be feasible, zoned and serviced with development infrastructure.
Medium term [3-10 years]	Development capacity must be feasible, zoned and either: <ul style="list-style-type: none"> <li>• Serviced with development infrastructure, or</li> <li>• The funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002.</li> </ul>
Long term [10-30 years]	Development capacity must be feasible, identified in relevant plans and strategies, and the development infrastructure required to service it must be identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.

The definition of ‘demand’ is core to the definition of sufficient development capacity, and in the policies requiring demand to be assessed as part of the evidence and monitoring to support planning decisions (PB1 and PB2). An important feature of the definition of ‘demand’ is that it emphasises both the total quantity of demand in a local area and the subsets of that demand (by location, type and price point).

Policies PA2, PA3 and PA4 also directed local authority decision making. These policies recognised the importance of infrastructure to support urban development and that in providing development capacity, local authorities needed to provide for the social, economic, cultural and environmental wellbeing of people, communities and future generations, but not without considering the effects of development (including national and interregional benefits and costs, as well as those at the regional, district and local level).

While the objectives and high level policies of the NPS-UDC applied to all local authorities, some policies applied only to local authorities that had part, or all, of either a medium growth urban area or high growth urban area within their district or region.

In 2016, the Christchurch urban area (which includes the towns of Prebbleton in Selwyn District and Kaiapoi in Waimakariri District) was defined by Statistics NZ as a high growth urban area. Given the strategic planning arrangements that already existed between Greater Christchurch councils through the Greater Christchurch Partnership, it was agreed that the urban area covered by the UDS would be the geographic area of focus and the relevant urban environment for the purposes of meeting the NPS-UDC requirements. This area is defined in Map A of Chapter 6 of the CRPS.

The key additional NPS-UDC requirements for local authorities with high growth urban areas were to:

- Carry out quarterly monitoring of market indicators (PB6)
- Complete a housing and business development capacity assessment on at least a three yearly basis (PB1 to PB5)
- Produce a future development strategy (PC12 to PC14)
- Set minimum housing targets in regional policy statements and district plans (PC5 to PC11)

The Greater Christchurch Partnership met these requirements, with links to the relevant outputs provided in the following table.

**Table 2 – Monitoring and capacity assessments for Greater Christchurch**

NPS-UDC Output	Link
Urban Development Indicators - Quarterly Monitoring Reports	<a href="http://greaterchristchurch.org.nz/ourspace/urban-development-indicators/">http://greaterchristchurch.org.nz/ourspace/urban-development-indicators/</a>
Summary Housing and Business Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Housing-and-Business-Development-Capacity-Assessment-Summary.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Housing-and-Business-Development-Capacity-Assessment-Summary.pdf</a>

Technical Housing Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Greater-Christchurch-Housing-Capacity-Assessmentreports-1-4.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Greater-Christchurch-Housing-Capacity-Assessmentreports-1-4.pdf</a>
Technical Business Development Capacity Assessment	<a href="http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-5-Business-Development-Capacity.pdf">http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-5-Business-Development-Capacity.pdf</a>

The NPS-UDC required high growth local authorities to prepare a capacity assessment every three years and monitor market indicators on a quarterly basis. This ensures that local authorities have a robust and up-to-date base of information on which to make decisions that impact development capacity and, ultimately, the supply and price of housing and business space. When the evidence base or monitoring indicates that development capacity is not sufficient in any of the short, medium or long term, the NPS-UDC required local authorities to respond by providing further development capacity and enabling development in accordance with policies PA1, PC1 or PC2, and PC4.

Policies PC5 to PC11 related to the setting of minimum targets for sufficient, feasible development capacity for housing. The targets reflect the overall quantity of demand for housing identified in the capacity assessment and include the additional margins required under policies PC1 or PC2. Minimum targets must be set for the medium (10 years) and long term (30 years) and the NPS-UDC required that these be reviewed every three years.

The NPS-UDC directed regional councils to incorporate minimum targets into their regional policy statements. Territorial authorities were required to incorporate minimum targets, as a proportion of the regional minimum target, into a relevant resource management plan.

Minimum housing targets for Greater Christchurch are set out in Our Space (Table 2). In July 2019 the targets were inserted into the CRPS as a new Objective 6.2.1a without using the Schedule 1 process, in accordance with policy PC8. The targets were also inserted into the district plans for Christchurch City, Selwyn and Waimakariri.

Policies PC12 to PC14 of the NPS-UDC related to the preparation of an FDS. A key requirement of an FDS is that it demonstrates there will be sufficient, feasible development capacity for housing and business in the medium and long term. As noted earlier in this report, the settlement pattern update (Our Space 2018-2048) undertaken by the Greater Christchurch Partnership was jointly adopted by Environment Canterbury, Christchurch City Council, Selwyn District Council and Waimakariri District Council as the FDS for Greater Christchurch in 2019.

### **National Policy Statement on Urban Development 2020**

The NPS-UD was gazetted on 23 July and took effect on 20 August 2020, replacing the NPS-UDC. It retained many of the requirements under the NPS-UDC, but introduced a wider focus and added significant new and directive content.

The NPS-UD is part of the urban planning pillar of the Government's Urban Growth Agenda. To support productive and well-functioning cities, it seeks to ensure that regional policy statements and

regional and district plans provide adequate opportunity for land development for business and housing to meet community needs. The NPS-UD is designed to improve the responsiveness and competitiveness of land and development markets.

The NPS-UD applies to all local authorities that have all or part of an urban environment within their district or region (identified as Tier 1, 2 and 3 local authorities), and to planning decisions (including resource consent decisions) by any local authority that affect an urban environment.

For the purpose of the NPS-UD, Christchurch is identified as a Tier 1 urban environment and Environment Canterbury, Christchurch City Council, Waimakariri District Council and Selwyn District Council are Tier 1 local authorities. Not all land falling within the jurisdiction of the three territorial authorities is an “urban environment” – this is defined in the NPS-UD as any area of land that is, or is intended to be: (a) predominantly urban in character; and (b) part of a housing and labour market of at least 10,000 people. As noted above, given the strategic planning arrangements that already exist between the Greater Christchurch councils through the Greater Christchurch Partnership, it was agreed that the urban area covered by the UDS would be the geographic area of focus and the relevant urban environment for the purposes of meeting the NPS-UDC requirements. This area is defined in Map A of Chapter 6 of the CRPS.

The NPS-UD retains many of the obligations of the previous NPS-UDC, including a requirement to:

- Provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term (Policy 2)\*. In order to be ‘sufficient’ to meet expected demand for housing, the development capacity must be:
  - Plan-enabled (i.e. in relation the short-term, zoned in an operative district plan; in relation to the medium-term zoned in an operative or proposed district plan; in relation to the long-term, zoned or identified for future urban use or intensification in an FDS)<sup>16</sup>; and
  - Infrastructure-ready (i.e. development infrastructure is available (short-term), funded (medium-term), or identified in a local authority’s infrastructure strategy (long-term)<sup>17</sup>; and
  - Feasible and reasonably expected to be realised<sup>18</sup>; and
  - For Tier 1 and 2 local authorities, meet the expected demand plus the appropriate competitiveness margin<sup>19</sup>.
- Set housing bottom lines for the short to medium term and the long term in regional policy statements and district plans (Policy 7).

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<sup>16</sup> NPS-UD 2020 Part 3, sub-part 1, clause 3.4(1).

<sup>17</sup> NPS-UD 2020 Part 3, subpart 1, clause 3.4(3).

<sup>18</sup> NPS-UD 2020 Part 3, subpart 5, clause 3.26.

<sup>19</sup> NPD-UD 2020 Part3, subpart 1, clause 3.2.

- Undertake quarterly monitoring of urban development indicators (Part 3, subpart 3, clause 3.9).
- Prepare a Housing and Business Development Capacity Assessment (**HBA**) (Part 3, subpart 5); and
- Prepare a Future Development Strategy (Part 3, subpart 4).

\*If a local authority determines that there is insufficient development capacity over the short term, medium term, or long term, it must:

- a) Immediately notify the Minister for the Environment; and
- b) If the insufficiency is wholly or partly a result of RMA planning documents, change those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy (including any FDS, as required by subpart 4); and
- c) Consider other options for:
  - i. Increasing development capacity; and
  - ii. Otherwise enabling development (Part 1, sub-part 1, clause 3.7).

The Greater Christchurch Partnership has already commenced work to update the Greater Christchurch Housing Development Capacity Assessment. This will need to be adapted to address new requirements under the NPS-UD ahead of the 31 July 2021 timeframe required by the NPS-UD. The Partnership is also exploring options for the development of a new FDS, in time to inform 2024 Long Term Plans.

Central to the NPS-UD is a new, broader focus on the achievement of ‘well-functioning urban environments’ (Objective 1 and Policy 1). Policy 1 articulates a set of outcomes for local authorities to use when preparing plans and making decisions, and sets direction for the intended outcomes of the NPS-UD. The objectives and policies also include specific references to climate change (Objective 8, and Policies 1 and 6) and Te Tiriti o Waitangi (Objective 5 and Policy 9).

The NPS-UD requires local authorities to provide for intensification, particularly in areas close to urban centres, places that are well-served by public transport, and other areas with high demand for housing and business space (Objective 3 and Policies 3, 4 and 5). This includes enabling building heights and density to realise as much development capacity as possible in city centre zones; enabling building heights of at least six storeys in metropolitan centre zones and in ‘walkable catchments’ (as yet undefined) of rapid transit stops, city centre zones and metropolitan zones. In all other locations building heights and density should be commensurate to the level of accessibility and demand.

The NPS-UD requires territorial authorities to remove minimum car parking rates from district plans by February 2022 (Policy 11 and Clause 4.1).

The NPS-UD also introduced a new requirement for local authority decisions affecting urban environments to be responsive to plan change requests that would enable significant development

capacity, even if the development capacity is unanticipated by RMA planning documents or out of sequence with planned land release (Policy 8). The intent of Policy 8 is to ensure councils are responsive to significant development proposals that could improve competition in land markets, accelerate land supply and discourage land banking.

To trigger the responsive planning policy, a plan change would need to add significantly to development capacity, contribute to a well-functioning urban environment and be well-connected along transport corridors (Part 3, subpart 2). Regional councils are required by the NPS-UD (Part 3, subpart 2, clause 3.8(3)) to include criteria in regional policy statements for determining what plan changes will be treated, for the purpose of implementing NPS-UD Policy 8, as adding significantly to development capacity.

Environment Canterbury has been working collaboratively with partner councils and Waka Kotahi New Zealand Transport Agency, and in liaison with Mahaanui Kurataiao to prepare draft significance criteria as part of a responsive planning policy that meets this NPS-UD requirement. Due to timing and the scope of the Minister's direction to use the streamlined planning process it was not possible to notify the draft criteria as part of the Proposed Change. The development of the significance criteria will however continue to be progressed in parallel and implemented by way of a separate RMA process.

### **2.3 Mahaanui Iwi Management Plan**

The Mahaanui Iwi Management Plan 2013 provides a statement of objectives, issues and policies for natural resource and environmental management in the Ngāi Tahu takiwā. Regard has been had to the Iwi Management Plan in preparing the Proposed Change, in accordance with section 61(2)(a)(i).

The Iwi Management Plan is an expression of kaitiakitanga and rangatiratanga reflecting the values of six papatipu rūnanga<sup>20</sup>. The plan is a tool that assists tāngata whenua to protect taonga and the relationship with tāngata whenua by ensuring that the management of land and water resources achieves meaningful cultural and environmental outcomes. The plan describes regional objectives, issues and policies on different subject matter and then provides additional policies for 12 geographic areas.

A summary of the relevant issues and outcomes sought by the Iwi Management Plan is provided below.

Section 5.4 Papatūānuku is of particular relevance to the Proposed Change. This section addresses issues of significance to the takiwā relating to Papatūānuku, the land. An important kaupapa of Ngāi Tahu resource management perspectives and practice is the protection and maintenance of the mauri of Papatūānuku, and the enhancement of mauri where it has been degraded by humans. Objectives seek to protect the mauri of land and soil resources as well as cultural heritage values, to

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<sup>20</sup> Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke (Rāpaki), Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga and Te Taumutu Rūnanga.

recognise and provide for the relationship between Ngāi Tahu and the land, and ensure Ngāi Tahu has a prominent and influential role in urban planning and development.

Issue P5 and policies P5.1-P5.4 relate to papakāinga housing. The Iwi Management Plan highlights that papakāinga development is not easily provided for within existing planning and policy frameworks, and that legal land controls such as zoning and housing density rules can be a barrier, as papakāinga developments may require smaller lot sizes or higher density housing than allowed in particular zones. Although papakāinga development is not directly addressed through this targeted change to Chapter 6, it is appropriate that this matter is considered through the forthcoming full review of the CRPS.

Section 5.8, Nga tūtohu whenua addresses issues associated with Ngāi Tahu cultural heritage: sites, places, resources, traditions, knowledge, and landscapes of importance to Ngāi Tahu. This includes wāhi tapu, wāhi taonga, mahinga kai and other sites of significance, and the traditional and contemporary landscapes within which they occur.

Section 6.4 addresses issues of particular significance to the lands and waters of the Waimakariri catchment, within which the towns of Rangiora and Kaiapoi are situated. Section 6.11 addresses issues of particular significance in the catchment of Te Waihora, which extends to Rolleston, though much of the focus relates to the lake and its catchment.

## **2.4 Settlement Planning in Greater Christchurch**

The Greater Christchurch Partnership has worked collaboratively over more than a decade on planning and managing urban growth and development in Greater Christchurch to support the long-term needs of people and communities.

### *2.4.1 Urban Development Strategy 2007*

The Urban Development Strategy (**UDS**) provides the strategic direction for urban growth in Greater Christchurch to 2041. The settlement pattern seeks to consolidate development in and around well-defined urban and rural town centres. It includes the identification of Rolleston, Rangiora and Kaiapoi as indicative growth areas.

The UDS contains an action plan to implement the strategic directions and the Greater Christchurch settlement pattern. One of the priority actions was to prepare Chapter 12A of the CRPS to provide specific guidance on where growth and intensification will occur based on the settlement pattern in the UDS.

An update of the UDS was completed in 2016.

### *2.4.2 Proposed Change 1 to the Canterbury Regional Policy Statement (Chapter 12A)*

Proposed Change 1 (**PC1**) (Chapter 12A) to the CRPS, was notified in 2007. It provided the sub-regional policy framework under the RMA to implement the UDS, setting out direction for the growth, development and enhancement of the urban and rural areas of Greater Christchurch for the period to 2041. PC1 (Map 1) identified 'Urban Limits' – being the extent of greenfields development

within Greater Christchurch, to provide for growth to 2041. The land now proposed to be identified as FDAs was included within the Urban Limits.

At the time of the February 2011 earthquake PC1 was subject to appeals in the Environment Court. When the Canterbury Earthquake Recovery Act 2011 (**CER Act**) came into force, the UDS Partners (now the Greater Christchurch Partnership) asked the Minister for Canterbury Earthquake Recovery (**the Minister**) to insert a modified version of PC1 into the CRPS under section 27 of the CER Act. This had the effect of making PC1, which was inserted as Chapter 12A of the CRPS, operative and removing the appeals from the Environment Court. The modified version was PC1 with some amendments to respond to the earthquake and some changes that had been sought by the Christchurch City Council and Waimakariri District Council through appeals lodged with the Environment Court.

Following a judicial review of the Minister's decision to insert Chapter 12A into the CRPS, and subsequent appeal to the Court of Appeal, Chapter 12A was removed from the CRPS and Environment Canterbury was directed by the Minister to prepare a recovery plan.

#### *2.4.3 Land Use Recovery Plan 2013*

The Land Use Recovery Plan 2013 (**LURP**) is a statutory document, prepared under the Canterbury Earthquake Recovery Act 2011. It was prepared by Environment Canterbury in collaboration with Te Rūnanga o Ngāi Tahu, Christchurch City Council, Selwyn District Council, Waimakariri District Council, the New Zealand Transport Agency and the Canterbury Earthquake Recovery Authority. Its purpose was to provide for residential and business land use to support recovery and rebuilding to 2028. The LURP directed changes to RMA documents, including amendments to district plans, and the insertion of Chapter 6 in the CRPS.

Having made the changes to planning documents as directed by the LURP, and with a planning horizon only to 2028, the relevance of the LURP for future urban planning is diminished. However, the Greater Christchurch Regeneration Act 2016 requires that any decisions on resource consents or notices of requirement, or the preparation, change, variation, or review of an RMA document under Schedule 1, must not be inconsistent with the LURP<sup>21</sup>.

The Proposed Change is not inconsistent with the LURP. It broadly aligns with the vision, goals and outcomes of the LURP. It also supports the framework of actions set out in the LURP.

The LURP identified greenfield priority areas for new residential subdivisions to meet anticipated demand through to 2028 (Figure 4 on page 23 of the LURP). This map was inserted as Map A in Chapter 6 of the CRPS. The Proposed Change identifies land within the Projected Infrastructure Boundary shown on Figure 4 (and Map A), to provide for additional housing demand over the medium term.

In April 2016, the Minister for Canterbury Earthquake Recovery, Hon Gerry Brownlee, gave approval under section 22(1) and (2) of the Canterbury Earthquake Recovery Act 2011 to make a number of amendments to the LURP. These amendments included:

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<sup>21</sup> Greater Christchurch Regeneration Act 2016 s60 (1) Subsection (2)(a)-(f)

- making Figure 4 (Map A Greenfield Priority Areas) ‘indicative only’, to allow changes to Map A in Chapter 6 of the CRPS through normal Resource Management Act processes, and provide clarity to decision-makers when determining re-zoning or resource consent matters
- removing Appendix 1 of Volume 2 of the LURP, Amendments to the Canterbury Regional Policy Statement, because it had already been inserted as Chapter 6 to the CRPS and its removal would allow Environment Canterbury to make changes to Chapter 6.

#### 2.4.4 *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update*

In 2017 the Greater Christchurch Partnership initiated a review of the strategic land use framework for Greater Christchurch to satisfy the requirement of the NPS-UDC to produce a future development strategy.

Our Space was collaboratively prepared under Part 6 of the Local Government Act 2002 by the Greater Christchurch Partnership. It complements the existing UDS and was adopted as the joint future development strategy for Greater Christchurch by Environment Canterbury and Christchurch City Council, Selwyn District Council and Waimakariri District Council during June and July 2019.

Section 3.1 below explains more about the preparation and role of Our Space. A short overview summary is also provided at Appendix 6.

### **3. Background to the development of the Proposed Change**

#### **3.1 Our Space 2018-2048: Greater Christchurch Settlement Pattern Update**

Our Space was collaboratively prepared by the Greater Christchurch Partnership and adopted as the joint FDS for Greater Christchurch by Environment Canterbury, the Christchurch City Council, Selwyn District Council and Waimakariri District Council in June and July 2019. It sets out a preferred settlement pattern for Greater Christchurch, guided by the vision, goals and principles of the UDS.

Our Space outlines key strategic planning directions to ensure there is sufficient development capacity for housing and business growth across Greater Christchurch to 2048. In particular, it:

- Sets out how targets for housing for the next 30 years will be met, accommodating an additional 150,000 people.
- Identifies locations for housing growth, encouraging Central City and suburban centre living while providing for township growth in Rolleston, Rangiora and Kaiapoi.
- Reinforces the role of key centres in providing additional retail and office floorspace as required, in particular the Central City and, if needed, a transition of its surrounding light industrial zones.

- Promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise.
- Recognises the existing industrial land provision as sufficient to cater for industrial growth for some time yet.
- Outlines a series of implementation actions and further work required to give effect to Our Space.

### 3.1.1 Development process

The following table sets out a summary of the development process for Our Space.

**Table 3 – Our Space 2018-2048 development process**

Date	Milestone
April 2017	Greater Christchurch Partnership ( <b>GCP</b> ) Committee endorsed the approach to undertaking the settlement pattern review project
March 2018	GCP Committee endorsed the draft Summary Housing and Business Development Capacity Assessment
May 2018	GCP Committee endorsed the scope and approach to producing a future development strategy
September / October 2018	Partner organisations ratified draft future development strategy for the purposes of consultation (titled Our Space 2018-2048: Greater Christchurch Settlement Pattern Update)
October 2018	GCP Committee adopted Our Space for the purposes of consultation
November 2018	Draft Our Space document released for public consultation
February / March 2019	Public Hearings held on Our Space
June 2019	Report and Recommendations of the Hearing Panel endorsed by GCP Committee
June / July 2019	Our Space adopted by Environment Canterbury, Christchurch City Council, Selwyn District Council and Waimakariri District Council as the FDS for Greater Christchurch and housing targets set

### 3.1.2 Development of the Future Development Strategy

In developing Our Space an initial Options Assessment was undertaken to consider the appropriateness of the existing strategic planning framework<sup>22</sup>. Two options to address any potential development capacity shortfalls were considered:

<sup>22</sup> Greater Christchurch Partnership, Greater Christchurch Settlement Pattern Update – Options Assessment report (version 1)

Option 1 – altering the current urban form directions outlined in the UDS, Chapter 6 of the CRPS, and district plans for Christchurch City, Selwyn District and Waimakariri District; or

Option 2 – being consistent with the current urban form directions.

The Greater Christchurch Partnership had endorsed an Urban Development Strategy Update in 2016, reconfirming the UDS vision, principles and strategic goals for Greater Christchurch. The Settlement Pattern Review was developed to be consistent with this approach (Option 2). The urban form directions contained in the UDS, CRPS and district plans were considered to remain relevant as:

- i. the intended outcomes resulting from a more consolidated urban form are still desirable and supported by academic literature on sustainable city strategies
- ii. the overwhelming support for a more consolidated urban form, as expressed through feedback and submissions received during the extensive development and engagement phase of the UDS 2007, provides an enduring mandate for such an approach
- iii. analysis of public and stakeholder feedback from related consultations since 2011, undertaken as part of the UDS Update 2016, confirms continued community support for such an approach
- iv. maintaining this approach provides continued planning certainty in a post-recovery environment
- v. the strategic directions support existing investments made over the last decade, including the substantial investment by the Crown, public agencies and private sector as part of the rebuild
- vi. they align well with the Government’s Urban Growth Agenda and Government Policy Statement on Land Transport, and support scheduled but not completed public and private investment plans (including the delivery of anchor projects identified in the Christchurch Central Recovery Plan)
- vii. the outcomes would support achievement of recently adopted national and local carbon neutral goals and wider health, well-being and quality of life objectives
- viii. some post-earthquake trends and structural changes in the economy are still emerging and so it is too soon to reconsider the current framework at this stage
- ix. the pace of technological change, particularly in the transport sector, and the implications for sustainable urban form are uncertain so do not justify reconsideration of the current framework at this stage.<sup>23</sup>

The Settlement Pattern Review was therefore developed to be consistent with the current strategic land use framework of the UDS, CRPS and district plans and their integration within the wider transport and infrastructure planning approaches across Greater Christchurch.

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<sup>23</sup> Greater Christchurch Partnership, Greater Christchurch Settlement Pattern Update – Options Assessment report (version 1)

### 3.1.3 Sufficiency of development capacity

To inform the preparation of an FDS the NPS-UDC required that a housing and business development capacity assessment (**Capacity Assessment**) be carried out. This estimated the demand for dwellings (types of dwellings, locations and price points) and business land (types and locations) and the supply of development capacity to meet this demand, in order to assess the sufficiency of feasible development capacity in the short, medium and long term.

The Greater Christchurch Capacity Assessment was prepared in 2018. Options were investigated to determine the most appropriate approach to address the overall housing demand for Greater Christchurch<sup>24</sup>. In essence, the three options differed in the extent of development capacity for new dwellings provided in and around the main Selwyn and Waimakariri towns in Greater Christchurch to that provided within the existing Christchurch City urban area.

The preferred option was a transitional approach whereby housing targets align with projected demands over the medium term (2018 to 2028) but allow for a greater share of new households in Greater Christchurch to be supported through redevelopment in the City over the long term (2028 to 2048), being comparable to that originally envisaged by the UDS prior to the impacts of the earthquakes<sup>25</sup>.

The Capacity Assessment identified that collectively the district plans for Christchurch City, Selwyn District and Waimakariri District provide enabled feasible capacity to build around 74,000 additional dwellings. The scale and location of this feasible capacity will change over the lifetime of the FDS as market conditions change.

Based on the housing targets, the overall amount of feasible housing development capacity in Greater Christchurch was deemed sufficient to meet demand over the medium term (plus the additional capacity margins that were required by the NPS-UDC). However, there was insufficient development capacity in certain locations within Greater Christchurch in the medium term and overall for the long term.

At the territorial authority level, given the range of reported feasibility, capacity in Selwyn and Waimakariri may not be sufficient to meet demand over the medium term. A potential shortfall of 5,475 dwellings in Selwyn District and 7,675 dwellings in Waimakariri District over the long term was projected. The significant capacity in Christchurch City was expected to be sufficient over the next 30 years, even with a higher share of growth apportioned to the City over the long term period.

This assessment was summarised in *Our Space* and is reproduced in Table 4 below.

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<sup>24</sup> Greater Christchurch Partnership, Greater Christchurch Settlement Pattern Update – Options Assessment report (version 1)

<sup>25</sup> The regional targets for Greater Christchurch correspond to projected demand, it is only the territorial authority apportionment of these targets over the long term that represents a transitional approach.

**Table 4 – Sufficiency of housing development capacity in Greater Christchurch against Housing Targets 2018-2048**

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity	
			Medium term (2018-2028)	Long term (2018-2048)
Christchurch City	59,950*	55,950	+38,875	+4,000
Selwyn	9,725**	17,290	+1,825***	-5,475***
Waimakariri	4,200**	13,360	-1,600***	-7,675***
Greater Christchurch	73,875	86,600	+39,100***	-9,150***

Note: Capacity figures included in the table represent number of dwellings (numbers have been rounded to the nearest 25).

In the medium term, capacity for around 3,500 dwellings in Christchurch is constrained by the provision of necessary infrastructure.

Sufficiency of housing development capacity will be reviewed and published as further feasibility modelling and investigation is completed.

These housing targets include the additional capacity margins required by the NPS-UDC as shown in Table 1.

\* Alternative modelled scenarios documented in the Capacity Assessment, which are based on less favourable assumptions, identified development capacity for approximately 52,675 or 36,400 dwellings.

\*\* These capacity figures are derived from a qualitative assessment of greenfield land only. An alternative modelled scenario, including existing zoned land and incorporating changes in prices and costs over time, identified development capacity for the long term of approximately 9,200 dwellings in Selwyn and 6,100 dwellings in Waimakariri.

\*\*\* 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.

### 3.1.4 Meeting future housing demand

The strategy set out in Our Space is to meet the projected shortfalls in housing development capacity through:

- a. Redevelopment of existing urban areas in Christchurch City;
- b. Existing greenfield areas in Christchurch City, Selwyn and Waimakariri Districts; and
- c. New greenfield and redevelopment areas in Selwyn and Waimakariri Districts.

While most of the growth expected to occur in Greater Christchurch can be accommodated within existing urban environments, Our Space identifies additional greenfield areas for housing (future development areas) in Rolleston, Rangiora and Kaiapoi, to help address projected housing capacity shortfalls for Selwyn and Waimakariri Districts over the medium to long term.

The FDAs are located within the existing PIB identified on Map A and are consistent with the long-term growth strategy set out in the UDS. These areas have been identified in Greater Christchurch long term growth strategies since 2007 and have been subject to extensive consultation (see Section 2.4).

**Figure 2 – Figure 15 from Our Space, Proposed Future Development Areas**

Figure 15: Proposed future development areas in Rolleston, Kaiapoi and Rangiora



Our Space identifies the FDAs as having the potential to provide for over 10,000 houses (see Table 5 below). Actual housing capacity numbers will be determined once district structure planning and / or outline development plan processes are complete.

**Table 5 – Proposed Future Development Areas**

FDA Location	Existing land use/s / zoning	Total area	Anticipated yield
Rolleston	Rural / Inner Plains	470ha	4,700*-7,050^ dwellings
Kaiapoi	Rural	105ha	1,050*-1,575^ dwellings
Rangiora	Rural	345ha	3,450*-5,175^ dwellings

\*Based on a density of 10hh/ha

^Based on a density of 15hh/ha

As the FDAs sit outside the Existing Urban Area and Greenfield Priority Areas identified on Map A in the CRPS, the land cannot currently be used for urban activities. As a result, the existing policy framework of the CRPS provides an impediment to the rezoning of land within the FDAs to respond to identified capacity shortfalls for housing.

Our Space identifies a need to progress a change to Chapter 6 of the CRPS at the earliest opportunity. This would enable the Selwyn and Waimakariri District Councils to identify and/or rezone land within these areas as part of those councils’ district plan processes, if required, to meet medium term housing needs. This action is set out in the Schedule of Future Work in Section 6.2 of Our Space (Action 9a):

*a. Prepare a Proposed Change to Chapter 6 of the CRPS at the earliest opportunity to:*

- *modify Map A to identify the Future Urban Development Areas shown in Figure 15, and include a policy in Chapter 6 of the CRPS that enables land within the Future Development Areas to be rezoned*

*in District Plans for urban development if there is a projected shortfall in housing development capacity in Table 3 of Our Space, or if the capacity assessment referred to in Action 6 (or subsequent periodic capacity assessments) identifies a projected shortfall in feasible development capacity.*

- *enable territorial authorities to respond to changes in the sufficiency of development capacity over the medium term on a rolling basis as a result of periodic capacity assessments*

#### **4. Summary of the issue**

The review of the settlement pattern for Greater Christchurch completed in 2019 identified a potential shortfall in the sufficiency of development capacity to meet housing demand in Selwyn and Waimakariri Districts over the medium to long term.

A key role of Chapter 6 of the CRPS is to set out a framework for accommodating expected future population and household growth in Greater Christchurch. In doing so, it identifies a land use and infrastructure framework that enables urban development within specified spatial areas. The review of the settlement pattern for Greater Christchurch and supporting evidence base has indicated that this framework does not currently enable sufficient development capacity to meet housing demands over the medium and long term, to 2048.

Our Space sets out a proposed approach to meet the projected shortfalls, which includes the identification of additional greenfield growth areas in Rolleston, Rangiora and Kaiapoi. Our Space was collaboratively prepared by the Greater Christchurch Partnership with widespread public consultation and was adopted as the joint FDS for Greater Christchurch in 2019.

The settlement pattern set out in Our Space cannot be implemented without a change to the CRPS. The existing policy framework of Chapter 6 and Map A prevent the district councils from rezoning land within the greenfield growth areas that have been identified in Our Space to accommodate additional capacity. In this regard, the CRPS is currently constraining the ability for the district councils to ensure sufficient capacity is enabled and give effect to the NPS-UD.

To address the issue, the Proposed Change seeks to implement the approach set out in Our Space. In developing the Proposed Change, a number of options were considered. These are evaluated in Section 7 of this report.

#### **5. Consultation**

This section summarises the consultation undertaken on the Proposed Change to Chapter 6. Consultation has been undertaken with affected parties and iwi in accordance with Schedule 1, clauses 1A-3C of the RMA.

Clause 3(1), Schedule 1 to the RMA includes requirements to consult certain parties during the preparation of a proposed plan. In accordance with this, emails with links to a copy of the proposed draft provisions were sent to the following parties for comment:

- Minister for the Environment

- Minister of Transport and Urban Development
- Minister for Greater Christchurch Regeneration
- Minister of Conservation
- Ashburton District Council
- Timaru District Council
- Mackenzie District Council
- Waitaki District Council
- Waimate District Council
- Waimakariri District Council
- Kaikoura District Council
- Christchurch City Council
- Hurunui District Council
- Selwyn District Council
- Summit Road Protection Authority
- New Zealand Transport Agency
- Canterbury District Health Board
- Regenerate Christchurch
- Greater Christchurch Partnership
- Department of the Prime Minister and Cabinet
- Te Rūnanga o Ngāi Tahu (the Iwi Authority for the rohe)
- Mahaanui Kurataiao Ltd (which represents the interests of the Papatipu Rūnanga who hold manawhenua rights and interests in the Greater Christchurch area)

In addition, 133 letters, together with a summary leaflet explaining the background and scope of the draft Proposed Change, were sent to landowners within the proposed FDAs.

The summary leaflet and a 'tracked changes' document showing the proposed amendments to Chapter 6 and Map A were made available on a web page set up for the consultation.

Feedback was invited on the draft Proposed Change and on the potential to use a Streamlined Planning Process, between Monday 29 July and Friday 16 August 2019.

A total of 17 written replies were received, as follows:

#### Central and local government

No feedback was received from Ministers or from territorial authorities outside of Greater Christchurch.

Responses were received from the three Greater Christchurch territorial authorities, being Waimakariri and Selwyn District Councils, and the Christchurch City Council (see below).

#### Greater Christchurch territorial authorities and other partners

Selwyn District Council and Waimakariri District Council provided feedback in support of the scope and content of the draft Proposed Change. The responses from both councils supported the use of a Streamlined Planning Process and referred to the need for the change to the CRPS to inform their District Plan Review processes currently underway and to give effect to the requirements of the NPS-UDC.

The response from the Christchurch City Council set out a number of comments to assist with the development of the draft Proposed Change, which are summarised in Table 6 below.

No feedback was received from the other Greater Christchurch Partnership agencies.

**Table 6 – Summary of points raised by territorial authorities during pre-notification consultation**

<b>Respondent</b>	<b>Summary of points raised</b>	<b>Council response</b>
Selwyn District Council (SDC)	<ul style="list-style-type: none"> <li>- Supports the Proposed Change as drafted and the request to use a Streamlined Planning Process.</li> <li>- Refers to the need for the Proposed Change to the CRPS to inform its District Plan Review process currently underway and to give effect to the requirements of the NPS-UDC.</li> <li>- Notes SDC modelling and analysis indicates a significant shortfall in residential capacity over the medium term and that, if flexibility to accommodate growth within Rolleston is not provided, the ability of the council to continue to provide affordable housing and choice – and to meet residential growth demands – will be significantly constrained.</li> <li>- Given the extent of consultation undertaken for Our Space, SDC supports consultation on the Proposed Change being limited to those affected and does not consider a hearing is necessary.</li> </ul>	Noted.
Waimakariri District Council (WDC)	<ul style="list-style-type: none"> <li>- Supports the Proposed Change as drafted and the request to use a Streamlined Planning Process.</li> <li>- Refers to the need for the Proposed Change to the CRPS to inform its District Plan Review process currently underway and to give effect to NPS-UDC requirements.</li> </ul>	Noted.
Christchurch City Council (CCC)	- Suggests it might be helpful if the Proposed Change includes the minimum density of 12 households per hectare within the proposed FDAs committed to in Our Space.	A minimum density of 12 households per hectare within FDAs has already been agreed to by the Greater Christchurch Partnership councils in adopting Our Space and will be given effect to through district planning processes.
	- Suggests it might be helpful if the CRPS makes it clearer that additional	The Proposed Change includes changes to Map A which identifies the land likely

Respondent	Summary of points raised	Council response
	<p>capacity will only be provided to meet a medium-term shortfall; that an assessment as to whether Selwyn should be included in the Proposed Change should take place at a later stage and only if the next capacity assessment demonstrates a housing capacity shortfall; and that the determination of whether there is a housing shortfall should be based on the outcome of a Future Development Strategy (<b>FDS</b>) rather than monitoring.</p>	<p>to be required to meet housing demand over the medium (10 years) to long term (30 years) and enables SDC and WDC to zone additional land within FDAs where necessary to meet a medium-term shortfall against their housing targets. Future Housing and Business Capacity Assessments (<b>HBAs</b>) will need to demonstrate this shortfall. The response from SDC notes that its modelling and analysis indicates a shortfall in residential capacity over the medium term.</p> <p>As currently drafted, any housing shortfall will be determined against the housing targets (which are set through the FDS) and up to date HBA.</p> <p>As drafted, the Proposed Change would enable the District Councils to respond to demonstrated demand without requiring subsequent amendments to the CRPS. It also aligns with the direction provided by Our Space.</p>
	<ul style="list-style-type: none"> <li>- Suggests it would have been helpful if all submitters on Our Space were included in the pre-notification consultation on the Proposed Change.</li> </ul>	<p>Environment Canterbury identified landowners within the FDAs as being directly affected by the Proposed Change on the basis that their land is being identified for potential future development and development of that land will be affected by the Proposed Change.</p> <p>Other parties will have the opportunity to participate through written submissions when the Proposed Change is publicly notified.</p>
	<ul style="list-style-type: none"> <li>- Suggests it might be helpful for there to be a hearing as part of a Streamlined Planning Process.</li> </ul>	<p>The Minister for the Environment issued a Direction on 29 April 2020, setting out the process steps and timeframes the Council must follow when using the streamlined planning process to progress the Proposed Change. This process does not include a hearing.</p>

## Consultation with the Iwi Authority and Te Ngāi Tūāhuriri Rūnanga

In accordance with s32(4A) of the RMA, Environment Canterbury is required to summarise all advice concerning the Proposed Change received from iwi authorities under the relevant provisions of Schedule 1. Environment Canterbury is also required to summarise the response to that advice, including any provisions of the proposal that are intended to give effect to the advice.

Clause 3B of the RMA outlines the requirements for consultation with iwi authorities. Clause 4A of the RMA requires a local authority to provide a copy of a proposed plan to the iwi authorities consulted under Clause 3(1)(d) and allow adequate time and opportunity for the iwi authorities to consider the draft and provide advice on it. These sections enable an Iwi Authority to identify the resource management issues that are of concern to them, as well as providing guidance to the local authority on how these issues have been, or are to be, addressed.

Environment Canterbury met with staff at Te Rūnanga o Ngāi Tahu (the Iwi Authority) on 10 July 2019 to outline the draft Proposed Change and process for Schedule 1 RMA consultation.

On 26 July 2019 email correspondence was sent to Te Rūnanga o Ngāi Tahu inviting feedback on the draft Proposed Change under Schedule 1 (3) of the RMA. On 1 August 2019 email correspondence was sent to Mahaanui Kurataiao Ltd (which represents the interests of the Papatipu Rūnanga who hold manawhenua rights and interests in the Greater Christchurch area) inviting their views, and those of the Papatipu Rūnanga they represent, on the draft Proposed Change.

No feedback was received in response to the Schedule 1 consultation from either Te Rūnanga o Ngāi Tahu or Mahaanui Kurataiao Ltd.

In October 2019 Environment Canterbury invited feedback and advice from Te Rūnanga o Ngāi Tahu on the draft Proposed Change and sought advice on how best to engage rūnanga when the proposed change is notified. Mahaanui Kurataiao Ltd was also contacted in this regard. No written feedback was received.

The streamlined planning process directed by the Minister provides for further pre-notification consultation with Te Rūnanga o Ngāi Tahu (as the iwi authority) and Ngai Tūāhuriri (being a hapū of Ngai Tahu). In accordance with the Minister's Direction, Environment Canterbury undertook this consultation between 26 May and 16 June 2020.

Between 13 May 2020 and 4 June 2020 Environment Canterbury discussed the Proposed Change with Mahaanui Kurataiao by phone and provided (by email) copies of the draft Proposed Change to Chapter 6 and a document showing further changes to draft provisions the Council proposed to make to address the Minister's statement of expectations. Te Rūnanga o Ngāi Tahu was similarly provided copies of these documents. It was agreed that Mahaanui Kurataiao would lead on the engagement with Ngāi Tūāhuriri Rūnanga.

On 12 June 2020 Environment Canterbury received a letter from Te Ngāi Tū Ahuriri Rūnanga Inc. which raised particular concerns regarding the wording of Action 10 and other text within Our Space, which relate to opportunities for kāinga nohoanga within Greater Christchurch. Within the letter Te

Ngāi Tūāhuriri also acknowledges that the scope of the Proposed Change to Chapter 6 of the CRPS is limited to Action 9a in Our Space, and that accordingly the Proposed Change does not address any of the matters of importance or priority to the Rūnanga.

Te Ngāi Tūāhuriri Rūnanga expressed the view that significant barriers remain in the planning framework that prevent mana whenua from achieving kaitiakitanga on Māori owned land, and that Our Space and the associated Proposed Change to the CRPS do not address these barriers. The letter reiterates the need for these matters to be addressed in the forthcoming full review of the CRPS.

Environment Canterbury received an email on 12 June 2020 confirming that Te Rūnanga o Ngāi Tahu supports the position of Ngāi Tūāhuriri Rūnanga. No additional comments regarding the Proposed Change were received.

*How particular regard has been had to advice received on the draft Proposed Change*

Environment Canterbury recognises the importance of the issues raised by Te Ngāi Tūāhuriri and agrees that these go beyond the scope of the Proposed Change to Chapter 6 of the CRPS.

This is a targeted change to Chapter 6 to implement the growth strategy in Our Space and enable the Greater Christchurch councils to give effect to direction in the NPS-UD 2020 to ensure sufficient development capacity over the medium and long term. A more comprehensive review of Chapter 6 is due to begin in 2021 as part of the scheduled full review of the CRPS.

The Council is committed to working with Te Rūnanga o Ngāi Tahu, Mahaanui Kurataiao and Ngā Papatipu Rūnanga, on resource management issues of significance to tāngata whenua through the forthcoming full review of the CRPS.

The matters raised by Te Ngāi Tūāhuriri Rūnanga regarding the existing planning framework have been shared with relevant staff at Environment Canterbury working on the review. The Council has also engaged Mahaanui Kurataiao to review the issues and outcomes associated with kāinga nohoanga and papakāinga provisions within District Plans, and the effectiveness of the provisions of the CRPS in providing direction to the territorial authorities in this regard. This will be a key piece of work that will inform the CRPS review going forward.

We note that Te Ngāi Tūāhuriri Rūnanga and Waimakariri District Council also wrote to the Minister for the Environment setting out their understanding of the context of the Proposed Change to the CRPS, their shared view of its merits, and resolve to progress related matters that are a priority for both parties. The letter states that, while Te Ngāi Tūāhuriri Rūnanga has no objection to the progression of the Proposed Change, it does express frustration at the rate of progress being made in addressing provision for kāinga nohoanga in areas such as Maori Reserve 873. The letter records the commitment of Waimakariri District Council to an active programme of work in this regard. Waimakariri District Council believes it can, by working in partnership with Te Ngāi Tūāhuriri Rūnanga, make substantial adjustment to the planning framework for MR873 and in its 2021-31 Long Term Plan, (in advance of the CRPS review), to ensure the planning and infrastructure servicing framework for realising shared kāinga nohoanga aspirations are materially progressed.

## Landowners

Twelve responses were received on behalf of landowners within the proposed FDAs. The key points raised are summarised in Table 7 below.

Two further responses were received on behalf of parties who own or hold an interest in land outside the proposed FDAs and were not included in this Schedule 1 consultation. These two responses are summarised separately in Table 7.

**Table 7 – Summary of points raised by landowners during pre-notification consultation**

<b>Respondent</b>	<b>Summary of points raised</b>	<b>Council response</b>
Landowners within proposed Future Development Areas (12 responses)	<ul style="list-style-type: none"> <li>- Majority supported the identification of the FDAs and the principle of the Proposed Change. Many noted the need for additional residentially zoned land.</li> <li>- No responses opposed the Proposed Change in its entirety, although a number sought amendments to the draft provisions (see below).</li> <li>- One response did not support the proposed amendments to Map A or the division of future residential development into 'Greenfield Priority Areas' and 'Future Development Areas'. The response considers that distinction of these two types of residential development is unnecessary and contradicts Policy 6.3.12.</li> <li>- Some sought immediate rezoning and/or the inclusion of their land as a Greenfield Priority Area.</li> <li>- One response identified additional land in Rangiora that they felt should be considered for rezoning in the future.</li> <li>- Two responses noted the loss of the 'rural feel' of their properties due to the proximity and impacts of urban development.</li> <li>- One response sought to ensure land does not become landlocked and retains rural rating status.</li> <li>- Various amendments to policies sought, including to provide additional references to the NPS-UDC and to be consistent with and give</li> </ul>	<p>Many of the suggested changes to provisions are outside the scope of the Proposed Change, do not align with the direction provided by Our Space, or are more appropriately considered as part of the full review of the CRPS, and have therefore not been incorporated as changes.</p> <p>Some amendments have been made in response to the comments received, including changes to wording to better align with the NPS-UD and to clarify the date of the scheduled full review of the CRPS.</p> <p>The Minister for the Environment issued a Direction on 29 April 2020, setting out the process steps and timeframes the Council must follow when using the streamlined planning process to progress the Proposed Change.</p>

Respondent	Summary of points raised	Council response
	<p>effect to the NPS-UDC, and to remove the requirement for a 'collaborative approach' to the HBA.</p> <ul style="list-style-type: none"> <li>- Amendments sought to policies and explanations to be consistent with Our Space actions, including commitment to notification of the full review of the CRPS in 2022.</li> <li>- Some sought the addition of a new policy that provides flexibility to accommodate development in other locations / circumstances.</li> <li>- One response expressly supported the use of a Streamlined Planning Process.</li> <li>- One response supported a Streamlined Planning Process if this provides for public submissions and the opportunity to appear before a hearings panel.</li> <li>- The majority of responses (10) did not comment specifically on the potential use of a Streamlined Planning Process. However, of these respondents, four indicated support for making the changes to the CRPS expediently.</li> </ul>	
<p>Landowners outside proposed Future Development Areas (2 responses)</p>	<ul style="list-style-type: none"> <li>- Sought the inclusion of additional land at Rangiora and Prebbleton as FDAs on Map A.</li> <li>- Sought various amendments to policies to provide additional references to the NPS-UDC and to be consistent with and give effect to the NPS-UDC.</li> <li>- Sought various amendments to policies and explanations to be consistent with Our Space actions, including commitment to notification of the full CRPS review in 2022.</li> <li>- Suggested the addition of a new policy that provides flexibility to accommodate development in other locations / circumstances.</li> </ul>	<p>These parties were not directly consulted during pre-notification consultation, as they do not own land within the proposed FDAs.</p> <p>This is a targeted change to Chapter 6 to implement the urban growth strategy set out in Our Space and give effect to the NPS-UD. The inclusion of other/additional land within Map A is outside the scope of the Proposed Change. As per the recommendations of the Hearing Panel for Our Space, this is more appropriately considered as part of the full review of the CRPS (which will occur by way of a standard Schedule 1 process, including hearings).</p> <p>Many of the other suggested changes to provisions are outside the scope of the Proposed Change, do not align with the direction provided by Our Space, or are</p>

Respondent	Summary of points raised	Council response
	<ul style="list-style-type: none"> <li>- Supported the use of a standard Schedule 1 process (not a Streamlined Planning Process).</li> </ul>	<p>more appropriately considered as part of the full review of the CRPS, and have therefore not been incorporated as changes.</p> <p>Some amendments have been made in response to the comments received, including changes to wording to better align with the NPS-UD and to clarify the date of the scheduled review of the CRPS.</p>

## 6. Method of evaluation

The evaluation carried out by Environment Canterbury to meet the requirements of section 32 of the RMA:

- identifies the purpose of the Proposed Change and examines the extent to which that purpose is appropriate for achieving the purpose of the RMA; and
- examines the extent to which the Proposed Change is appropriate for achieving relevant objectives of the CRPS and the purpose of the Proposed Change, including by:
  - identifying other reasonably practicable options for achieving the purpose of the Proposed Change and relevant CRPS objectives (s32(1)(b)(i));
  - examining the efficiency and effectiveness of the proposed provisions for achieving purpose of the Proposed Change and relevant CRPS objectives (s32(1)(b)(ii));
  - providing an overall evaluation summary of the reasons for deciding on the proposed provisions (s32(1)(b)(iii)); and
  - using a level of detail in the assessment that corresponds with the scale and significance of the effects anticipated from the implementation of the proposed provisions (s32(1)(c)).

The full text of section 32 is set out in Appendix 4.

The evidence base which supported Our Space has informed the preparation of this section 32 report and has assisted in the analysis undertaken. A full list of the technical reports and other information that has informed the Proposed Change is included in Appendix 5 of this report.

### 6.1 Approach to efficiency and effectiveness assessments

The terms 'efficiency' and 'effectiveness' are not defined in the RMA. For the purpose of this evaluation, 'efficiency' is broadly interpreted to mean the provisions that will achieve the CRPS objectives and the purpose of the Proposed Change at the lowest overall cost to the regional community. 'Effectiveness' is interpreted as how successfully the provisions will achieve the CRPS objectives and the purpose of the Proposed Change.

The assessment of the efficiency and effectiveness of the Proposed Change relates to both the achievement of the CRPS objectives and the purpose of the Proposed Change. While all the objectives must be considered, some are more relevant than others to the evaluation of the proposed provisions. For assessment purposes, both efficiency and effectiveness are therefore assessed against the objectives of particular relevance to the proposed provisions.

The efficiency and effectiveness assessment must also identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including expected changes to economic growth and employment opportunities (section 32(2)(a)). Where practicable, costs and benefits should be quantified (section 32(2)(b)).

When evaluating benefits and costs, the starting point used is the current environment and the policy framework of the CRPS. This approach means that the identified costs and benefits of the proposed change are a comparison against the status quo. While section 32 of the RMA does not explicitly require alternative options to be assessed with respect to their effectiveness or efficiency in achieving CRPS objectives and the purpose of the Proposed Change, this approach does enable a comparative assessment of the available options against the status quo and the proposed provisions.

## **6.2 Scale and significance**

Section 32(1)(c) requires that the section 32 evaluation report must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The scope of the Proposed Change is narrow. This is a targeted change to Chapter 6 that will implement the urban growth strategy set out in Our Space and give effect to the NPS-UD. A more comprehensive review of Chapter 6 is due to commence in 2021 as part of the full review of the CRPS. In terms of geographic scale, the quantum of land affected is not significant in a Greater Christchurch context, is well defined, and aligns with established growth strategies including the CRPS, being within the existing PIB shown on Map A. The rezoning of land within the proposed FDAs will be considered by Selwyn District Council and Waimakariri District Council as part of their district planning processes.

Environment Canterbury has identified Te Rūnanga o Ngāi Tahu – the iwi authority for the rohe, Selwyn and Waimakariri District Councils, and landowners within the proposed FDAs as likely to be directly affected by the Proposed Change.

Overall, it is considered that the scale and significance of the Proposed Change is low-medium. The level of detail contained in the evaluation section of this report reflects the scale and significance of the likely effects of the changes proposed.

## 7. Evaluation

### 7.1 Section 32(1)(a) examination of the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA

The RMA requires an examination of whether the objectives of the Proposed Change being evaluated are the most appropriate way to achieve the purpose of the Act<sup>26</sup>. As the Proposed Change does not contain an objective, the objective of the Proposed Change to be evaluated is the purpose of the Proposed Change.<sup>27</sup>

The purpose of the Proposed Change is to:

- a. Give effect to Policy 2 and Clause 3.7 of the NPS-UD and enable sufficient land in Greater Christchurch to be zoned for the medium term (10 years) and identified for the long term (30 years) to meet the needs of existing and future communities, by identifying and enabling additional development capacity for housing in greenfield growth areas within the Projected Infrastructure Boundary shown on Map A in Chapter 6 of the CRPS, in Rolleston, Rangiora and Kaiapoi; and
- b. Provide flexibility for Selwyn and Waimakariri District Councils to consider rezoning land within the Projected Infrastructure Boundary to meet medium term housing demands as part of their district planning processes, where a sufficiency shortfall is identified through a housing development capacity assessment.

The purpose of the RMA is to promote the sustainable management of natural and physical resources.

Sustainable management is defined as *“managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—*

*(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*

*(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*

*(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

The purpose of the Proposed Change will promote the sustainable management of natural and physical resources by:

- Enabling people and communities to provide for their social, economic and cultural wellbeing through development, by ensuring the Selwyn and Waimakariri District Councils can:

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<sup>26</sup> RMA s32(1)(a)

<sup>27</sup> RMA s32(6)

- enable urban environments to grow and change in response to the changing needs of communities and future generations; and
- provide enough space for their populations to happily live and work, both through allowing development to go “up” by intensifying existing urban areas, and “out” by releasing land in appropriate greenfield areas.
- Directing additional capacity to areas within the PIB in the key towns of Rolleston, Rangiora and Kaiapoi and promoting a settlement pattern that aligns with current growth management strategies and a consolidation approach to urban development that is more sustainable than is likely to result from a more laissez faire scenario by:
  - Promoting a compact and strongly connected urban form
  - Limiting expansion onto rural and productive soils
  - Reducing the need to travel and maximising public transport efficiencies
  - Promoting the efficient use of infrastructure, which aligns with territorial authority planning and funding
  - Promoting the integration of land use / development and infrastructure.
- Progressing a change to the CRPS to achieve outcomes that have been collaboratively developed and subject to public consultation through previous strategic spatial planning processes.
- Implementing Greater Christchurch’s settlement pattern principles, reflected in the UDS, Our Space and the CRPS, which seek to consolidate development in and around well-defined urban and rural town centres and promote a sustainable urban form that protects the natural environment, rural character and versatile soils.
- Giving effect to national direction (NPS-UD) developed under the RMA.

## **7.2 Section 32(1)(b) examination of whether the provisions in the proposal are the most appropriate way to achieve the objectives of the CRPS and the purpose of the Proposed Change**

Section 32(1)(b) of the RMA requires an examination of whether the provisions of the Proposed Change are the most appropriate way of achieving the objectives of the CRPS<sup>28</sup>. The evaluation must assess whether the new provisions will help achieve the objectives already in the CRPS and will not undermine them<sup>29</sup>. For an amending proposal the examination must also consider if the provisions are the most appropriate way to achieve the purpose of the Proposed Change.<sup>30</sup> This evaluation is set out in the following sections of this report.

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<sup>28</sup> RMA s32(1)(b) and RMA s32(3)(b)

<sup>29</sup> Ministry for the Environment, A guide to section 32 of the RMA, 2017

<sup>30</sup> RMA s32(3)

## 7.2.1 Section 32(1)(b)(i) identification of reasonably practicable options

### Screening of options

Through collaboration with partner councils and reviewing public feedback received through consultation on Our Space a range of options for achieving the purpose of the Proposed Change were identified. Two of these options were taken forward for evaluation (Options 1 and 2 below). Options 3-7 were discounted earlier in the policy development process. These alternative options were not considered reasonably practicable for a range of reasons, including that they would be unlikely to achieve the purpose of the Proposed Change or the objectives of the CRPS.

Table 8 below describes the options considered and summarises the initial high level assessment undertaken for each.

**Table 8 – Options considered**

Option		Summary of assessment
1	<i>Status Quo (Do not progress a change to the CRPS)</i>	Option 1 represents the status quo option. Map A and Chapter 6 remain unchanged. The Proposed Change would likely be considered further as part of the scheduled full review of the CRPS over the next four years. This option could therefore achieve the purpose of the Proposed Change and CRPS Objectives and give effect to the CRPS and NPS-UD, in due course. However, it would not be sufficiently progressed to enable Selwyn and Waimakariri District Councils to respond to identified shortfalls in housing development capacity in a timely manner, including through their respective district plan review processes currently underway.
2	<i>Modify Map A to identify land within the Projected Infrastructure Boundary in Rolleston, Rangiora and Kaiapoi as 'Future Development Areas' through a change to Chapter 6 ahead of the scheduled full review of the CRPS and include policy provisions to enable land within these areas to be rezoned to address medium term housing capacity shortfalls (proposed option)</i>	Option 2 is the approach set out in Our Space and the proposed option. The Proposed Change to Chapter 6 of the CRPS would identify on Map A land within the PIB in Rolleston, Rangiora and Kaiapoi as FDAs, to provide additional capacity for housing. It would enable land within these areas to be rezoned by Selwyn and Waimakariri District Councils in response to projected housing capacity shortfalls over the medium term (next 10 years). This would enable planning for urban development within the FDAs to take place in an integrated and coordinated manner through structure planning and district planning, including the review processes currently underway.

Option	Summary of assessment
	This option could achieve the purpose of the Proposed Change and CRPS Objectives.
<p>3 <i>Modify Map A as per option 2 and include policy provisions to enable land within the Future Development Areas to be rezoned to address long term housing capacity shortfalls</i></p>	<p>This option would enable land within the identified FDAs to be rezoned by the district councils to meet long term housing capacity shortfalls immediately (rather than on a rolling basis as per option 2). The reasons for ruling out this option as not being reasonably practicable are summarised below:</p> <ul style="list-style-type: none"> <li>• This option goes beyond the requirement of the NPS-UD and purpose of the Proposed Change to ensure 10 years zoned development capacity is enabled at any one time.</li> <li>• This option is unlikely to achieve the objectives of the CRPS which seek to promote consolidation and intensification of urban areas and the integration of transport infrastructure and land use. Future housing capacity assessments and the work being undertaken by the district councils to re-evaluate appropriate densities for greenfield areas and identify further opportunities for intensification will inform future decisions regarding the need to rezone additional greenfield land to meet long-term housing requirements.</li> </ul>
<p>4 <i>Modify Map A to identify land in Rolleston, Rangiora and Kaiapoi as additional 'Greenfield Priority Areas' through a change to Chapter 6 ahead of the scheduled full review of the CRPS.</i></p>	<p>Option 4 was identified and considered during early development of the draft provisions after being raised by submitters through public consultation on Our Space.</p> <p>This option would enable land within the identified areas to be rezoned by the District Councils immediately. The reasons for ruling out this option as not being reasonably practicable are summarised below:</p> <ul style="list-style-type: none"> <li>• The term 'Greenfield Priority Area' (GPA) is a product of the recovery timeframes associated with the LURP as distinct from the broader identification of greenfield areas located within the PIB. The GPAs were identified on Map A to provide for growth and residential relocation over the recovery period through to 2028.</li> <li>• At a territorial authority level, and once zoned for urban use in a district plan, the GPA term becomes largely redundant as</li> </ul>

Option	Summary of assessment
	<p>such land has a more detailed zoning description and rules package.</p> <ul style="list-style-type: none"> <li>• Nearly all GPA land on Map A has already been zoned in district plans.</li> <li>• The use of the term FDA is more appropriate to ensure sufficient, feasible development capacity for the period 2018-2048.</li> <li>• The land proposed to be identified collectively provides for more greenfield development capacity than is currently required in Greater Christchurch over the medium term. This option goes beyond the requirement of the NPS-UD and purpose of the Proposed Change to ensure 10 years zoned development capacity is enabled at any one time.</li> <li>• The sequencing of future development capacity is particularly important to ensure that land use decisions are integrated with the provision of new infrastructure to service such capacity.</li> <li>• District plan processes are best placed to consider appropriate sequencing and zoning of land for urban use, if enabled to do so through a change to the CRPS.</li> </ul>
<p>5</p> <p><i>Modify Map A to identify additional greenfield land only in response to demonstrated medium term (10 year) housing sufficiency shortfalls.</i></p>	<p>Option 5 was identified and considered during early development of the draft provisions and was further considered after it was raised in a response to pre-notification consultation on the Proposed Change.</p> <p>The reasons for ruling out this option as not being reasonably practicable are summarised below:</p> <ul style="list-style-type: none"> <li>• The NPS-UD requires Tier 1 councils to ensure that at any one time at least 10 years zoned development capacity is enabled, and 30 years development capacity is identified (Policy 2, and Part 3, sub-part 1, clause 3.4(1)).</li> <li>• This option would potentially require Map A to be updated through changes to the CRPS on a rolling basis (every three years) as new capacity assessments and future development strategies are undertaken and reviewed. This is not considered to be an efficient use of resources.</li> </ul>

Option	Summary of assessment
	<ul style="list-style-type: none"> <li>• Compared to option 2, this option provides less certainty to landowners and local communities in terms of where future urban growth will be directed.</li> <li>• This option would limit the ability for Selwyn District Council and Waimakariri District Council to undertake strategic planning for long-term housing demands through their structure planning and District Plan Review processes that are currently underway. Option 2 provides greater flexibility for the District Councils to consider how and where to plan for urban growth and development.</li> </ul>
<p>6 <i>Advance a new greenfield growth area in other or additional locations.</i></p>	<p>Option 6 was identified and considered through the development of Our Space and during early development of the draft provisions. A number of submitters on the draft Our Space document sought to have additional areas identified for future residential development.</p> <p>The reasons this option was ruled out as not being reasonably practicable are summarised below:</p> <ul style="list-style-type: none"> <li>• The proposed greenfield growth areas in Rolleston, Rangiora and Kaiapoi are consistent with the long-term growth strategy set out in the CRPS (being within the PIB), the UDS, and the recently adopted FDS. These areas have been identified for future urban growth since 2007 and have been the subject of spatial planning and infrastructure planning by the District Councils.</li> <li>• The options assessment carried out as part of the development of Our Space concluded that the urban form directions contained in the UDS, CRPS and district plans remain relevant<sup>31</sup>.</li> <li>• The Hearings Panel on Our Space concluded that additional land is not necessary to demonstrate sufficient, feasible development capacity in the medium and long term for Greater Christchurch. They concluded further that, based on the evidence available to them,</li> </ul>

<sup>31</sup> Greater Christchurch Settlement Pattern Update – Options Assessment report (version 1), page 3.

Option	Summary of assessment
	<p>they did not consider that the additional land proposed by submitters is preferable to that identified in Our Space which has previously been considered by the Greater Christchurch Partnership and is consistent with the strategic directions of the UDS and CRPS to promote a consolidated urban form in Greater Christchurch, and aligns with infrastructure servicing arrangements outlined in Long Term Plans and infrastructure strategies<sup>32</sup>.</p> <ul style="list-style-type: none"> <li>• The scope of the Proposed Change is narrow. It is a targeted change to the CRPS in response to a shortfall in housing development capacity over the medium to long term. Additional land is best considered as part of subsequent planning processes, including reviews of the CRPS and district plans and relevant LGA processes, including structure planning.</li> </ul>
<p>7 <i>Remove Map A from Chapter 6 and / or introduce greater flexibility to where urban development can locate through amendments to relevant objectives and policies.</i></p>	<p>Option 7 was identified and considered through the development of Our Space and during early development of the draft provisions of the Proposed Change.</p> <p>The reasons this option was ruled out as not being reasonably practicable are summarised below:</p> <ul style="list-style-type: none"> <li>• The purpose of the Proposed Change is to address the shortfall in housing development capacity over the medium and long term. Wider policy changes, such as Option 7, go far beyond addressing the projected housing shortfall.</li> <li>• The Hearings Panel for Our Space accepted the position of the reporting officers that it is appropriate to consider such matters as part of the scheduled full review of the CRPS. They noted that the changes sought by submitters in this regard would provide significantly less certainty for investment as to where land is appropriate to develop, and increase the likelihood of fragmentation of that land, potentially resulting in less ability to</li> </ul>

<sup>32</sup> Our Space 2018-2048: Greater Christchurch Settlement Pattern Update, Whakahāngai O Te Hōrapa Nohoanga, Report and Recommendations of the Hearing Panel incorporating Addendum dated 5 June 2019, paras. 180 and 181, page 47.

Option	Summary of assessment
	properly structure plan and develop that land for urban activities at a later date <sup>33</sup> .

### Reasonably practicable options

Through this initial screening exercise, two reasonably practicable options to address the purpose of the Proposed Change were identified as follows:

#### **Option 1: Status Quo**

Under this option, Map A and Chapter 6 would remain unchanged until the scheduled full review of the CRPS.

Map A in Chapter 6 identifies the location and extent of urban development to support earthquake recovery, rebuilding and planning for future growth and infrastructure delivery. This includes the identification of the Projected Infrastructure Boundary, the Existing Urban Area and Greenfield Priority Areas for residential and business development. The existing urban area and priority areas were identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028<sup>34</sup>.

Map A is supported by objectives and policies that enable development within the Existing Urban Area and Greenfield Priority Areas and steer new urban activities to these areas, unless they are otherwise expressly provided for in the CRPS. There is little ability for land outside of the areas shown on Map A to be rezoned for urban development through private plan changes or district plan review processes.<sup>35</sup> A change to the CRPS would therefore be needed before land within the proposed FDAs (which are situated within the PIB but outside the Existing Urban Area and Greenfield Priority Areas identified on Map A) could be rezoned in Waimakariri and Selwyn District Councils' District Plans to provide for housing development.

Under Option 1, amendments to Map A and Chapter 6 necessary to provide for urban development within the FDAs, would be considered as part of the scheduled full review of the CRPS. The review is due to commence in the financial year 2021, with notification currently scheduled for 2023.

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<sup>33</sup> Our Space 2018-2048: Greater Christchurch Settlement Pattern Update, Whakahāngai O Te Hōrapa Nohoanga, Report and Recommendations of the Hearing Panel incorporating Addendum dated 5 June 2019, para. 181, page 80.

<sup>34</sup> Chapter 6 provides for growth to 2028 due to the timeframes of the recovery legislation under which Chapter 6 was inserted into the CRPS.

<sup>35</sup> The NPS-UD (Policy 8) requires local authorities to be responsive to out of sequence or unplanned development proposals that add significantly to capacity and contribute to well-functioning urban environments. Environment Canterbury, in collaboration with Greater Christchurch Partnership organisations, is preparing a responsive planning policy (to be advanced through a separate RMA process) to implement Part 3, subpart 2, clause 3.8(3) of the NPS-UD. This will insert criteria into the CRPS for determining what plan changes will be treated, for the purpose of implementing NPS-UD Policy 8, as adding significantly to development capacity.

Waimakariri and Selwyn District Councils would be largely unable to rezone land within the proposed FDAs to provide additional capacity for housing as part of district planning processes, including their current district plan reviews.

## **Option 2: Proposed Change to Chapter 6**

This option aligns with the strategy and direction set out in Our Space<sup>36</sup>. Map A would be modified to identify additional land within the PIB at Rolleston, Rangiora and Kaiapoi as FDAs through a targeted change to Chapter 6 ahead of the scheduled full review of the CRPS. New policy provisions would enable land within these FDAs to be rezoned by the Selwyn and Waimakariri District Councils, if required, to meet their medium-term housing needs.

The following amendments to the operative CRPS are proposed:

- Amend Map A in Chapter 6 to identify FDAs in Rolleston, Rangiora and Kaiapoi as shown in Figure 15 of Our Space.
- Insert a new policy (Policy 6.3.12), to enable land within these FDAs to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs.
- Make consequential changes to objectives, policies, text within Chapter 6 and the Definitions for Greater Christchurch, summarised below. The exact wording changes can be found in the document titled Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement.
  - Objective 6.2.2 – amendment to add references to FDAs and new Policy 6.3.12.
  - Policy 6.3.1 – amendment to Principal reasons and explanation to make clear that new residential development is provided for within FDAs, where the circumstances set out in Policy 6.3.12 are met.
  - Policy 6.3.3 – amendment to Policy and methods to add references to FDAs.
  - Policy 6.3.5 – amendment to add reference to FDAs.
  - Policy 6.3.7 – amendment to add reference to Policy 6.3.12 and amendments to reflect that the greenfield areas to be identified on Map A are intended to provide for growth to 2048, in accordance with the requirements of the NPS-UD. Amendment to principal reasons and explanation to add reference to FDAs.
  - Policy 6.3.9 – amendment to add reference to FDAs.
  - Policy 6.3.11 – amendments to refer to the requirements of the NPS-UD.
  - Definitions for Greater Christchurch – new definitions added for ‘Development capacity’, ‘Feasible’, ‘Future Development Areas’, ‘Housing and business capacity assessment’, ‘Long term’, ‘Medium term’, ‘Sufficient’. Amendments to definitions for ‘Outline development plan’ and ‘Urban activities’, to refer to FDAs.

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<sup>36</sup> See Section 5.3, 5.4, and Action 9a in the Schedule of Further Work in Our Space, to make a change to Chapter 6 of the CRPS to modify Map A to identify the FDAs and enable Selwyn and Waimakariri District Councils to rezone land within these areas, if required to meet their medium-term (ten-year) housing demands.

The FDAs are expected to provide sufficient additional residential development capacity to ensure population and household growth in Selwyn and Waimakariri Districts over both the medium (ten years) and long term (thirty years)<sup>37</sup> can be accommodated<sup>38</sup>.

The Proposed Change provides a planning framework that will enable the Greater Christchurch Councils to respond to medium and long term growth needs.

Not all of the land within the FDAs would be released for urban development immediately. A proposed new Policy 6.3.12 would enable land within these areas to be rezoned by Waimakariri and Selwyn District Councils in response to projected shortfalls in housing capacity to meet their medium term housing targets<sup>39</sup>. Housing and business development capacity assessments, which the NPS-UD requires local authorities to undertake at least every three years, in time to inform long term plans, will provide a clear evidence base for understanding the amount of feasible development capacity that has been enabled and what additional capacity is required.

The new policy will sit within the existing objective and policy framework of the CRPS. Existing objectives and policies, including those related to transport effectiveness, land use and transport integration, outline development plans, and natural hazards, would similarly apply to urban development in FDAs.

Development within the FDAs will be staged and released in accordance with the CRPS, local growth management strategies and District Plan growth and policy direction. Outline development planning is one of the main methods set out in the CRPS to ensure the required detailed planning is undertaken within identified growth areas.

In his Direction, the Minister for the Environment sets out the following expectation for Environment Canterbury in undertaking the streamlined planning process:

*a. Include in the proposed change policy direction for the Future Development Areas to provide higher density living environments, including mixed use developments and a greater range of housing types, and enables the efficient provision and use of network infrastructure.*

To address the Minister's expectation, give effect to national direction in the NPS-UD and contribute towards the achievement of CRPS objectives, the proposed policy provisions require that development within any FDAs promotes the efficient use of urban land, provides opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types, and supports the efficient provision and use of network infrastructure.

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<sup>37</sup> The NPS-UD requires the Greater Christchurch councils to ensure at least ten years of zoned development capacity is enabled, and thirty years of development capacity is identified, within Greater Christchurch (Policy 2).

<sup>38</sup> Based on the findings of the 2018 Greater Christchurch Housing and Business Capacity Assessment.

<sup>39</sup> In accordance with the NPS-UDC 2016, the CRPS (Objective 6.2.1a) sets out targets for housing development capacity for Greater Christchurch to 2048. The territorial authority apportionment of the regional targets is also reflected in the Christchurch City, Waimakariri and Selwyn District Plans.

The proposed provisions do not specify a minimum density requirement for the FDAs. The inclusion of a minimum density requirement (for example 12 or 15 households per hectare) was considered during development of the draft provisions and further in response to pre-notification consultation feedback and in the light of the Minister's expectation. However, this was ruled out as not being reasonably practicable primarily because the evidence base is not yet sufficiently advanced. The Greater Christchurch Partnership is working collaboratively to review the appropriateness of existing minimum densities specified in the CRPS to inform district planning and the review of the CRPS. A method to this effect has been included in the proposed provisions. Until this work is complete, Our Space sets out that new urban housing in FDAs should achieve a minimum net density of 12 households per hectare. This is a 20 per cent increase on current density requirements for greenfield locations in Selwyn and Waimakariri Districts.

### **7.2.2 Efficiency and effectiveness assessment**

Section 32(1) requires an examination of whether the provisions in the Proposed Change are the most appropriate way to achieve the purpose of the Proposed Change and the relevant objectives of the CRPS by assessing the efficiency and effectiveness of the provisions in achieving the purpose of the Proposed Change and objectives of the CRPS.

This assessment must identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposed provisions. The following table identifies and assesses those benefits and costs, including the opportunities for economic growth and employment that are anticipated to be provided or reduced.

The evaluation undertaken is a comparative assessment of the proposed provisions (Option 2) against the status quo (Option 1).

As the CRPS does not rezone land there are few direct benefits and costs arising from the Proposed Change and it is not practicable to quantify those benefits and costs. However, the Proposed Change will enable land within the FDAs to be rezoned in District Plans for urban development (housing). The evaluation therefore considers, at a high level, the likely costs and benefits associated with the anticipated change in land use from rural to urban (housing). This level of detail corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the Proposed Change.

In carrying out this evaluation regard has also been had to the Integrated Planning Guide<sup>40</sup>. This has helped to identify potential health, wellbeing and sustainability impacts of the Proposed Change.

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<sup>40</sup> Health in All Policies Team, Community and Public Health (2019). *Integrated Planning Guide for a healthy, sustainable and resilient future*. Christchurch, New Zealand: Canterbury District Health Board.

**Table 9 – Evaluation of benefits and costs**

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
<b>Environmental benefits and costs</b>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Potential environmental benefits associated with the status quo option include: <ul style="list-style-type: none"> <li>- preservation of productive rural soils if further greenfield expansion is prevented</li> <li>- restricting greenfield opportunities could potentially encourage greater consolidation through additional housing within the existing urban areas, thereby promoting more efficient use of land and infrastructure, reducing the need to travel, maximising public transport opportunities, and encouraging transport mode shift and reduced emissions</li> <li>- fewer potential reverse sensitivity issues are likely to arise associated with urban development in productive rural environments if further greenfield expansion is prevented</li> </ul> </li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• The evidence base underpinning Our Space indicates that the quantum of available development capacity enabled by the current CRPS framework is likely to be insufficient to meet Waimakariri District Council’s medium term housing targets and Selwyn District Council’s long term</li> </ul>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• The proposed FDAs are located on the fringes of the existing townships at Rolleston, Rangiora and Kaiapoi. Option 2 aligns with urban consolidation objectives and promotes a compact urban form, which is likely to have the following environmental benefits: <ul style="list-style-type: none"> <li>- higher densities help to promote more efficient use of land resources</li> <li>- encroachment of urban development into rural areas / on productive soils is managed</li> <li>- sites can be integrated with existing development, and wastewater, stormwater and drinking water infrastructure is planned for and identified in Long Term Plans</li> <li>- public transport opportunities can be maximised</li> <li>- the need to travel is reduced</li> <li>- fewer potential reverse sensitivity issues are likely to arise associated with urban development in productive rural environments</li> <li>- the likelihood of piecemeal development and land fragmentation in rural areas is reduced</li> </ul> </li> </ul>

<p><b>Benefits and Costs</b></p>	<p><b><i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i></b></p>	<p><b><i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i></b></p>
	<p>housing targets. There is a risk of increased pressure on rural / productive land from unplanned expansion if there is a real or perceived undersupply of residential development capacity. Councils could come under pressure to accept rezoning applications to enable development in alternative and / or more remote locations with potentially greater associated environmental costs (e.g. loss of productive soils, fragmentation of rural / productive land, loss of rural character, increased infrastructure and transport impacts, impacts on special features and landscape values etc).</p> <p><b>Overall environmental impact</b></p> <p>The potential environmental benefits of the status quo option are primarily associated with directing future urban growth within existing urban areas, rather than in greenfield locations. The likely environmental costs of not progressing a change to Chapter 6 relate to the potential risk of increased pressure on areas from unplanned expansion if councils are unable to demonstrate sufficient development capacity to meet their housing targets.</p>	<ul style="list-style-type: none"> <li>- there are no outstanding natural features and landscapes within the proposed FDAs.</li> <li>• Option 2 directs future housing growth to existing townships with planned public transport upgrades and which are accessible to mix of transport options.</li> <li>• Identifying sufficient capacity over the medium and long term is likely to result in less pressure from unplanned expansion onto rural land / productive soils.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• Some of the land within the proposed FDAs comprises versatile soils - approximately 360 hectares of land (39%) is identified on Canterbury Maps as Land Use Capability Class 2 using the New Zealand Land Resource Inventory data set from Manaaki Whenua Landcare Research. The loss of productive rural land represents a potential environmental cost. However, the FDAs align with the existing growth strategies and have been subject to spatial planning exercises by Selwyn and Waimakariri District Councils as part of considering future development within the PIB over many years. In this context, the appropriateness of these areas for future development has been extensively considered as part of multi-criteria analysis in previous processes. In rezoning land within the proposed FDAs, it will be necessary for the councils to consider the</li> </ul>

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		<p>implications of the new National Policy Statement for Highly Productive Land (NPS-HPL), when it is released.</p> <ul style="list-style-type: none"> <li>• Transport modelling undertaken as part of the Settlement Pattern Update examined the extent to which the location of growth has an impact on the transport network. The modelled scenarios for Greater Christchurch all showed that population growth could result in some significant increases in traffic and travel demand in the sub-region during the next thirty years<sup>41</sup>. Projected housing and business growth will result in more trips on the transport network, including commuter flows from the districts into Christchurch City, leading to more congestion and longer journey times if travel behaviours do not change<sup>42</sup>. To mitigate this, a priority for the Settlement Pattern Update and the Proposed Change was to ensure that future development is appropriately aligned with and informs long term transport planning and investment in Greater Christchurch. Improvements to public transport services and infrastructure, along with the associated demand management and road pricing are being considered as</li> </ul>

<sup>41</sup> Greater Christchurch Urban Development Capacity Assessment, Housing and Business Interactions, Greater Christchurch Partnership, March 2018 (ref. Table 3.5, page 33).

<sup>42</sup> Further information and an explanation of the transport modelling undertaken is set out in the Greater Christchurch Urban Development Capacity Assessment, Housing and Business Interactions, prepared by the Greater Christchurch Partnership, March 2018 (ref. pp 27-35).

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<b>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</b>
		<p>part of transport planning and development of business cases. Further and detailed consideration will be given to the integration of land use and transport through structure planning and other district plan processes over the next 30 years, including downstream transport impacts attributed to commuter flows, as land within the FDAs comes forward for development.</p> <ul style="list-style-type: none"> <li>• There will likely be a prolonged period of land use change associated with development within the FDAs, with potential effects including dust, visual effects, noise, light glare, vibration etc. However, such effects should be appropriately managed through district plan requirements and consenting.</li> </ul> <p><b>Overall environmental impact</b></p> <p>Some potential negative environmental effects, for example the loss of productive soils and potential transport impacts, have been identified. The encroachment onto productive soils in the areas identified is mitigated by the availability of high quality, productive land elsewhere in Greater Christchurch. Further, Option 2 would ensure that urban expansion occurs only on land that has already been identified in long term growth strategies. In rezoning land within the proposed FDAs, it will be necessary for the councils to consider the implications of the new NPS-HPL, when it is released. Transport impacts would be managed under the existing CRPS</p>

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		objective and policy framework, in particular Policies 6.3.3, 6.3.4 and 6.3.5, which relate to the integration of land use and transport, and through the alignment of future development with long term transport planning and investment in Greater Christchurch (including the Canterbury Regional Public Transport Plan). The proposed provisions would enable housing growth to be provided for in a coordinated way and the staging and timing of future development managed to ensure transport and other infrastructure planning is integrated with the provision of additional housing. The proposed FDAs advance the consolidation objectives of the CRPS and UDS, and the efficient integration of infrastructure. Additional pressures on water resources, including its availability to service expanding urban areas, will be considered in detail through district planning and Long Term Plan processes.
Social benefits and costs	<b>Benefits</b> <ul style="list-style-type: none"> <li>• There are no significant social benefits arising from not amending the CRPS. There may be potential social benefits to landowners and residents who value and wish to preserve a rural outlook and lifestyle on the fringes of these townships. However, these locations have been identified for future growth for many years and the eventual urbanisation of these areas would likely have been anticipated.</li> </ul>	<b>Benefits</b> <ul style="list-style-type: none"> <li>• The Proposed Change will enable the District Councils to provide for the housing needs of their communities by reducing the risk of undersupply. Housing is a significant determinant of health and social wellbeing. Ensuring housing supply keeps pace with population growth reduces the risk of adverse effects on housing affordability, housing choice, and negative health and wellbeing consequences associated with a lack of suitable</li> </ul>

<p><b>Benefits and Costs</b></p>	<p><i><b>Option 1 - Status Quo (Do not progress a change to the CRPS)</b></i></p>	<p><i><b>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</b></i></p>
	<p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• The evidence base underpinning Our Space indicates that the quantum of available development capacity enabled by the current CRPS framework is likely to be insufficient to meet Waimakariri District Council’s medium term housing targets and Selwyn District Council’s long term housing targets. Under Option 1, Selwyn and Waimakariri District Councils would be unable to respond to shortfalls in the sufficiency of housing development capacity to meet the needs of their communities over the medium to long term, if required, through their District Plan Review processes currently underway. An undersupply of housing has associated negative social impacts attributed to reduced housing affordability and choice, and associated effects on health and wellbeing.</li> <li>• Unplanned expansion in other locations could result in housing development that is less well connected to existing townships, and where infrastructure has not been comprehensively planned for, which could have resultant negative social impacts (for example access to schools, health centres and other community facilities, and isolation / reduced community cohesion).</li> </ul> <p><b>Overall social impact</b></p> <p>The greatest social impacts likely to arise from not progressing a change to Chapter 6 relate to the potential that the Greater</p>	<p>and affordable housing. A comprehensive report on the demand profile for housing in Greater Christchurch was commissioned as part of the Capacity Assessment. The report revealed common trends likely for Christchurch City, Selwyn District and Waimakariri District over the next 30 years. Our Space (which Option 2 implements) seeks to provide a balanced approach that provides for current market demands and reflects the anticipated changes in these demands over the next thirty years. In doing so, it identifies a range of greenfield and redevelopment opportunities to support new housing.</p> <ul style="list-style-type: none"> <li>• The location of the proposed FDAs on the fringes of the existing townships at Rolleston, Rangiora and Kaiapoi promotes accessibility to existing communities and amenities – shops, community facilities, services, public transport etc. It also reinforces the function of existing townships.</li> <li>• The FDAs have been identified as future growth areas for many years. Option 2 therefore aligns with community and stakeholder expectations, especially for those that have been involved in those processes. There is a social benefit to following through with and implementing the recommendations of the Our Space process.</li> <li>• By identifying the full extent of the future growth areas, and explicitly setting out the circumstances in which areas</li> </ul>

<p><b>Benefits and Costs</b></p>	<p><i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i></p>	<p><i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i></p>
	<p>Christchurch councils are unable to provide for the housing needs of their communities. If insufficient opportunities for housing development are provided, housing supply may be unable to keep pace with increases in population. This is likely to affect the ability for people to find suitable and affordable housing close to services, amenities and employment.</p>	<p>within the FDAs can be rezoned through district planning processes, Option 2 provides greater certainty to landowners, residents adjoining or neighbouring the FDAs and other stakeholders.</p> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• Changes in amenity for neighbouring land owners or occupiers due to urbanisation could be perceived as negative. Those who value and wish to preserve a rural outlook and lifestyle on the fringes of these townships will be potentially adversely affected. These types of effects were identified in a response to the Schedule 1 consultation, in relation to development that has already taken place in Rolleston. However, as these areas have been identified for future growth for many years, it is likely the eventual urbanisation of these areas will have been anticipated.</li> </ul> <p><b>Overall social impact</b></p> <p>It is considered that Option 2 is likely to have greater positive social impacts than Option 1. The Proposed Change will assist the District Councils to provide sufficient opportunities for housing development, which should result in social benefits associated with greater housing affordability and choice. The location of the proposed FDAs, on the fringes of the existing townships, promotes accessibility to existing communities and amenities, which will also have positive social impacts.</p>

<p><b>Benefits and Costs</b></p>	<p><b>Option 1 - Status Quo (Do not progress a change to the CRPS)</b></p>	<p><b>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</b></p>
<p><b>Cultural benefits and costs</b>  Note: Some of the ways in which tangata whenua may be affected by the Proposed Change are captured under the environmental, economic and social effects sections of this report.</p>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>No direct cultural benefits have been identified as being likely to arise from not amending the CRPS.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>No direct cultural costs have been identified as being likely to arise from not amending the CRPS, other than the wider health and wellbeing impacts if insufficient housing is provided for.</li> <li>There is a potential risk of increased pressure on Councils to accept rezoning applications to provide for urban development in alternative locations, if there is a perceived undersupply of residential development capacity. Development in alternative locations could impact on cultural values. However, there are existing safeguards provided by the existing CRPS and District Plan frameworks to manage this risk.</li> </ul> <p><b>Overall cultural impact</b></p> <p>No direct cultural impacts have been identified as being likely to arise from not amending the CRPS.</p>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>No direct cultural benefits have been identified as likely to arise from Option 2, other than the wider health and wellbeing impacts of enabling the District Councils to provide for the housing needs of their communities. Better housing could support improved social and economic outcomes for Māori. Research and official statistics have shown that more Māori than other New Zealanders are affected by overcrowding or live in substandard housing. They also show lower levels of home ownership<sup>43</sup>.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>No direct negative effects on cultural values have been identified as likely to result from Option 2.</li> <li>The Greater Christchurch area is an outstanding cultural landscape for Ngāi Tahu whānui. It is the hapū of Te Ngāi Tūāhuriri, Ngāti Wheke (Rāpaki) and Taumutu Rūnanga. Kā Huru Manu (The Ngāi Tahu Cultural Mapping Project) identifies Tuahiwi, the kāinga of the local Ngāi Tahu hapū of Ngāi Tūāhuriri, situated between the Waimakariri River and Rakahuri (Ashley River) to the north-west of the Kaiapoi FDA. The 2,630-acre Kaiapoi Maori Reserve 873 situated at Tuahiwi was set aside as part of the Canterbury</li> </ul>

<sup>43</sup> He Whare Āhuru He Oranga Tāngata – The Māori Housing Strategy, Ministry of Business, Innovation and Employment, 2014

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		<p>Purchase 1848. The Proposed Change is not expected to negatively impact on these significant areas. There are no specific wāhi tapu (sacred places) or wāhi taonga (treasured possessions) sites identified on planning maps within the proposed FDAs<sup>44</sup>. However, there are Ngai Tahu silent file areas identified on Canterbury Maps, in close proximity to the Rangiora FDA and which overlap the Kaiapoi FDA. Silent files are areas identified by Papatipu Rūnanga as requiring special protection due to the presence of significant wāhi tapu or wāhi taonga in the area. Presence of a silent file indicates the presence of a significant wāhi tapu or wāhi taonga site.</p> <ul style="list-style-type: none"> <li>• Subdivision and land use change can increase the potential for effects on sites and areas of cultural significance. Such effects include land disturbance and the introduction of activities which are inappropriate in close proximity to, or causing the displacement or loss of, wāhi tapu or wāhi taonga values. Intensification of the built environment may increase demand for water supply, wastewater and stormwater disposal, adversely affecting surface and groundwater resources.</li> </ul> <p><b>Overall cultural impact</b></p>

<sup>44</sup> Selwyn District Council Cultural Landscapes Map: <https://selwyndc.maps.arcgis.com/apps/webappviewer/index.html?id=df1baafa75604c37bd7fdf058f00a040>;  
Waimakariri District Council District Plan Maps: <https://waimakariri.isoplan.co.nz/eplan/#/Property/0>

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<b>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</b>
		<p>No direct cultural impacts have been identified as likely to arise from the Proposed Change, other than the wider health and wellbeing impacts of enabling the District Councils to provide for the housing needs of their communities.</p> <p>Development can impact on issues of significance to Ngai Tahu, affecting their relationship with ancestral lands, water, sites, wāhi tapu and other taonga. There are no wāhi tapu, wāhi taonga or other culturally significant features or values identified on planning maps within the proposed FDAs. Due care will need to be taken during subsequent district planning processes, to ensure cultural values are appropriately protected and provided for (including in relation to the impact of urban development on indigenous biodiversity, culturally significant landforms, features and landscapes, sites of significance, any provision for papakāinga zoning and housing, and discharges to land and water). Where activities occur in silent file areas, consultation with Papatipu Rūnanga will be particularly important in order to identify effects of the activity and avoid, remedy or mitigate those effects.</p> <p>Through pre-notification with consultation with Te Rūnanga o Ngāi Tahu, Mahaanui Kurataiao and Ngai Tūāhuriri Runanga, a number of concerns were raised regarding the extent to which Our Space and the existing planning framework provide opportunities for kāinga nohoanga and enable mana whenua to achieve kaitiakitanga on Maori owned land. While addressing these important matters is outside the scope of</p>

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		this Proposed Change to Chapter 6, they will be key considerations through the forthcoming full review of the CRPS.
<b>Economic benefits and costs</b>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>No specific economic and employment benefits have been identified as likely to arise from not amending the CRPS.</li> <li>Under this option, the administrative costs to Environment Canterbury associated with amending Chapter 6 would likely be absorbed into the full review of the CRPS. The additional costs, over and above those that would be associated with a review that did not include Chapter 6, have been estimated at \$200,000.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>There are likely economic costs associated with not providing sufficient opportunities for housing development in Selwyn and Waimakariri Districts. Housing supply constraints, while not the only determinant, can contribute to house price increases, as seen in other parts</li> </ul>	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Option 2 would enable the district councils to provide additional opportunities for housing development, which is likely to have a positive economic impact.</li> <li>Whilst not the only determinant, land supply constraints can affect housing supply, which has a resultant impact on housing affordability and choice. The Regulatory Impact Statement prepared for the proposed NPS-UDC stated, “enabling sufficient development capacity would result in more competitive and responsive land and development markets that would enable growth in demand for housing (and business floorspace) to be met at a lower cost” and that, based on modelling, it was “estimated that the consumer benefits of enabling more flexible / responsive urban developments are in the order of \$100,000 to \$129,000 per added household”<sup>46</sup>.</li> <li>The eventual rezoning of land within the FDAs for urban development will likely provide economic benefit to</li> </ul>

<sup>46</sup> Ministry for the Environment, Regulatory Impact Statement for the Proposed National Policy Statement on Urban Development Capacity under the Resource Management Act 1991, pp. 15-17.

Benefits and Costs	<b>Option 1 - Status Quo (Do not progress a change to the CRPS)</b>	<b>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</b>
	<p>of New Zealand such as Auckland and Queenstown, and have wider economic impacts<sup>45</sup>.</p> <ul style="list-style-type: none"> <li>• Insufficient housing in Greater Christchurch could have consequential impacts on the potential growth of the wider local economy. Real or perceived difficulties for new households in accessing housing may deter migration and discourage investment by companies concerned how their employees will find appropriate accommodation.</li> </ul> <p><b>Overall economic impact</b></p> <p>The greatest economic impacts likely to arise from not progressing a change to Chapter 6 of the CRPS relate to increased land prices and housing costs which may be attributed to insufficient land supply for housing, and a consequential risk to the growth of the wider economy due to insufficient housing options for a growing workforce.</p>	<p>landowners within the FDAs, developers and the building sector.</p> <ul style="list-style-type: none"> <li>• Though difficult to quantify for the purposes of section 32(2)(b) of the RMA, economic growth and employment will likely result, particularly in the residential construction sector, from subsequent development and construction opportunities. Construction is the third largest employment sector in the Greater Christchurch urban area, with 25,153 employees in 2018<sup>47</sup>.</li> <li>• Similarly difficult to quantify, there will be flow on benefits to the wider community, with additional population through anticipated migration providing an additional workforce and customer base for townships, and an increase in the local authority rating base.</li> <li>• New urban growth areas will be integrated into the Council’s existing reticulated infrastructure networks. Growing existing urban areas makes more efficient use of existing assets – resulting in less physical and social infrastructure costs per household. Option 2 provides for</li> </ul>

<sup>45</sup> Nunns, P, The causes and economic consequences of rising regional housing prices in New Zealand, December 2019.

<sup>47</sup> Greater Christchurch Partnership, Economic Indicators, Data Source: Statistics New Zealand Annual Business Frame Survey (to February 2018)

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		<p>the efficient utilisation of existing and planned infrastructure investment<sup>48</sup>.</p> <ul style="list-style-type: none"> <li>• Option 2 minimises land use patterns that could curtail productive rural activities. It also allows commercial decisions related to primary production to be made with a higher degree of certainty.</li> <li>• Subject to timing, under Option 2 the administrative costs to Selwyn and Waimakariri District Councils associated with preparing and notifying changes to the District Plans to give effect to the amended CRPS are more likely to be able to be absorbed into district planning processes, including the current District Plan Reviews.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• There will be administrative costs to Environment Canterbury associated with preparing and notifying a change to the CRPS ahead of the scheduled full review.</li> <li>• A change in land use from rural to residential activities will result in the loss of some primary production potential. However, this has been anticipated for many years.</li> </ul> <p><b>Overall economic impact</b></p>

<sup>48</sup> Waimakariri District Council Infrastructure Strategy 2048: 2018-2048; Selwyn District Council Long-Term Plan 2018-2048, Vol 2, 30-Year Infrastructure Strategy 2018-2048.

Benefits and Costs	<i>Option 1 - Status Quo (Do not progress a change to the CRPS)</i>	<i>Option 2 - Modify Map A to identify future development areas through a change ahead of the scheduled full review of the CRPS and insert new policy provisions to enable land within these areas to be rezoned by the Selwyn and Waimakariri District Councils if required to meet their medium-term housing needs</i>
		It is considered that Option 2 is likely to have greater positive economic benefits than Option 1. Enabling urban development provides for economic growth and employment, both during the construction phase and ongoing. There are likely to be direct economic benefits for landowners within the proposed FDAs, developers and the building sector and flow on benefits through an additional workforce and customer base for townships and an increase in the local authority rating base. The Proposed Change will assist the District Councils to ensure they can provide sufficient opportunities for housing development, which should result in greater housing affordability and choice. The location of the proposed FDAs also promotes the efficient utilisation of existing and planned infrastructure investment.

### **7.2.3 Efficiency**

The above evaluation shows that Option 2 is likely to be highly efficient in giving effect to the NPS-UD and ensuring sufficient housing development capacity is provided for in Greater Christchurch, and to enable the District Councils to rezone land within the Projected Infrastructure Boundary if a sufficiency shortfall is identified. Option 2 delivers significant environmental, social and economic benefits and relatively few costs. Option 1 is of medium-low efficiency because it will not enable the Greater Christchurch local authorities to respond to the identified housing development capacity shortfall or give effect to the NPS-UD in a timely way, and is unlikely to result in the delivery of significant urban development in the short to medium term. The result would likely be a delay to the provision of increased supply to meet NPS-UD and sub-regional development objectives and the associated social and economic benefits. It also presents a risk that development may occur on a piecemeal basis with variable or poor long-term outcomes.

Overall, the Proposed Change supports the future growth needs of Greater Christchurch, while contributing to an urban form that achieves consolidation and intensification of existing urban areas and avoids unplanned expansion into the surrounding rural areas. Where potential negative effects or costs are identified, these have been mitigated through the wording of the provisions, for example by requiring new development to provide opportunities for higher density living environments, and ensuring development is aligned with the efficient provision and use of network infrastructure.

## 7.2.4 Effectiveness

This section examines the effectiveness of the proposed amendments in achieving the purpose of the Proposed Change and the CRPS objectives.

The evaluation of the effectiveness of the proposed provisions has been structured around three key questions:

1. a) Will the provisions give effect to the NPS-UD and ensure sufficient land in Greater Christchurch is rezoned for the medium term (10 years) and identified for the long term (30 years) to meet the needs of existing and future communities, by identifying and enabling additional development capacity for housing in greenfield growth areas within the Projected Infrastructure Boundary shown on Map A in Chapter 6 of the CRPS, in Rolleston, Rangiora and Kaiapoi?  
  
b) Will the provisions provide flexibility for Selwyn and Waimakariri District Councils to consider rezoning land within the Projected Infrastructure Boundary to meet medium term housing demands as part of their district planning processes, where a sufficiency shortfall is identified through a housing development capacity assessment?  
  
(i.e. will they achieve the purpose of the Proposed Change?)
2. Will the provisions achieve the CRPS objectives?

The proposed provisions would be effective in achieving the purpose of the Proposed Change. The Proposed Change would amend Map A to identify new greenfield growth areas in Rolleston, Rangiora and Kaiapoi within the PIB. Amendments to existing policies would expressly provide for urban development within the FDAs, while the new Policy 6.3.12 would set out the circumstances in which such development can be enabled. The proposed provisions would enable Selwyn and Waimakariri District Councils to consider identifying and/or rezoning land within the FDS through their district planning processes, if required to meet their medium term housing needs.

The proposed provisions will be effective in implementing key policies of the NPS-UD, including by ensuring sufficient development capacity to support housing and business growth in Greater Christchurch is enabled over the short, medium and long term, in accordance with Policy 2. The assessment of development capacity carried out in 2018 indicated that while the overall amount of feasible development capacity for housing in Greater Christchurch is sufficient to meet demand over the medium term, there is insufficient capacity in certain locations within Greater Christchurch in the medium term and overall in relation to long term housing demand. The Proposed Change responds to this projected shortfall, by identifying additional greenfield areas for housing in Rolleston, Rangiora and Kaiapoi.

Option 1, the status quo option, would be less effective in achieving the purpose of the Proposed Change. The existing policy framework of Chapter 6 and Map A prevent the district councils from rezoning land within greenfield growth areas within the PIB that have been identified in Our Space to accommodate additional capacity. In this regard, the CRPS is currently constraining the ability for the district councils to consider rezoning land to meet their medium term housing needs as part of their district planning processes and ensure sufficient capacity is enabled and national direction in the NPS-UD is given effect to.

The CRPS Objectives that are most relevant to the Proposed Change are Objectives 6.2.1-6.2.6 set out in Chapter 6:

*Objective 6.2.1 Recovery framework*

*Objective 6.2.1a Targets for sufficient, feasible development capacity for housing*

*Objective 6.2.2 Urban form and settlement pattern*

*Objective 6.2.3 Sustainability*

*Objective 6.2.4 Integration of transport infrastructure and land use*

*Objective 6.2.5 Key activity and other centres*

*Objective 6.2.6 Business land development*

The table below sets out the assessment of the extent to which the status quo provisions (Option 1) and the proposed provisions (Option 2) are the most appropriate way to achieve the objectives.

**Table 10 – Evaluation against CRPS Objectives**

Canterbury Regional Policy Statement 2013	Assessment
<b>CHAPTER 6 – RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH</b>	
<p><b>Objective 6.2.1 Recovery framework</b></p> <p>Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</p> <ol style="list-style-type: none"> <li>1. identifies priority areas for urban development within Greater Christchurch;</li> <li>2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;</li> <li>3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;</li> <li>4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;</li> <li>5. protects and enhances indigenous biodiversity and public space;</li> <li>6. maintains or improves the quantity and quality of water in groundwater aquifers and surface water bodies, and quality of ambient air;</li> <li>7. maintains the character and amenity of rural areas and settlements;</li> <li>8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;</li> <li>9. integrates strategic and other infrastructure and services with land use development;</li> <li>10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;</li> </ol>	<p>Chapter 6 was inserted into the Canterbury Regional Policy Statement (CRPS) following the adoption of the Land Use Recovery Plan (LURP). The greenfield priority areas for development identified on Map A were to provide for the post-earthquake recovery period through to 2028. It has been demonstrated, through the 2018 Housing Capacity Assessment, that Map A does not provide for sufficient development capacity to meet housing needs in Greater Christchurch over the medium to long term.</p> <p>The Greater Christchurch Partnership has previously considered the longer-term growth needs of Greater Christchurch through to 2041, with the extent of planned greenfield areas around Christchurch City and the main towns in Selwyn and Waimakariri to support future housing growth delineated by the Projected Infrastructure Boundary (PIB) on Map A.</p> <p>The Proposed Change would identify the additional areas within the PIB not already identified as greenfield priority areas, as Future Development Areas (FDAs), and allow Chapter 6 and Map A the flexibility to respond to identified medium term housing capacity needs by expressly providing for urban development within the proposed FDAs in accordance with clause 3 of Objective 6.2.1. It would support the land use and infrastructure framework provided for by this Objective.</p> <p>The proposed provisions would contribute to the achievement of this objective by ensuring future growth is directed to appropriate locations that are consistent with the long term growth strategies for Greater Christchurch.</p> <p>The southern end of the proposed FDA in Kaiapoi is within the 50dBA airport noise contour for Christchurch International Airport shown on Map A. To manage potential reverse sensitivity effects on airport operations the</p>

Canterbury Regional Policy Statement 2013	Assessment
<p>11. optimises use of existing infrastructure; and</p> <p>12. provides for development opportunities on Māori Reserves in Greater Christchurch.</p>	<p>CRPS, Policy 6.3.5 states that noise sensitive activities (including residential development) within the 50dBA airport noise contour should be avoided, with an exception for greenfield priority areas in Kaiapoi. It is noted that Christchurch International Airport is undertaking remodelling of the airport noise contours. This will inform the evidence base for the CRPS review and future rezoning of land within the Kaiapoi FDA over the longer term.</p> <p>Parts of Kaiapoi, including the proposed FDA, are identified as ‘high hazard areas’<sup>49</sup> in modelling undertaken by Environment Canterbury. Waimakariri District Council is undertaking additional modelling to inform the development of appropriate natural hazards provisions as part of its District Plan Review. The proposed provisions in the new Policy 6.3.12 require avoidance or appropriate mitigation of the effects of natural hazards in accordance with Chapter 11. If land within any of the proposed FDAs is determined to be ‘high hazard’ following the outcome of updated modelling by the district councils (or any future modelling), the existing CRPS policy framework directs that new subdivision, use and development of the land (other than critical infrastructure) should be avoided, unless the</p>

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<sup>49</sup> The CRPS defines ‘high hazard areas’ as: High hazard areas are:

1. flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1 or where depths are greater than 1 metre, in a 0.2% annual exceedance probability flood event;
2. land outside of greater Christchurch subject to coastal erosion over the next 100 years; and
3. land within greater Christchurch likely to be subject to coastal erosion including the cumulative effects of sea level rise over the next 100 years. This includes (but is not limited to) the land located within Hazard Zones 1 and 2 shown on Maps in Appendix 5 of this Regional Policy Statement that have been determined in accordance with Appendix 6; and
4. land subject to sea water inundation (excluding tsunami) over the next 100 years. This includes (but is not limited to) the land located within the sea water inundation zone boundary shown on Maps in Appendix 5 of this Regional Policy Statement.

When determining high hazard areas, projections on the effects of climate change will be taken into account.

Canterbury Regional Policy Statement 2013	Assessment																								
	existing criteria set out in Policy 11.3.1 in Chapter 11 of the CRPS are met. There may be varying degrees of flooding / ponding in Rolleston, and the District Council is working on appropriate provisions for these areas <sup>50</sup> .																								
<p><b>Objective 6.2.1a Targets for sufficient, feasible development capacity for housing</b></p> <p>For the period 2018-2048, sufficient, feasible development capacity for housing is enabled in Greater Christchurch in accordance with Table 6.1.</p> <p>Table 6.1 Targets for housing development capacity in Greater Christchurch, 2018-2048</p> <table border="1" data-bbox="203 655 1111 1153"> <thead> <tr> <th data-bbox="203 655 427 746"></th> <th colspan="3" data-bbox="427 655 1111 746">Development capacity to be enabled (number of dwellings)</th> </tr> <tr> <th data-bbox="203 746 427 874"></th> <th data-bbox="427 746 656 874">Medium term (2018-2028)</th> <th data-bbox="656 746 884 874">Long term (2028-2048)</th> <th data-bbox="884 746 1111 874">Total 30 year period (2018-2048)</th> </tr> </thead> <tbody> <tr> <td data-bbox="203 874 427 962">Christchurch City</td> <td data-bbox="427 874 656 962">17,400</td> <td data-bbox="656 874 884 962">38,550</td> <td data-bbox="884 874 1111 962">55,950</td> </tr> <tr> <td data-bbox="203 962 427 1015">Selwyn</td> <td data-bbox="427 962 656 1015">8,600</td> <td data-bbox="656 962 884 1015">8,690</td> <td data-bbox="884 962 1111 1015">17,290</td> </tr> <tr> <td data-bbox="203 1015 427 1067">Waimakariri</td> <td data-bbox="427 1015 656 1067">6,300</td> <td data-bbox="656 1015 884 1067">7,060</td> <td data-bbox="884 1015 1111 1067">13,360</td> </tr> <tr> <td data-bbox="203 1067 427 1153">Greater Christchurch</td> <td data-bbox="427 1067 656 1153">32,300</td> <td data-bbox="656 1067 884 1153">54,300</td> <td data-bbox="884 1067 1111 1153">86,600</td> </tr> </tbody> </table>		Development capacity to be enabled (number of dwellings)				Medium term (2018-2028)	Long term (2028-2048)	Total 30 year period (2018-2048)	Christchurch City	17,400	38,550	55,950	Selwyn	8,600	8,690	17,290	Waimakariri	6,300	7,060	13,360	Greater Christchurch	32,300	54,300	86,600	<p>The Proposed Change implements this Objective by identifying and enabling sufficient, feasible development capacity for housing in Greater Christchurch, in accordance with Table 6.1.</p> <p>To meet the projected demand for housing in Greater Christchurch over the next 30 years, a minimum target of 86,600 dwellings has been set. Collectively, the District Plans for Christchurch City, Selwyn District and Waimakariri District provide enabled feasible capacity for around 73,875 additional dwellings. The Proposed Change will enable the additional development capacity required to be provided for, in accordance with the strategy for accommodating future growth set out in Our Space.</p>
	Development capacity to be enabled (number of dwellings)																								
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Christchurch City	17,400	38,550	55,950																						
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Greater Christchurch	32,300	54,300	86,600																						
<p><b>Objective 6.2.2 Urban form and settlement pattern</b></p> <p>The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a</p>	<p>The draft new Policy 6.3.12 and proposed changes to Map A would implement this Objective by providing for future household growth in a</p>																								

<sup>50</sup> <https://yoursay.selwyn.govt.nz/dprflooding>

Canterbury Regional Policy Statement 2013	Assessment
<p>foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:</p> <ol style="list-style-type: none"> <li>1. aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery: <ol style="list-style-type: none"> <li>(a) 35% averaged over the period between 2013 and 2016</li> <li>(b) 45% averaged over the period between 2016 to 2021</li> <li>(c) 55% averaged over the period between 2022 and 2028;</li> </ol> </li> <li>2. providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas and brownfield sites;</li> <li>3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;</li> <li>4. providing for the development of greenfield priority areas on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;</li> <li>5. encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;</li> <li>6. Managing rural residential development outside of existing urban and priority areas; and</li> <li>7. Providing for development opportunities on Māori Reserves.</li> </ol>	<p>manner that supports consolidation and intensification of urban areas and avoiding unplanned expansion.</p> <p>The Strategy set out in Our Space seeks to encourage a balance between new housing enabled through redevelopment opportunities within existing urban areas (i.e. intensification) and development capacity in greenfield locations. The approximate breakdown between these different locations for the period 2018 to 2048 is shown in Figure 12 of Our Space as follows:</p> <ul style="list-style-type: none"> <li>• Redevelopment of existing urban areas in Christchurch City (45%)</li> <li>• Existing greenfield areas in Christchurch City, Selwyn and Waimakariri (36%)</li> <li>• New greenfield and redevelopment areas in Selwyn and Waimakariri (19%)</li> </ul> <p>The settlement pattern endorsed through Our Space provides for new subdivisions in greenfield locations across all three council areas to account for around 55% of the identified housing capacity. Intensification is expected to provide for the remaining 45%, primarily in Christchurch City, but not exclusively. The Greater Christchurch councils are working towards the achievement of the targets for intensification to 2028 through district plan provisions and other initiatives. The Christchurch District Plan provides substantial opportunities to redevelop and intensify existing urban areas to meet both housing and business needs, and the Council is developing programmes to support investment and housing redevelopment, with the initial focus on the Central City. Through the reviews of their respective District Plans, Selwyn and Waimakariri District Councils are also considering additional provisions to encourage and enable redevelopment within existing urban areas and close to town centres.</p> <p>The Proposed Change does not deal directly with density, as this would be premature ahead of the finalisation of evaluation work being undertaken by the local authorities in 2020/21 to inform the District Plan Review processes and full review of the CRPS. However, Our Space gives direction that a</p>

Canterbury Regional Policy Statement 2013	Assessment
	<p>minimum density of 12hh/ha should be achieved in the FDAs. An amendment to Objective 6.2.2 is proposed, to make clear that clause 2 applies to the FDAs. In response to the statement of expectations issued by the Minister for the Environment in his Direction to use the Streamlined Planning Process for the Proposed Change, clause 2(a) of the new Policy 6.3.12 includes direction for the FDAs to provide higher density living environments and a range of housing types. Higher densities help to create a compact urban form that supports existing activity centres and can be served efficiently by infrastructure, including public transport.</p> <p>The Proposed Change is consistent with clause 4 of this Objective, in that it provides for the development of greenfield areas on the periphery of Rangiora, Kaiapoi and Rolleston at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure. An amendment is proposed to this clause, to incorporate a reference to the FDAs alongside the reference to greenfield priority areas. The identification of the FDAs is a further way in which the urban form and settlement pattern in Greater Christchurch will be managed to provide sufficient land in line with the overall intent of this objective.</p> <p>The identification of FDAs in Rangiora, Kaiapoi and Rolleston also aligns with clause 5 of this Objective – to encourage sustainable and self-sufficient growth of these towns.</p>
<p><b>Objective 6.2.3 Sustainability</b></p> <p>Recovery and rebuilding is undertaken in Greater Christchurch that:</p> <ol style="list-style-type: none"> <li>1. provides for quality living environments incorporating good urban design;</li> <li>2. retains identified areas of special amenity and historic heritage value;</li> <li>3. retains values of importance to Tangata Whenua;</li> <li>4. provides a range of densities and uses; and</li> </ol>	<p>The Proposed Change supports this Objective.</p>

Canterbury Regional Policy Statement 2013	Assessment
<p>5. is healthy, environmentally sustainable, functionally efficient, and prosperous.</p>	
<p><b>Objective 6.2.4 Integration of transport infrastructure and land use</b>            Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:</p> <ol style="list-style-type: none"> <li>1. managing network congestion;</li> <li>2. reducing dependency on private motor vehicles;</li> <li>3. reducing emission of contaminants to air and energy use;</li> <li>4. promoting the use of active and public transport modes;</li> <li>5. optimising use of existing capacity within the network; and</li> <li>6. enhancing transport safety.</li> </ol>	<p>The Proposed Change would assist in the achievement of this Objective. A priority for the Settlement Pattern Update was to ensure that future development is appropriately aligned with and informs long term transport planning and investment in Greater Christchurch, primarily considered as part of other processes, to ensure that more people can reside in areas accessible to a mix of transport modes. Of particular importance is alignment with the directions in the Canterbury Regional Public Transport Plan, which sets out a vision for Greater Christchurch’s public transport system. The strategy in Our Space (implemented in part by the Proposed Change) encourages higher density residential developments that support a more compact urban form, with development to be focused around activity centres and along transport corridors, greenfield locations around towns with planned public transport upgrades, and a higher apportionment of growth to Christchurch City over the longer term to manage the effects of growth and reduce transport network pressures. Option 2 directs future housing growth to existing townships with planned public transport upgrades and which provide opportunities for modal choice. It also encourages higher density living environments, including appropriate mixed use development, which should support the viability and increased update of active and public transport.</p> <p>Further and detailed consideration will be given to the integration of land use and transport through structure planning and outline development plan processes, including downstream transport impacts attributed to commuter flows, as land within the FDAs comes forward for development.</p>
<p><b>6.2.5 Key activity and other centres</b></p>	<p>The Proposed Change supports this Objective. Rolleston, Kaiapoi and Rangiora town centres are identified as Key Activity Centres. The Proposed Change does not provide for commercial uses (aside from small</p>

Canterbury Regional Policy Statement 2013	Assessment
<p>Support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period:</p> <ol style="list-style-type: none"> <li>1. The Central City</li> <li>2. Key Activity Centres</li> <li>3. Neighbourhood centres</li> </ol> <p>These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles.</p> <p>The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres.</p>	<p>neighbourhood centres that support local needs) but is likely to increase the number of people using these centres.</p>
<p><b>6.2.6 Business land development</b></p> <p>Identify and provide for Greater Christchurch’s land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2, recognising that:</p> <ol style="list-style-type: none"> <li>1. The greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities;</li> <li>2. Except where identified for brownfield redevelopment, areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities;</li> <li>3. New commercial activities are primarily directed to the Central City, Key Activity Centres, and neighbourhood centres;</li> <li>4. A range of other business activities are provided for in appropriate locations; and</li> </ol>	<p>The Proposed Change does not conflict with this Objective. Despite significant business growth being projected in Greater Christchurch over the next 30 years, the Housing and Business Development Capacity Assessment demonstrated that overall there is sufficient capacity for business development in Greater Christchurch at least over the medium term<sup>51</sup>.</p>

<sup>51</sup> Our Space 2018-2048: Greater Christchurch Settlement Pattern Update, Greater Christchurch Partnership, Table 4, page 17.

<b>Canterbury Regional Policy Statement 2013</b>	<b>Assessment</b>
5. Business development adopts appropriate urban design qualities in order to retain business, attract investment and provide for healthy working environments.	

The assessment demonstrates that the proposed provisions align with and would be effective in achieving the existing objectives of the CRPS. In summary, the proposed provisions:

- align with the recovery framework for Greater Christchurch set out in Objective 6.2.1, including by directing future urban development to appropriate locations that are consistent with the long term growth strategies for Greater Christchurch;
- support the land use and infrastructure framework provided for by the CRPS;
- ensure sufficient development capacity for housing is provided for in Greater Christchurch, in accordance with the housing targets set out in Objective 6.2.1a;
- support the urban form and settlement pattern promoted by the CRPS and provide for growth in a manner that supports consolidation and intensification of existing urban areas and avoids unplanned expansion (Objective 6.2.2);
- promote the integration of transport and infrastructure planning, including by directing growth to locations that support likely future public transport opportunities and investment and requiring land use decisions to consider transport impacts in accordance with existing policies (Objective 6.2.4).

Option 2 represents a plan, monitor and manage approach intended to ensure spatial planning decisions are responsive to changing population and household projections as well as changes in market conditions and other relevant factors. It would enable housing growth to be provided for in a coordinated way and the staging and timing of future development managed to ensure transport and other infrastructure planning is integrated with the provision of additional housing.

Option 1, the status quo option, would be less effective at achieving the CRPS objectives in that it would constrain the ability for Selwyn and Waimakariri District Councils to provide sufficient development capacity and land for future growth in accordance with Objectives 6.2.1a and 6.2.2.

### **7.2.5 Overall evaluation of appropriateness**

Examining the options for enabling additional urban development capacity to ensure sufficient land for housing is provided for in Greater Christchurch has resulted in the development of Proposed Change 1 to Chapter 6 of the CRPS. The purpose of the Proposed Change is appropriate with respect to promoting the sustainable management of natural and physical resources. The cost-benefit and efficiency and effectiveness assessments have shown that the proposed provisions are more efficient than the status quo and would be more effective at achieving the purpose of the Proposed Change and the objectives of the CRPS.

Directing future housing growth to development capacity already signalled by the PIB on Map A represents the most efficient and effective option for accommodating the projected housing development capacity shortfalls. For some time now the councils have factored these areas into respective infrastructure strategies associated with Long Term Plans. These plans have already benefited from extensive community input, as did the earlier UDS engagement and subsequent resource management and recovery consultation processes that led to Chapter 6 of the CRPS. Further and more detailed assessments of these future growth areas undertaken as part of district plan reviews will need to consider and address emerging national policy including in relation to impacts on highly productive land.

### 7.3 Risk of acting or not acting

Section 32(2)(c) of the RMA requires Environment Canterbury to take into account the risk of acting or not acting if there is uncertain or insufficient information.

The proposed provisions have been developed based on the evidence base and extensive work undertaken in developing Our Space. It is considered there is little uncertainty about the provisions and the risks of acting are considered to be low.

There are uncertainties in accurately determining the projected demand for housing based on population and household projections, particularly over a thirty year period and given Christchurch's unique post-earthquake circumstances. The Covid-19 pandemic could have potentially significant impacts on the economy, migration, and the housing market. Acknowledgement of this uncertainty is reflected in the NPS-UD requirements for ongoing monitoring and review of projections and targets as part of the periodic capacity assessments. Subsequent capacity assessments will benefit from new data and information, for example, the results of the 2018 Census and the anticipated release of new sub-regional and territorial authority household projections by Statistics NZ.

It is considered that these uncertainties are appropriately dealt with through the drafting of the proposed provisions. The draft new Policy 6.3.12 would enable the district councils to rezone land within the proposed FDAs where a shortfall against medium term housing targets is demonstrated.

Periodic assessments of the sufficiency of development capacity, required by the NPS-UD will be used as the basis for any future need to rezone land within the FDAs. This will ensure spatial planning decisions are responsive to changing population and household projections as well as changes in market conditions and other relevant factors. The housing and business capacity assessments will provide a clear evidence base for understanding the amount of feasible development capacity that has been enabled and what additional capacity is required.

It is essential that development takes place in a coordinated way and the staging and timing of future development is managed to ensure transport and other infrastructure planning is integrated with the provision of additional housing. More detailed planning to determine the specific staging of development within the FDAs will be required before land is rezoned through district planning processes. Outline development planning is one of the main methods set out in the CRPS to ensure the required detailed planning is undertaken within identified growth areas.

The risk of not acting is potentially significant.

Under the NPS-UD Greater Christchurch is regarded a Tier 1 (high growth) area. The NPS-UD requires local authorities to provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium, and long term, as well as providing for an additional competitiveness margin. At present the land supply within the Waimakariri and Selwyn Districts falls short of that requirement in the medium and long term. The NPS-UD requires that, if a local authority determines that there is insufficient development capacity over the short term, medium term or long term, which is wholly or partly a result of RMA planning documents, it must

change those documents to increase development capacity for housing or business land as soon as practicable. The NPS-UD requires local authorities to give immediate effect to these policies.

The Proposed Change is necessary to ensure that Waimakariri and Selwyn District Councils can rezone areas within the FDAs, as required, to meet shortfalls in the available development capacity for housing as part of their District Plan Reviews. At present, the existing policy framework of the CRPS is an impediment to the councils rezoning any land outside of that already identified for development in the CRPS. The Proposed Change will enable any future zoning of land to occur in a timely way through Selwyn and Waimakariri District Council's District Plan Reviews and/or subsequent processes, and for those councils to give effect to the requirements of the NPS-UD.

## **8. Conclusions**

In preparing this evaluation the following matters have been considered:

- The extent to which the purpose of the Proposed Change is the most appropriate way to achieve the purpose of the Act.
- The efficiency and effectiveness of the provisions in achieving the purpose of the Proposed Change and the objectives of the CRPS, including the environmental, economic, social and cultural costs and benefits of the implementation of the provisions.
- Opportunities for economic growth and employment.
- Overall appropriateness of the options.
- The risk of acting or not acting if there is uncertain or insufficient information.

The purpose of the Proposed Change is the most appropriate way to achieve the purpose of the RMA.

The evaluation of reasonably practicable options demonstrates that the purpose of the Proposed Change and CRPS objectives are most likely to be achieved by Option 2. Overall, the proposed provisions are considered to represent the most appropriate response to the issues that underpin the Proposed Change.

In summary, the proposed provisions are the most appropriate option for the Proposed Change because their environmental, economic, social and cultural benefits out-weigh the costs and they are more effective and efficient than the status quo provisions.

## Appendix 1: Gazette notice– Direction of the Minister for the Environment to use the Streamlined Planning Process, April 2020

NEW ZEALAND GAZETTE

### The Resource Management (Direction to Canterbury Regional Council to Enter the Streamlined Planning Process for a Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement) Notice 2020

Pursuant to clauses 78 and 79(2) of Schedule 1 of the Resource Management Act 1991, the Minister for the Environment gives the following notice.

#### Notice

##### 1. Title and Commencement

(1) This notice is the Resource Management (Direction to Canterbury Regional Council to enter the Streamlined Planning Process for a proposed change to Chapter 6 of the Canterbury Regional Policy Statement) Notice 2020.

(2) This notice shall come into force 20 working days after publication.

##### 2. Direction to Enter Streamlined Planning Process

#### *Minister for the Environment's Direction on the Application From Canterbury Regional Council (Operating as Environment Canterbury) to use a Streamlined Planning Process for a Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement*

The Minister for the Environment received an application from Canterbury Regional Council on 30 September 2019, pursuant to section 80C and clause 75 of Schedule 1 of the Resource Management Act 1991 (RMA), to use a streamlined planning process to prepare a planning instrument, being a change to Chapter 6 of the Canterbury Regional Policy Statement.

In accordance with clause 78 of Schedule 1 of the RMA, the Minister for the Environment directs that Canterbury Regional Council uses the following streamlined planning process for the proposed change to Chapter 6 of the Canterbury Regional Policy Statement.

	Step	Timeframes
1	Undertake pre-notification consultation with Te Rūnanga o Ngāi Tahu (the iwi authority) and Ngāi Tūāhuriri (being a hapū of Ngāi Tahu) in accordance with clause 4A of Schedule 1 of the RMA.	To be completed no later than 15 working days after the date that this notice comes into force.
2	Publicly notify the proposed change to Chapter 6 of the Canterbury Regional Policy Statement for written submissions in accordance with clause 5 of Schedule 1 of the RMA. A period of 20 working days for submissions must be specified in the public notice.	To be publicly notified no later than 20 working days after completion of pre-notification consultation (Step 1).
3	Provide an opportunity for written submissions in accordance with clause 6 of Schedule 1 of the RMA.	Public submissions to be received no later than 20 working days after public notification (Step 2).
4	Provide for a written recommendations report to be submitted for the Minister for the Environment's consideration, showing how submissions have been considered and the changes (if any) recommended to the proposed planning instrument, including: <ul style="list-style-type: none"> <li>i. The evaluation report under sections 32 and 32AA; and</li> <li>ii. A report summarising how the persons making the recommendation have had regard to the evaluation report; and</li> </ul> The reports and documents required by clause 83(1) of Schedule 1 for the Minister's consideration.	To be submitted to the Minister no later than 30 working days after the close of submissions (Step 3).
The total time period within which the streamlined planning process for the proposed change to Chapter 6 of the Canterbury Regional Policy Statement must be completed. The process is considered to be complete when the documents referred to in Step 4 above are submitted to the Minister for the Environment.		Steps 1-4 to be completed no later than 85 working days after this notice comes into force.
In accordance with clause 78(5) of Schedule 1 of the RMA, the Minister directs that Canterbury Regional Council engages an appropriately skilled independent commissioner to undertake a technical peer review of the recommendations report referred to in Step 4. The independent commissioner is required to produce a formal technical peer review report for Canterbury Regional Council. Canterbury Regional Council is required to demonstrate how the independent commissioner's comments have been addressed or incorporated into their final recommendations report.		

#### Statement of Expectations

## NEW ZEALAND GAZETTE

The Minister for the Environment's expectations for Canterbury Regional Council, are that in undertaking the streamlined planning process as directed:

- a. include in the proposed change policy direction for the Future Development Areas to provide higher density living environments, including mixed use developments and a greater range of housing types, and enables the efficient provision and use of network infrastructure.
- b. place on a publicly accessible website, the dates and anticipated timeframes for the process steps (and updates as necessary).
- c. make available on a publicly accessible website, all submissions received no later than five working days after the submission period closes.

### **Reporting Requirements**

The Canterbury Regional Council shall provide a written report to the Minister for the Environment within 10 working days of the completion of each of steps 1 (pre-notification consultation) and 3 (submissions) above. These reports shall demonstrate compliance with the preceding steps and identify any issues which may affect the Council's ability to comply with the Minister's Direction.

Dated at Wellington this 23rd day of April 2020.

HON DAVID PARKER, Minister for the Environment.

### **Notes**

- i. This Direction must be complied with.
- ii. Section 80B(2)(a) and (b) specifies all mandatory Schedule 1 requirements in any Streamlined Planning Process (to the extent they are applicable to the particular planning instrument).
- iii. Clause 80 of Schedule 1 of the RMA provides the Minister with the ability to amend this Direction on his/her own initiative or following a request from the local authority.
- iv. The Local Authority may, in accordance with clause 81 of Schedule 1 of the RMA apply in writing to the Minister for an extension of timeframes.
- v. Clause 89 of Schedule 1 of the RMA provides the Minister with the ability to revoke a Direction made under clause 78 of Schedule 1 of the RMA.
- vi. Clause 88 of Schedule 1 of the RMA provides for the Council to withdraw the planning instrument at any time prior to the Minister making his/her decision on the proposed planning instrument under Clause 84 of Schedule 1 of the RMA.

## Appendix 2: Amended Gazette Notice, August 2020

NEW ZEALAND GAZETTE

### **Amending a Notice—The Resource Management (Direction to Canterbury Regional Council to Enter the Streamlined Planning Process for a Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement) Notice 2020**

Pursuant to clauses 79, 80 and 81 of Schedule 1 of the Resource Management Act 1991, the Minister for the Environment gives notice of approval of an extension to timeframes specified in the Direction published in the [New Zealand Gazette, 29 Apr 2020, Notice No. 2020-go1780](#).

The amendments are as follows:

1. Step 2 timeframes are amended to extend the timeframe from 20 working days to 140 working days. The amended Timeframes provision states *To be publicly notified no later than 140 working days after completion of the pre-notification consultation (Step 1)*.
2. The total time period within which the streamlined planning process for the proposed change to Chapter 6 of the Canterbury Regional Policy Statement must be completed, is amended to extend the timeframe from 85 working days to 205 working days. The amended Timeframes provision states *Steps 1-4 to be completed no later than 205 working days after this notice comes into force*.

These amendments take effect on the date of publication of this notice.

#### **Effect of This Notice:**

This notice amends the “Resource Management (Direction to Canterbury Regional Council to Enter the Streamlined Planning Process for a Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement) Notice 2020”, published in the [New Zealand Gazette, 29 Apr 2020, Notice No. 2020-go1780](#), only to the extent specified in this notice.

Dated at Wellington this 6th day of August 2020.

HON DAVID PARKER, Minister for the Environment.

2020-go3773

18-08-2020 16:08

### Appendix 3: Section 32 of the Resource Management Act 1991

Section 32 of the RMA sets out the requirements for preparing and publishing evaluation reports. Section 32 states:

#### 32 Requirements for preparing and publishing evaluation reports

- (1) An evaluation report required under this Act must—
  - (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
  - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
    - (i) identifying other reasonably practicable options for achieving the objectives; and
    - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
    - (iii) summarising the reasons for deciding on the provisions; and
  - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.
- (2) An assessment under subsection (1)(b)(ii) must—
  - (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
    - (i) economic growth that are anticipated to be provided or reduced; and
    - (ii) employment that are anticipated to be provided or reduced; and
  - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
  - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- (3) If the proposal (an **amending proposal**) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an **existing proposal**), the examination under subsection (1)(b) must relate to—
  - (a) the provisions and objectives of the amending proposal; and

- (b) the objectives of the existing proposal to the extent that those objectives—
  - (i) are relevant to the objectives of the amending proposal; and
  - (ii) would remain if the amending proposal were to take effect.
  
- (4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.
  
- (4A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—
  - (a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and
  - (b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.
  
- (5) The person who must have particular regard to the evaluation report must make the report available for public inspection—
  - (a) as soon as practicable after the proposal is made (in the case of a standard or regulation); or
  - (b) at the same time as the proposal is notified.
  
- (6) In this section,—
  - objectives** means,—
    - (a) for a proposal that contains or states objectives, those objectives;
    - (b) for all other proposals, the purpose of the proposal
  - proposal** means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act
  - provisions** means,—
    - (a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change;
    - (b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

#### **Appendix 4: Supporting documents and reference material**

Canterbury Earthquake Recovery Authority, [Land Use Recovery Plan Te Mahere Whakahaumanu Tāone](#), 2013

Canterbury Maps - [Home | Canterbury Maps](#)

Environment Canterbury, Proposed Change 1 to the Canterbury Regional Policy Statement, January 2021

Greater Christchurch Partnership, [Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga](#), July 2019

Greater Christchurch Partnership, [Housing and Business Development Capacity Assessment Te Arotake i te Whakawhanaketanga ā-Whare, ā-Umanga hoki](#), March 2018

Greater Christchurch Partnership, [Greater Christchurch Housing Capacity, Assessment: Reports 1 – 4](#), February 2018

Greater Christchurch Partnership, [Business Development Capacity Assessment](#), October 2018

Greater Christchurch Partnership, [Greater Christchurch Settlement Pattern Update - Options Assessment report](#) (version 1) (undated)

Greater Christchurch Partnership, [Greater Christchurch Urban Development Strategy](#), 2007

Greater Christchurch Partnership, [Greater Christchurch Urban Development Strategy Update](#), 2016

New Zealand Government, [National Policy Statement on Urban Development 2020](#), July 2020

New Zealand Government, [National Policy Statement on Urban Development Capacity 2016](#), December 2016

Ngai Tūāhuriri Runanga, Te Hapū o Ngāti Wheke (Rāpaki), Te Runanga o Koukourārata, Ōnuku Runanga, Wairewa Runanga, Te Taumutu Runanga, [Mahaanui Iwi Management Plan](#), 2013

Ministry for the Environment, [A guide to section 32 of the Resource Management Act](#), 2017

[Report and Recommendations of the Hearings Panel](#) for Our Space 2018-2048: Greater Christchurch Settlement Pattern Update *Whakahāngai O Te Hōrapa Nohoanga*, 5 June 2019

# Appendix 5: Our Space 2018-2048: Greater Christchurch Settlement Pattern Update - overview summary

## Our Space 2018 -2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga



Figure 2: Annual population growth rates



What key factors will influence our future and changing housing demand profile?

- Increase in the share of households with aged 65 years +**  
Projected to grow from currently 24% to 35% by 2048
- Growth in single person households**  
Number of households projected to increase by 10% by 2048
- Smaller average household sizes**  
Household size projected to decrease from 2.4 in the City, 2.0 in Selwyn and 2.6 in Waimakariri
- Share of housing demand likely to be met by multi-unit dwellings**  
62% of housing demand in the City, 18% in Selwyn and 23% in Waimakariri
- Growth in multi-person households**  
Number of households projected to increase by 30% by 2048
- Decrease in home ownership rates**  
71% of housing demand in the City will be met by private rentals, 33% in Selwyn and 58% in Waimakariri
- Share of all new households that will need housing under \$150,000 to buy or \$200/week to rent to be affordable**  
62% of new households in the City, 52% in Selwyn and 58% in Waimakariri
- Increase in share of households with a long term health condition or disability**  
Following national trends at a Greater Christchurch level, the proportion of people with a disability is projected to increase from 25% of the population in 2013 to 28% by 2038

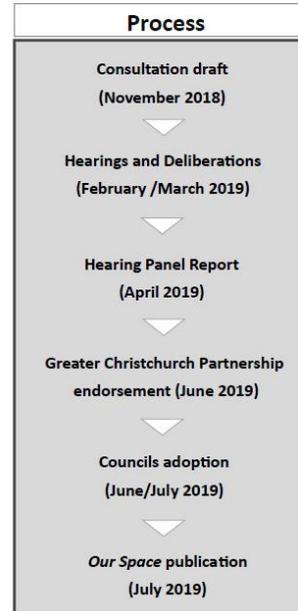


Table 2: Targets for housing development capacity in Greater Christchurch, 2018 - 2048

	Medium Term (2018-2028)	Long Term (2028-2048)	Total 30 Year Period
Christchurch City	17,400 (54%)	38,550 (71%)	55,950 (65%)
Selwyn	8,600 (27%)	8,600 (16%)	17,200 (20%)
Waimakariri	6,300 (19%)	7,050 (13%)	13,350 (15%)
Greater Christchurch	32,300	54,300	86,600

Table 3: Sufficiency of housing development capacity in Greater Christchurch against Housing Targets, 2018 - 2048

	Housing Development Capacity	Housing Target	Sufficiency of Housing Development Capacity	
			Medium Term (2018-2028)	Medium and Long Term (2018-2048)
Christchurch City	39,950*	55,950	+ 38,875	+ 4,000
Selwyn	9,725**	17,200	- 1,825***	- 5,475***
Waimakariri	4,200**	13,360	- 1,600***	- 7,675***
Greater Christchurch	73,875	86,600	+ 39,100***	- 9,150

Figure 12: Meeting housing demand through redevelopment and in greenfield locations



Table 4: Sufficiency of industrial and commercial development capacity in Greater Christchurch, 2018 - 2048

	Sufficiency of Industrial Development Capacity		Sufficiency of Commercial Development Capacity	
	Medium Term (2018-2028)	Medium and Long Term (2018-2048)	Medium Term (2018-2028)	Medium and Long Term (2018-2048)
Christchurch City	+ 665	+ 200	+ 30	- 135
Selwyn	+ 205 to + 230	+ 190 to + 220	- 5 to + 5	- 20 to - 10
Waimakariri	+ 60 to + 110	+ 45 to + 95	+ 5 to + 15	+ 5 to + 10
Greater Christchurch	+ 930 to + 1,005	+ 435 to + 515	+ 20 to + 50	- 160 to - 135

Figure 11: Where will housing growth be located?

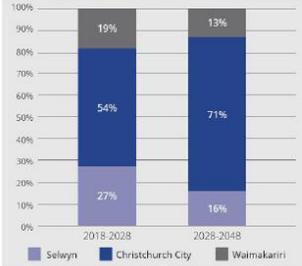


Figure 15: Proposed future development areas in Rolleston, Kaiapoi and Rangiora



Geographical area of focus of submissions

