



**Whakawhanake
Kāinga Komiti**

**Urban Growth Partnership
for Greater Christchurch**

Hearings Panel Greater Christchurch Spatial Plan AGENDA

Notice of Meeting:

The Greater Christchurch Spatial Plan Hearing will commence on:

Date: Thursday 26 October 2023
Time: 9 am
Venue: Council Chambers, Level 2, Civic Offices,
53 Hereford Street, Christchurch

Panel

Chairperson
Members

Stephen Daysh, Independent Chair
Gail Gordon, Mana Whenua
Councillor Grant Edge, Environment Canterbury
Councillor Victoria Henstock, Christchurch City Council
Councillor Nicole Reid, Selwyn District Council
Councillor Robbie Brine, Waimakariri District Council
Kate Styles, Central Government Representative (Ministry of Housing and Urban Development)

20 October 2023

Cathy Harlow
Democratic Services Advisor
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<https://www.ccc.govt.nz/the-council/meetings-agendas-and-minutes/>

Greater Christchurch Spatial Plan Hearings Panel Terms of Reference

Reporting to	Whakawhanake Kāinga Komiti
Membership	<ul style="list-style-type: none">• An Independent Chair of the Hearings Panel• One representative from Environment Canterbury• One representative from Christchurch City Council• One representative from Selwyn District Council• One representative from Waimakariri District Council• One representative on behalf of Mana whenua• One Central Government representative <p>The panel will have no provision for alternates</p>
Quorum	A quorum shall consist of at least five Panel members including the Independent Chair.
Objective	To consider and make recommendations on the submissions received to the Draft Greater Christchurch Spatial Plan

Context

In 2022, an Urban Growth Partnership for Greater Christchurch was established – the Whakawhanake Kāinga Komiti. This partnership of central government, local government and mana whenua which is focused on advancing shared objectives related to affordable housing, emissions reduction, and creating liveable and resilient urban areas.

The first priority of the partnership is the development of the Greater Christchurch Spatial Plan. The purpose of the Greater Christchurch Spatial Plan is to:

- Set a desired urban form for a projected population of 700,000 (to 2051) and beyond that to 1 million people to ensure our urban form is future-proofed in the context of population growth and climate change.
- Deliver on the first priority of the Urban Growth Partnership for Greater Christchurch to develop a Spatial Plan to improve the coordination and alignment between central government, local government and mana whenua.
- Satisfy the requirements of the National Policy Statement on Urban Development for the Greater Christchurch Councils to jointly prepare a Future Development Strategy.

Scope of Activity

1. To consider all submissions received in respect of the Draft Greater Christchurch Spatial Plan, including oral and/or online presentations from submitters wishing to be heard
2. To receive an officers' report (being the collective advice from the partner staff) in response to the matters raised through submissions.
3. Following the consideration of submissions, hearing from submitters, and receiving of an officers' report the Panel will hold deliberations and make recommendations, in a written report, to the Whakawhanake Kāinga Komiti on responses to submissions and changes to the Draft Greater Christchurch Spatial Plan as a result of the public consultation process.
4. The Independent Chair shall run the hearings, managing submitter presentation time, questions from the Panel and any procedural matters or communications.

Power to Act

1. Adopt and provide to submitters, appropriate procedures for hearing submissions and undertaking deliberations, including but not limited to determining appropriate:
 - a. Locations for the Panel to hear from submitters.
 - b. Timings allocated to submitters wishing to be heard
 - c. Any grouping of submissions to assist consideration by the Panel.
2. To conduct meetings for the purpose of hearing and considering submissions made on the Draft Greater Christchurch Spatial Plan.
3. Following the consideration of submissions, hearing from submitters, and receiving of an officers' report, the Panel will hold deliberations and make recommendations to the Greater Christchurch Partnership Committee in a written report on responses to submissions and changes to the Draft Greater Christchurch Spatial Plan as a result of the public consultation process.
4. The panel may seek legal advice from the Partnership's legal counsel as necessary to assist deliberations and enable it to make recommendations.
5. In the event that considerations on any particular submission or issues are not unanimous then the majority view of the panel shall be reflected as the Panel's recommendation. However, the dissenting view shall also be outlined in the recommendation report.

Power to Recommend

1. To make recommendations to the Whakawhanake Kāinga Komiti on responses to submissions and changes to the Draft Greater Christchurch Spatial Plan as a result of the public consultation process.

Discharge

1. The Greater Christchurch Spatial Plan Hearings Panel will be discharged at the point the final Greater Christchurch Spatial Plan is adopted by the Whakawhanake Kāinga Komiti Partners.

Hearing Panel administrative support

The Panel will be provided administrative and logistical support as appropriate in order to fulfil its function and terms of reference. Where this is not able to be provided by partner staff, external temporary resourcing will be provided.

AGENDA ITEMS

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4. Draft Greater Christchurch Spatial Plan - Volume of Submissions & Officers' Report on Submissions 9

5. Officers' Presentation
Officers will provide a high-level summary of submissions received on the Draft Greater Christchurch Spatial Plan consultation.

6. Consideration and Deliberation Ngā Whaiwhakaaro me Ngā Taukume o Ngā Kōrero158

Karakia Tīmatanga

Whakataka te hau ki te uru Whakataka te hau ki te tonga Kia mākinakina ki uta Kia mātaratara ki tai E hī ake ana te atakura He tio, he huka, he hauhūnga Tihei Mauri Ora	Cease the winds from the west Cease the winds from the south Let the breeze blow over the land Let the breeze blow over the ocean Let the red-tipped dawn come with a sharpened air. A touch of frost, a promise of a glorious day.
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1. Apologies Ngā Whakapāha

At the close of the agenda no apologies had been received.

2. Election of a Deputy Chairperson

At the start of the meeting a Deputy Chairperson will be elected.

3. Declarations of Interest Ngā Whakapuaki Aronga

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest they might have.

4. Draft Greater Christchurch Spatial Plan - Volume of Submissions & Officers' Report on Submissions

Reference / Te Tohutoro: 23/1688149

Report of / Te Pou

Cathy Harlow, Democratic Services Advisor,

Matua:

cathy.harlow@ccc.govt.nz

1. Purpose Te Pūtake Pūrongo

- 1.1 The purpose of this report is to provide the Hearing Panel with:
 - 1.1.1 All submissions received on the Draft Greater Christchurch Spatial Plan consultation.
 - 1.1.2 Draft Greater Christchurch Spatial Plan Officers' Report on Submissions of the draft Spatial Plan.
 - 1.1.3 A schedule of submitters who wish to speak to their submission during the Hearing.
- 1.2 The **volume of submissions** can be accessed here:
 - 1.2.1 [Volume of submissions 1 to 100](#)
 - 1.2.2 [Volume of submissions 101 to 200](#)
 - 1.2.3 [Volume of submissions 201 to 300](#)
 - 1.2.4 [Volume of submissions 301 to 369.](#)
- 1.3 The **Officers' Report** can be accessed here:
 - 1.3.1 [Draft Greater Christchurch Spatial Plan Officers' Report on Submissions of the draft Spatial Plan](#)
 - 1.3.2 [Appendix 1 – Submission Points by Theme \(with location of Officer response to submission points\)](#)
 - 1.3.3 [Appendix 2 – Submission Points by Submitter \(with location of Officer response to submission points\)](#)
 - 1.3.4 [Appendix 3 – Reporting Officer Recommendations](#)
 - 1.3.5 [Appendix 4 – Mark up of the draft Spatial Plan with recommended changes](#)
 - 1.3.6 [Appendix 5 – Experience and Qualifications.](#)
- 1.4 **Attachment A** contains a **schedule of submitters** who wish to speak to their submission during the Hearing (in speaking order)¹.
- 1.5 **Attachment B** contains the submissions of those scheduled to speak to the Hearing Panel on 26 October 2023.
- 1.6 Note that:
 - 1.6.1 The Greater Christchurch Spatial Plan will satisfy the requirement of the National Policy Statement on Urban Development 2020 – updated May 2022 (NPS-UD 2020) to prepare and make publicly available a Future Development Strategy (FDS).

¹ The schedule of submitters wishing to speak is subject to change. The agenda for each day of the Hearing will provide the most up-to-date schedule at the time of agenda publication. Further changes may be notified on the day.



- 1.6.2 Clause 3.15(1) of the NPS-UD 2020 provides that when preparing or updating an FDS local authorities must use the special consultative procedure in Section 83 of the Local Government Act 2002 (LGA 2002).
- 1.6.3 Section 82(1)(e) of the LGA 2020 requires, as one of the principles of consultation, that “the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration”.
- 1.7 When deliberating on submissions, the Hearing Panel should keep in mind the decision-making powers of the Whakawhanake Kāinga Komiti and Greater Christchurch Partnership members and the scope of the consultation materials. Significant changes from the original proposal may require further consultation.

2. Officer Recommendations Ngā Tūtohu

That the Greater Christchurch Spatial Plan Hearing Panel receives:

- the written submissions, including any late submissions, received on the Draft Greater Christchurch Spatial Plan consultation; and
- the Draft Greater Christchurch Spatial Plan Officers’ Report on Submissions of the draft Spatial Plan.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A 	Draft Greater Christchurch Spatial Plan - Schedule of Submitters wishing to speak to the Hearing Panel	23/1715091	12
B 	Volume of submissions - Submitters scheduled to speak on 26 October 2023	23/1719403	18

In addition to the attached documents, the following referenced documents are available:

Document Name – Location / File Link
<p>Volume of submissions:</p> <ul style="list-style-type: none"> Volume of submissions 1 to 100 (https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Volume-of-submissions-Draft-Greater-Christchurch-Spatial-Plan-Vol1-1-100_Optimized.pdf) Volume of submissions 101 to 200 (https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Volume-of-submissions-Draft-Greater-Christchurch-Spatial-Plan-101-200_Optimized_Optimized.pdf) Volume of submissions 201 to 300 (https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Volume-of-submissions-Draft-Greater-Christchurch-Spatial-Plan-201-300August-2023-Updates-v2.PDF) Volume of submissions 301 to 369 (https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Volume-of-submissions-Draft-Greater-Christchurch-Spatial-Plan-301-369_Optimized.pdf) <p>Draft Greater Christchurch Spatial Plan Officers’ Report on Submissions of the draft Spatial Plan (https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/GCSP-Draft-Officers-Report-Final-for-Circulation-2023-10-04.pdf)</p>

- [Appendix 1 – Submission Points by Theme \(with location of Officer response to submission points\)](https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-1-Submission-Points-by-Theme-with-location-of-Officer-response-to-submission-Points-20231004.pdf) (<https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-1-Submission-Points-by-Theme-with-location-of-Officer-response-to-submission-Points-20231004.pdf>)
- [Appendix 2 – Submission Points by Submitter \(with location of Officer response to submission points\)](https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-2-Submission-Points-by-Submitter-with-location-of-Officer-response-to-submission-Points-20231004.pdf) (<https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-2-Submission-Points-by-Submitter-with-location-of-Officer-response-to-submission-Points-20231004.pdf>)
- [Appendix 3 – Reporting Officer Recommendations](https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-3-Officers-Recommendations-final.pdf) (<https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-3-Officers-Recommendations-final.pdf>)
- [Appendix 4 – Mark up of the draft Spatial Plan with recommended changes](https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-4-Mark-Up-of-the-draft-Spatial-Plan-with-recommended-changes-Final-for-Circulation-20231004.pdf) (<https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-4-Mark-Up-of-the-draft-Spatial-Plan-with-recommended-changes-Final-for-Circulation-20231004.pdf>)
- [Appendix 5 – Experience and Qualifications](https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-5-Officer-Qualifications-and-Experience.pdf) (<https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Draft-GCSP/Appendix-5-Officer-Qualifications-and-Experience.pdf>).

Greater Christchurch Spatial Plan Hearing – Schedule of Submitters

Hearing Day: Thursday 26 October

#	Speaker	Organisation	Role	Hearing	Time
171	Christine Hetherington	Summerset Group Holdings Ltd		Thu 26 Oct - ChCh	10:30 am
329	Alex Booker	Foodstuffs (South Island) Properties Limited		Thu 26 Oct - ChCh	10:45 am
327	Alex Booker	Birchs Village Limited and WDL Enterprises Limited		Thu 26 Oct - ChCh	11:00 am
222	Graeme McCarrison	Spark, Chorus, One NZ, FortySouth and Connexa		Thu 26 Oct - ChCh	11:15 am
336	Hannah Marks Richard Moylan	Orion Group Limited		Thu 26 Oct - ChCh	11:30 am
351	Anne Scott	Spokes Canterbury	Submissions Coordinator	Thu 26 Oct - ChCh	11:45 am
175	Anne Scott			Thu 26 Oct - ChCh	12:00 pm
27	Chessa Crow			Thu 26 Oct - ChCh	12:10 pm
113	Ella McFarlane			Thu 26 Oct - ChCh	12:20 pm
295	Selena Coombe Jackie Howard	Styx Living Laboratory Trust, Partner of Community Waterways Partnerships	Environmental Advocacy Volunteer	Thu 26 Oct - ChCh	2:00 pm
301	David Hawke	Halswell Residents Association	Secretary	Thu 26 Oct - ChCh	2:15 pm
304	Patricia Harte	Urban Estates Ltd		Thu 26 Oct - ChCh	2:30 pm
330	Humphrey Tapper	Tapper Family Trust		Thu 26 Oct - ChCh	2:45 pm
300	Benjamin Love			Thu 26 Oct - ChCh	3:20 pm
149	David Lawry			Thu 26 Oct - ChCh	3:30 pm
119	Cameron Bradley			Thu 26 Oct - ChCh	3:40 pm
297	Fiona Bennetts			Thu 26 Oct - ChCh	3:50 pm

Hearing Day: Friday 27 October

#	Speaker	Organisation	Role	Hearing	Time
155	Holly Luzak	CVI Projects Limited	Henry McKay	Fri 27 - Waimak	9:15 am
342	Lynda Murchison	NZ Pork	Senior Environmental Advisor for Chief Executive	Fri 27 - Waimak	9:30 am
325	Rebecca Eng	Transpower New Zealand Limited	Technical Lead - Policy	Fri 27 - Waimak	9:45 am
263	Martin Pinkham			Fri 27 - Waimak	10:00 am
198	Ross Hebble		Paul Bryant	Fri 27 - ChCh	1:00 pm
271	Joanne Zervos			Fri 27 - ChCh	1:10 pm
247	Luke Chandler			Fri 27 - ChCh	1:20 pm
127	Joe Davies			Fri 27 - ChCh	1:30 pm
258	Brendon Harre			Fri 27 - ChCh	1:40 pm
294	Michael Blewett			Fri 27 - ChCh	1:50 pm
156	David H Ivory			Fri 27 - ChCh	2:00 pm
272	Tim Lindley			Fri 27 - ChCh	2:10 pm
364	Alan Grey			Fri 27 - ChCh	2:20 pm
151	David Daish			Fri 27 - ChCh	2:30 pm
281	Robina Dobbie			Fri 27 - ChCh	2:50 pm
291	Joe Holland			Fri 27 - ChCh	3:00 pm
255	Leanne Farrar			Fri 27 - ChCh	3:10 pm
352	Paul McMahon	Waitai Coastal- Burwood-Linwood Community Board	Chairperson	Fri 27 - ChCh	3:30 pm

Hearing Day: Monday 30 October

#	Speaker	Organisation	Role	Hearing	Time
201	James Riddoch	Property Council New Zealand		Mon 30 Oct - Selwyn	9:15 am
359	Ross Houliston	The Greater Hornby Residents Association	The Greater Hornby Residents Association	Mon 30 Oct - Selwyn	9:30 am
331	Phil/Tim Carter	Carter Group Limited		Mon 30 Oct - Selwyn	9:45 am
339	Andrew Mactier	Fletcher Living		Mon 30 Oct - Selwyn	10:00 am
340	Andrew Mactier	Hughes Developments Limited		Mon 30 Oct - Selwyn	10:15 am
362	Andrew Mactier	Danne Mora Ltd		Mon 30 Oct - Selwyn	10:30 am
341	Andrew Mactier	Independent Producers Limited		Mon 30 Oct - Selwyn	10:45 am
200	Donna Gillatt			Mon 30 Oct - Selwyn	11:15 am
184	Andrew Schulte	Hill Street Ltd		Mon 30 Oct - Selwyn	11:25 am
282	Rebekah Couper-Wain			Mon 30 Oct - Selwyn	11:40 am
104	Don Babe			Mon 30 Oct - Selwyn	11:45 am
241	Lawrence Manion			Mon 30 Oct - Selwyn	11:55 am
280	David Wilson			Mon 30 Oct - Selwyn	12:05 pm
235	Ian McIntosh			Mon 30 Oct - Selwyn	12:15 pm

Hearing Day: Thursday 2 November

#	Speaker	Organisation	Role	Hearing	Time
287	Paul Francis	Opal Consortia	Director	Thu 2 Nov - ChCh	9:15 am
363	David Duffy	Richmond Residents' and Business Association		Thu 2 Nov - ChCh	9:30 am
274	Anne Dingwall	Christchurch Civic Trust	Chair 100	Thu 2 Nov - ChCh	9:45 am
218	Felicity Hayman	Christchurch International Airport Ltd		Thu 2 Nov - ChCh	10:00 am
196	Holly Luzak	Cashmere Park Ltd, Hartward Investment Trust and Robert Brown		Thu 2 Nov - ChCh	10:15 am
260	Brigitte McKenzie-Rimmer	Landowners Group	Steering Committee member	Thu 2 Nov - ChCh	10:45 am
202	Adele Radburnd	ChristchurchNZ		Thu 2 Nov - ChCh	11:00 am
326	Sarah Eveleigh	Infinity Investment Group Holdings Limited		Thu 2 Nov - ChCh	11:15 am
302	Chris Ford	Disabled Persons		Thu 2 Nov - ChCh	11:30 am

#	Speaker	Organisation	Role	Hearing	Time
		Assembly (NZ) Inc			
219	Garreth Hayman		Doppelmayr NZ Ltd	Thu 2 Nov - ChCh	11:45 am
288	David East	North Beach Residents' Association	Co-chair, 4,000 residents	Thu 2 Nov - ChCh	12:00 pm
203	Christopher Kissling			Thu 2 Nov - ChCh	12:15 pm
199	George Laxton			Thu 2 Nov - ChCh	12:25 pm
234	Dianne Downward			Thu 2 Nov - ChCh	12:35 pm
240	Ross Clarke			Thu 2 Nov - ChCh	12:45 pm
210	Margo Perpick	Arumoni Developments Limited		Thu 2 Nov - ChCh	2:00 pm
347	Margo Perpick	Momentum Land Limited		Thu 2 Nov - ChCh	2:15 pm
348	Margo Perpick	Balance Developments Limited		Thu 2 Nov - ChCh	2:30 pm
214	Margo Perpick		Greg Gaba	Thu 2 Nov - ChCh	2:45 pm
115	Drucilla Kingi-Patterson John Council			Thu 2 Nov - ChCh	3:15 pm
212	Ingrid Mesman			Thu 2 Nov - ChCh	3:25 pm
206	Ann Satterthwaite		Leslie McAuley	Thu 2 Nov - ChCh	3:35 pm
80	Colin Meurk	Creative Transitions To Sustainable Futures		Thu 2 Nov - ChCh	3:45 pm
217	Davinia Sutton			Thu 2 Nov - ChCh	4:00 pm

Hearing Day: Friday 3 November

#	Speaker	Organisation	Role	Hearing	Time
314	Fiona Aston	Red Spur Limited		Fri 3 Nov - ChCh	9:15 am
320	Fiona Aston	Cockram Premises Limited		Fri 3 Nov - ChCh	9:30 am
321	Fiona Aston	Survus Consultants		Fri 3 Nov - ChCh	9:45 am
313	Fiona Aston	Miles Premises Ltd		Fri 3 Nov - ChCh	10:00 am
306	Fiona Aston	Equus Trust		Fri 3 Nov - ChCh	10:15 am
332	Phil de Joux	Lyttelton Port Company Limited		Fri 3 Nov - ChCh	10:30 am
310	Fiona		Richard & Geoff Spark	Fri 3 Nov - ChCh	11:00 am
318	Fiona Aston		Andrew McAllister	Fri 3 Nov - ChCh	11:10 am
311	Fiona Aston		Robbie McIlraith	Fri 3 Nov - ChCh	11:20 am
316	Fiona Aston		Lynn, Malcolm and Lynn Townsend and Stewart	Fri 3 Nov - ChCh	11:30 am
308	Fiona Aston		Rob Nicol	Fri 3 Nov - ChCh	11:40 am

#	Speaker	Organisation	Role	Hearing	Time
298	Jane McKenzie			Fri 3 Nov - ChCh	11:50 am
369	E and C Hobbs			Fri 3 Nov - ChCh	12:00 pm
187	Emma Norrish	Waipapa Papanui-Innes-Central Community Board	Chairperson	Fri 3 Nov - ChCh	1:15 pm
303	Callum Ward	Waihoru Spreydon-Cashmere-Heathcote Community Board	Chairperson	Fri 3 Nov - ChCh	1:30 pm
343	Helen Broughton	Waipuna Halswell-Hornby-Riccarton Community Board	Chairperson	Fri 3 Nov - ChCh	1:45 pm

Hearing Day: Saturday 4 November

#	Speaker	Organisation	Role	Hearing	Time
159	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Girls High School	Sat 4 Nov - ChCh	TBC
160	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Girls' High School	Sat 4 Nov - ChCh	TBC
161	Okirano Tilaia		GC2050 Facilitator - 5 Students from Christchurch Girls' High School	Sat 4 Nov - ChCh	TBC
162	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Girls' High School	Sat 4 Nov - ChCh	TBC
163	Okirano Tilaia		GC2050 Facilitator - 5 students for Christchurch Girls' High School	Sat 4 Nov - ChCh	TBC
165	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Girls' High School	Sat 4 Nov - ChCh	TBC
167	Okirano Tilaia		GC2050 Facilitator - 4 students from Rolleston High School	Sat 4 Nov - ChCh	TBC
168	Okirano Tilaia		GC2050 Facilitator - 4 students from Rolleston High School	Sat 4 Nov - ChCh	TBC
188	Okirano Tilaia		GC2050 Facilitator - 4 students from Rolleston High School	Sat 4 Nov - ChCh	TBC
189	Okirano Tilaia		GC2050 Facilitator - 4 students from Rolleston High School	Sat 4 Nov - ChCh	TBC

#	Speaker	Organisation	Role	Hearing	Time
190	Okirano Tilaia		GC2050 Facilitator - 15 students for Kaiapoi High School	Sat 4 Nov - ChCh	TBC
191	Okirano Tilaia		GC2050 Facilitator - 25 students from Papanui High School	Sat 4 Nov - ChCh	TBC
192	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Boys' High School	Sat 4 Nov - ChCh	TBC
193	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Boys' High School	Sat 4 Nov - ChCh	TBC
194	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Boys' High School	Sat 4 Nov - ChCh	TBC
195	Okirano Tilaia		GC2050 Facilitator - 5 students from Christchurch Boys' High School	Sat 4 Nov - ChCh	TBC
350	Okirano Tilaia		GC2050 Facilitator - 5 young people from University of Canterbury/Ara	Sat 4 Nov - ChCh	TBC
264	Amanda Kennedy	Environment Canterbury Youth Rōpū	Secretary, 16	Sat 4 Nov - ChCh	TBC
335	Emily Belton	Waimakariri Youth Council		Sat 4 Nov - ChCh	TBC
176	Molly Laurence	Selwyn Youth Council	Co- Chair (Selwyn Youth Council) 15 Members	Sat 4 Nov - ChCh	TBC
273	Aurora Garner-Randolph	School Strike 4 Climate	Key organiser	Sat 4 Nov - ChCh	TBC

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 20/07/2023

First name: Christine **Last name:** Hetherington

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Summerset Group Holdings Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
C16081E_FINAL_LODGED_Submission_Draft _Greater_Chch_Spatial_Plan 20230720

SUBMISSION ON DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: Whakawhanake Kāinga Komiti (Urban Growth Partnership for Greater Christchurch)

SUBMITTER: Summerset Group Holdings Limited ("Summerset")

SUBMISSION ON: Draft Greater Christchurch Spatial Plan ("DGCSP")

Summary

1. Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 7,400 residents living in our village communities. Summerset offers a range of independent living options and care, meaning that as the residents' needs change, they have support and options within the village. Summerset has 39 villages which are either completed or in development and a further 11 greenfield sites, spanning from Whangārei to Dunedin, and employs over 2,400 staff members across its various sites.
2. Summerset welcomes the opportunity to submit on the DGCSP, which proposes changes to the vision for how and where the greater Christchurch area is to grow over the next 30 years and beyond, to achieve the best outcomes for the region. Summerset is actively involved in land development (including resource consent and private plan change processes) across the Greater Christchurch area in relation to the development of high quality, comprehensive care retirement villages, which provide a range of living options for the elderly. Summerset currently operates 4 villages within the Greater Christchurch area (Prebbleton, Avonhead, Wigram and Cavendish) with an additional village consented and currently under construction (Rangiora). Summerset is also actively considering other potential site options. The average site size for these villages is approximately 6 hectares however more recent site purchases have been trending up and new sites are closer to 10 hectares in size.
3. In its current form, the DGCSP:
 - (a) does not fully recognise or properly provide for retirement living options (in greenfield, brownfield and intensification scenarios);
 - (b) applies overly blunt principles as 'opportunities' in a manner which is inconsistent with the provisions of current legislation and policy documents;
 - (c) places too much reliance on intensification anticipated to be enabled through Plan Change 14 ("PC14") to the Christchurch District Plan, and other plan changes currently under consideration by Waimakariri and Selwyn District Councils, to provide for that capacity, despite these still being in their infancy. The outcomes of

these process are yet to be determined and are not aimed at the full range of housing choices that the community needs; and

- (d) does not provide for well-functioning urban environments by failing to adequately consider the significant opportunities that greenfield development can provide for master planned, well-integrated development that requires larger land areas than are available within the existing urban framework.

Key Statutory Requirements

4. The draft Spatial Plan has been prepared under the Urban Growth Agenda, a central government programme to improve co ordination between central government, local government and mana whenua in high growth urban areas. Relevant national direction includes the National Policy Statement on Urban Development, Government Policy Statement on Housing and Urban Development, Government Policy Statement on Land Transport, the Emissions Reduction Plan, and other national policy statements relating to highly productive land and freshwater management.
5. The draft Spatial Plan satisfies the requirement of a future development strategy (FDS) under the National Policy Statement on Urban Development.
6. The NPS-UD sets out a prescriptive criterion of sources of information that must be considered in informing any FDS. This includes:
 - (a) the most recent applicable Housing and Business Development Capacity Assessment ("HBA");
 - (b) consideration of different spatial scenarios for achieving the purposes of the FDS;
 - (c) relevant long-term plans;
 - (d) infrastructure strategies or any other relevant plan or strategy;
 - (e) the feedback received from this consultation;
 - (f) every National Policy Statement; and
 - (g) any other relevant national policy required or issued under legislation.¹
7. Once an FDS is prepared, the Council will be required to have regard to it when preparing or changing RMA planning documents.² On that basis it has the potential to significantly influence RMA decision making processes.

¹ NPS-UD, clause 3.14.

² NPS-UD, clause 3.17.

8. The Plan set outs how well functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years. Summerset has a particular interest in the aspects of the Plan relating to well – functioning urban environments – in particular those which:

- *Have or enable a variety of homes that meet the needs, in terms of type, price and location of different households; and*
- *Have good accessibility for all people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport; and*
- *Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- *Support reductions in greenhouse gas emissions; and*
- *Are resilient to the likely current and future effects of climate change. (p23)*

Providing for Sufficient Development Capacity

9. As mentioned above, the DGCSP is required to set out how the Council intends to provide at least sufficient development capacity (as required under the NPS-UD) over the next 30 years. In order to be considered as *sufficient* development capacity, under the NPS-UD, development capacity must be plan enabled, infrastructure ready, feasible and reasonably expected to be realised (or for business land, suitable to meet the demands of different business sectors) and meet the expected demand plus the appropriate competitiveness margin.³
10. The DGCSP estimates that if Greater Christchurch was to grow at the rate seen over the last 15 years, then it could reach a population of 700,000 within the next 25 to 30 years, and one million within the next 60 years, doubling the size of today's population (p26).
11. The document states that *'meeting the projected demand for housing over the next 30 years is not a major issue for Greater Christchurch. This is particularly with additional greenfield areas being recently rezoned through private plan changes, and further intensification enabled across the city region as required by the National Policy Statement on Urban Development and Resource Management (Enabling Housing Supply and Other Matters) Amendment Act. In addition to these recent rezonings, greenfield areas are also being considered through rezoning submissions on the Selwyn and Waimakariri District Plan Review processes – the outcomes of which are yet to be determined'.*

³ NPS-UD, clause 3.2(2) and 3.3(2).

12. Longer term shortfalls are stated to be met by exploring the feasibility of intensification and the 'unlocking' of identified priority areas. Summerset considers that the DGCSP:

- (i) Fails to adequately consider and provide for the needs and housing demand of elderly persons and an ageing population;
- (ii) Places an overwhelming reliance on meeting stated demand capacity through intensification (particularly that in close proximity to identified centres and public transportation corridors), including that proposed to be rezoned through plan changes currently being processed by Selwyn, Waimakariri and Christchurch City Councils (the outcomes of which have not yet been determined);

Summerset considers that sufficient consideration has not been given to enabling for the future development of greenfield sites in the circumstances where these are necessary to meet the growth and choice needs of the community; and

- (iii) Fails to address the demand for specific types of development capacity to meet the range of different housing choices needed, including specific provision for retirement villages in greenfield areas.

Provision for Greenfield Development

13. The DGCSP provides for greenfield development to the extent that '*housing capacity must achieve and not undermine other directions and principles. To achieve this, successful future greenfield development needs to:*

- i. Be well connected with employment, services and leisure through public and active transport networks; and*
- ii. Be integrated with existing urban areas; and*
- iii. Meet a need identified by the latest Housing and Business Development Capacity Assessment; and*
- iv. Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities (p72).*

14. Summerset supports the continued recognition of the need for greenfield development. However, clause iv, combined with the identified areas to 'protect, avoid and enhance' in Part 1 of the Plan, effectively limits land use activities requiring larger areas of land and restricts large swathes of the Greater Christchurch area from further development.

15. Map 2 of the Strategy provides a visual presentation of the strategy for the 30+ years scenario (ie 1 million people). This, combined with Map 5 (areas to protect and avoid) visually depicts limitations on the areas available for greenfield development should the Plan be adopted.
16. Summerset acknowledges the need to 'protect, avoid and enhance' areas in accordance with existing statutory requirements. However, it considers that the manner in which these 'instruments' are proposed to be applied are blunt and do not recognise the nuances of the various values/ features. On face value these effectively 'lock up' areas from development without acknowledging the provisions of current legislation which provide for and enable appropriate development within these areas in certain circumstances. The result of this is evident in Map 5 which is a graphic representation of the cumulative layering of these constraints. This covers large swathes of the Greater Christchurch Area.
17. Summerset considers that 'blunt' instruments have been utilised in relation to matters such as:

- Direction 2.1 (057): *Focus and incentivise growth in areas free from significant risks from natural hazards.* The Plan distinguishes between areas subject to natural hazard risks (map 7) and areas subject to negotiable natural hazard risks (Map 8).

Summerset is supportive of the approach to generally avoid areas of high natural hazard risk and the distinction between these and areas of 'negotiable natural hazard risk'. There are a range of existing incentives on landowners and developers to ensure that any future development occurs in a way that appropriately manages such risks.

In developing its approach to managing development in areas subject to hazards, the Council must consider other incentives on developers to build high-quality developments that address, manage, and mitigate hazards, for example, more stringent building standards needing to be met for obtaining building consent, or insurance. Further work on a consistent, national approach to managing development in hazard risk areas, and managed retreat, is also expected to occur through the new Climate Change Adaptation Act.

- The protection of strategic infrastructure. Strategic infrastructure identified on Map 9 includes land within the 50 and 55 dBA 'noise control zones', special purpose infrastructure zones, port operations and port influence, local and national grid power lines, and State Highway and road corridors.

Text associated with Map 9 refers to the 'avoidance' of urban development around strategic infrastructure 'to ensure the safety and wellbeing of residents, and to safeguard the effective operation, maintenance and potential for upgrades of this

infrastructure'. Current legislation does not provide for the outright 'protection' of strategic infrastructure nor direct urban development to 'avoid' such areas. Summerset considers that this is an overly generic way of approaching this matter and does not reflect the ability to mitigate the effects of development through mechanisms such as noise insulation and careful site planning.

Further, the reference to 'potential for upgrades' of such infrastructure provides no certainty as to the associated implications of this 'opportunity'. Summerset reserves the right to comment on such matters, including any revisions of the air noise contours identified in the DGCSP.

Summerset considers that a high-level assessment of strategic infrastructure within the region, and its associated requirements in the short, medium and long term, should be undertaken and made available to the public prior to the Greater Christchurch Spatial Plan becoming operative. This would provide the public with an opportunity to have visibility over this matter and enable a more informed assessment of the potential implications of such.

- Direction 3.1: '*avoid development in areas with significant natural values*' (p61). Map 10 identifies a number of environment areas and features. This mapping appears to include includes all water bodies (Including stormwater basins), protected places, landscape and features, open space zones and significant landscapes (which includes areas of ecological significance and significant rural landscapes). It is stated that 'it is important that any possible encroachment of development on these areas is avoided or involves early engagement and agreement with mana whenua'.

Summerset does not consider that this approach is consistent with the provisions of existing national policy direction. For example

- Part II of the RMA makes provision for the protection of outstanding natural features and landscapes from inappropriate subdivision use, and development' (Section 6(b)).
- The NPS – FW refers to the 'significant values of outstanding water bodies are protected' (Policy 8)
- Section 3.24 of the NPS- FW provides that regional councils must include rules in a plan such that the loss of river extent and values is avoided unless the Council is satisfied that (i) there is a functional need for an activity in that location; and (ii) the effects of the activity are managed by applying the effects management hierarchy, and

- The NES – FW (2022) provides for vegetation clearance and earthworks or land disturbance within or within a 10m setback from a natural inland wetland as a restricted discretionary activity if it is for the purpose of urban development (Clause 45C (1) and (2));

- Direction 3.4: '*protect highly productive land for food production*' (p61). Policy 5 of the NPS- HL states that the 'urban zoning of highly productive land is avoided, except as provided for in this National Policy Statement'. Similarly, Policy 8 states that 'highly productive land is protected from inappropriate subdivision, use and development'.

Summerset is concerned that proposed direction 3.4 of the DGCSP, in conjunction with the 'exploration' of a green belt around urban areas (3.5, p61), will significantly restrict any land development outside the current urban area boundaries.

- Direction 3.2 '*prioritise the health and wellbeing of water bodies*'. Summerset has a concern that the stated protection of the groundwater protection zone is again a blunt statement which does not acknowledge mechanisms/instruments available to prevent contamination of groundwater.

18. Summerset generally supports the acknowledgement that '*... the intensification focus needs to be combined with continuing to provide for some greenfield areas in appropriate locations*' (p70), however Summerset considers that this wording should be strengthened to refer to the provision of 'sufficient' greenfield areas. Further, Summerset considers that more detailed consideration should be given to the identification of additional priority areas specifically to provide for the necessary range of housing typologies, and as based on the points raised in this submission.

19. Significant benefits can be provided from greenfield development, including:

- opportunities for integrated, master-planned developments that better utilise land for open space and community areas, active transport modes, and other engineering; and
- provision of a greater variety of housing choices to meet the needs of the communities. For example, the housing needs of the elderly, those with disabilities, and young families are each going to be very different.

Demand for Specific Types of Development Capacity – Diverse and Affordable Housing

20. Summerset broadly supports the intention of the DGCSP to enable diverse and affordable housing within the Greater Christchurch area 'in locations that support thriving neighbourhoods that provide for people's day- to – day needs' (Opportunity 4).

21. Summerset's primary concern with this aspect of the DGCSP is that the demand for aged persons housing has not been sufficiently recognised, assessed nor addressed in the Plan.
22. The Greater Christchurch Housing Development Capacity Assessment (March 2023⁴) makes limited reference to retirement villages. An analysis of plan enabled theoretical and expected capacity for Christchurch City notes that *'Retirement villages are permitted activities throughout the Residential Suburban Zone and could also increase the total theoretical capacity, however more detailed analysis work is required to understand and identify future potential retirement village locations and significance on capacity. Therefore, retirement villages are currently excluded from the capacity assessment density calculation'* (p47). Notes on meetings with developers in Selwyn District contained in this document make reference to feedback received that there is a growing demand for retirement [f]or lifestyle villages, which presents housing choice and a general trend observed of wanting to live closer to family since 2019 (p16).
23. Further, the commercial feasible capacity information contained does not assess the feasibility of retirement care, government (Kainga Ora), community providers and private builds (p76). Summerset considers that the modelling and associated demand capacity for retirement living options within the Greater Christchurch area has not been fully considered. Additionally, any assessment should distinguish between *comprehensive care* retirement villages and *lifestyle* villages. Comprehensive care retirement villages provide residential aged care on site (the provision of which in New Zealand is currently at a crisis point). These are required to be developed at a sufficient scale [in terms of both resident numbers and site areas] to be viable, which is not readily achievable in many brownfield areas.
24. The DGCSP does not sufficiently recognise the nuances associated with aged care (in particular retirement village living). Figure 10 clearly identifies a projected increase in persons aged 65 and over in the period 2018 – 2073. However, the associated commentary refers to an aging population only in the context of intensification: *'Greater intensification around centres and along public transport routes will help provide a range of dwelling types to meet the changing demand profile in Greater Christchurch, particularly from an aging population. This includes providing for the projected higher demand for smaller, more affordable units'* (p70). The stated move towards medium and higher density housing needs to consider the way in which retirement villages fit into the spectrum of housing choices available and the need for substantial land areas to develop comprehensive care retirement villages.
25. The housing typologies by density outlined in Figure 11 do not recognise the nuances of the requirements of comprehensive care retirement villages, which typically require large sites with a low-density appearance (but with a higher population density). Further, the typologies

This is the most recent applicable HBDCA included as a background document for the DGCSP.

do not recognise the health and transportation needs and mobility restrictions of residents of these villages.

Figure 11: Housing typologies by density



26. Summerset is concerned that the DGCSP has inadequately considered the needs of elderly persons or the type of housing demand that elderly persons have, and therefore has not adequately provided for housing that will meet their needs in the future. The DGCSP does not explicitly indicate that these housing typologies have different land requirements and locational attributes from other more 'typical' residential housing or even lifestyle retirement villages. Forcing retirement villages to align with other housing typologies will not enable such activities.

Infrastructure Funding Constraints

27. Under the NPS-UD, development capacity is considered infrastructure ready if:
- in relation to the short term, there is adequate existing development infrastructure to support the development of land;
 - in relation to the medium term, there is adequate existing development infrastructure available to support the development of land or funding for that adequate development infrastructure has been identified in the long-term plan; and

- (c) in relation to the long term, funding for adequate development infrastructure has been identified in the long-term plan, or the development infrastructure to support the development capacity is identified in the Council's infrastructure strategy.
28. Summerset acknowledges that infrastructure investment is a complex challenge that requires a good understanding of development needs in the short, medium and long term. However, while often new greenfield developments have higher infrastructure costs upfront in the short term, which are then paid for over time through development contributions, it can provide more significant and cost-effective benefits over the longer term.
29. In many cases, brownfield development can be subject to the same, or more significant infrastructure constraints. Many brownfield areas are already over-capacity, which may impact their feasibility for future upgrades (and therefore, tying into the development capacity of an area), and these should all be factors that urge Council to exercise more nuanced decision-making in relation to infrastructure investment. The end result of such an approach of favouring infill development (as proposed under the DGCSP), may again lead to perverse outcomes from an infrastructure perspective, whereby old assets are attempted to be upgraded solely to try and keep up with capacity only to be at the mercy of what is an aging asset. A balanced and nuanced approach better serves growing cities.
30. The DGCSP does prioritise some areas for development over the life of the Plan, primarily the priority areas identified in Map 4. The timing of this is stated 'to be determined'. Summerset considers that this lack of certainty provides a hinderance to the identification of potential development options within the Greater Christchurch area.

Plan Review

31. The DGCSP is intended to be reviewed every 5 years. Summerset supports such a review, however, considers that this should also be tied into a review of the relevant District and Regional planning documents (whatever the future form of these may be); and that the timing of the review and updating of the joint work programme should, at a minimum, coincide with such. The DGCSP should also be explicitly integrated with the Long Term Plans for the three Councils (to enable infrastructure provision) and with any Council based planning on infrastructure and open space provision.

Relief Sought

32. Summerset seeks that the DGCSP:
- (a) recognises and makes adequate provision for the needs of, and lifestyle options sought by, an aged and ageing population;
 - (b) provides for a nuanced and effects-based approach to:

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Submission on Draft Greater Christchurch Spatial Plan

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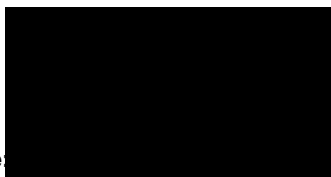
- (i) identified 'areas to protect, avoid and enhance';
- (ii) infrastructure constraints; and
- (iii) other development constraints noted in the DGCSP;

which enables development in a manner consistent with existing legislative and policy requirements;

- (c) provides for the recognition of additional greenfield priority growth areas to ensure adequate provision is made for varying demands and needs of all aspects of the population, including comprehensive care requirements for aged persons;
- (d) otherwise ensures that appropriate greenfield development capacity is enabled, particularly for master planned comprehensive care retirement villages that cater for the housing needs of an aged and ageing population.

33. Summerset would be open to engaging further with the Greater Christchurch Partnership on the matters raised in this submission. Given the status of this Plan in influencing the future strategic direction of development in the Greater Christchurch area, Summerset considers that public hearings on this Plan should be held. Summerset would like the opportunity to present evidence at any such hearings.

Signature:



Oliver Boyd, National Development Manager

For, and on behalf of, Summerset Group Holdings Limited

Dated: 20 July 2023

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Alex **Last name:** Booker

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Foodstuffs (South Island) Properties Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☐ Yes

☒ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Submission - Greater Christchurch Spatial Plan - Foodstuffs

SUBMISSION
Greater Christchurch Spatial Plan

Submission of Foodstuffs (South Island) Properties Limited

To: Greater Christchurch Spatial Plan Consultation
 Greater Christchurch Partnership
 PO Box 73014
 Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Name of submitter: Foodstuffs (South Island) Properties Limited

Address: c/- Anderson Lloyd

[REDACTED]
 [REDACTED]

[REDACTED]

Introduction

- 1 Foodstuffs is a retailer owned co-operative company and the wholesale supplier to retail brands such as PAK'nSAVE, New World, Four Square, Raeward Fresh and On-the-Spot. Foodstuffs (South Island) Properties Limited is a property holding company and wholly owned subsidiary of parent company Foodstuffs. Foodstuffs' activities in the Greater Christchurch area range from small retail stores to mid-size stores in shopping centres to large format retailing in supermarkets to industrial wholesaling, as well as a host of ancillary activities.
- 2 Supermarkets (including associated access and car parking areas) are of a functional nature, design and scale that distinguish them from most other activities in a commercial area. Amenity can be achieved through landscaping, building setbacks, variations in frontages, discrete loading operations, and safe and legible pedestrian access that enable functional supermarket developments to be established in a way that takes account of site-specific circumstances. Foodstuffs prides itself on supermarket operations that are planned in a way that is both practical and achieves high quality design and amenity outcomes.
- 3 Supermarkets provide an essential service for all New Zealanders as they ensure everyone has access to everyday essential grocery items required by consumers. Supermarkets also play a critical role during emergency situations including support in times of crisis such as natural disasters. This "essential" function came to the fore during the Covid-19 pandemic where government sanctioned supermarkets to open as an essential service, so that consumers had seamless access to food and other groceries.

Submission

- 4 The Greater Christchurch Spatial Plan (**GCSP**) is a draft plan for consultation which sets out the vision for the future of Greater Christchurch, and a pathway for how the city will be a well-functioning urban environment. The Spatial Plan expressly acknowledges that coordinated action with infrastructure providers and the development sector will be of particular importance to enabling the type and scale of development needed to achieve the desired pattern of growth, and *"it will be crucial that investments are aligned with the planned direction set out in the Spatial Plan"*.
- 5 Foodstuffs is concerned that the GCSP in its current form does not give effect to the National Policy Statement for Urban Development 2020 (**NPS-UD**). The NPS-UD is designed to improve responsiveness¹ in decisions that affect an urban environment and recognises the national significance of:
- (a) 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 in the future;
 - (b) providing *as a minimum* sufficient development capacity *at all times* to meet the different needs of people and communities.
- 6 The NPS-UD requires a well-functioning urban environment to, as a minimum, enable suitable sites (in terms of both location and size) for business activities to be realised and supported by an associated policy framework. Businesses should be built in places close to jobs, community services and public transport and where they respond to market demand. The GCSP needs to be future focussed, and needs to have sufficient flexibility for planning instruments to be able to be responsive.
- 7 For context, the Recommendations and Decisions report for the NPS-UD states, in relation to responsiveness²:
- Urban areas are dynamic and complex, continually changing in response to wider economic and social change. **The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply or incentivise land banking.** The intent of the responsive planning provisions in the National Policy Statement on Urban Development (NPS-UD) is to:
- enable the planning system to work responsively towards more competitive development markets, through developments at scale
 - ensure that plan change requests are considered on their own merits, irrespective of infrastructure funding constraints, and to ensure that decision-making supports developments that are of scale and contribute to well-functioning urban environments.
- 8 Foodstuffs is particularly interested in Opportunity 5 of the Spatial Plan. This seeks to provide space for businesses and the economy to prosper in a low carbon future. However, Directions 5.1-5.2 focus on integration with transport links and the centres networks – a very limited area.

¹ NPS-UD Objective 6

² Ministry of Housing and Urban Development and Ministry for the Environment *Recommendations and decisions report of the National Policy Statement on Urban Development*: <https://environment.govt.nz/assets/Publications/Files/Recommendations-and-decisions-report-NPS-UD-final.pdf>, at [59].

- 9 Direction 5.1 provides:
- Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network
- 10 While Foodstuffs generally supports Direction 5.1 as a primary focus, there are also a range of commercial activities outside of the transport links and centres networks. Supermarkets have specific operational and functional needs which often see them located in residential urban areas in direct response market need. Examples of this include New World St Martins, New World Ilam and the recently consented Pak'n'Save Rolleston.
- 11 The commentary for Direction 5.1 provides:
- Enough commercial land is also supplied in Christchurch, Selwyn and Waimakariri to meet demand over the next 10 years, but there is a shortfall of 110ha in Christchurch and 20ha in Selwyn when looking over the next 30 years. Shortfalls in commercial land are expected to be met through intensification in significant urban centres, major towns, as well as rezoning of industrial land close to Christchurch's Central City to commercial and mixed-use. A focus for providing for commercial land will be those areas identified in Map 14, including the Priority Areas.
- 12 The assessment of capacity of commercial land in the Spatial Plan does not accurately reflect the market reality for Foodstuffs activities. By way of example, Foodstuffs has very recently gone through the Proposed Selwyn District Plan process. During the hearing, the economists representing both Foodstuffs and the Council both agreed there is demand for several additional district supermarkets and that there is *insufficient space* to accommodate them within existing centres, and there was no scope to provide rezoned commercial land for supermarkets through that process and submissions. There is a need and demand for supermarket activities to support residential catchments, and a need to provide for new commercial zones to support intensification.
- 13 For the GCSP to only encourage and enable commercial development within centres and transport corridors means that a range of commercial activities may not be enabled. These commercial activities range from small retail shops and services like dairies, florists and hairdressers to large format retailers such as supermarkets. These commercial activities primarily service the surrounding community and so they should be acknowledged and supported in the GCSP as well. There should also be express acknowledgement in the Spatial Plan that commercial activities with functional or operational needs can still support a centre through locating outside and near them.
- 14 Direction 5.2 provides:
- A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services
- 15 It is unclear how Direction 5.2 will be implemented and what it practically means for a commercial activity. For example, will it mean a new commercial activity such as a supermarket (which is the equivalent to a local centre in Christchurch City under PC14) needs to demonstrate its value against the Greater Christchurch centre's network? What economic assets are being leveraged and how? It is also unclear why the GCSP does not align with the treatment of urban areas in the district plans (applying the National Planning Standards terminology) which require councils to apply the 'centres hierarchy' from neighbourhood centres up to city centre zones, and why GCSP only identifies 14 centres across the entire Greater Christchurch area.
- 16 Policy 3 of the NPS-UD requires Greater Christchurch to have or enable intensification around neighbourhood, local and town centre zones in order to provide services for communities and to reduce greenhouse gas emissions from private car travel. This is reflected in Direction 4.3 the residential growth perspective. However, the GCSP needs to provide for the corresponding commercial activity within communities to meet the growth in needs.

- 17 At the high level of a spatial plan, it is not necessary to identify every one of these commercial activity centres. However, it is necessary to acknowledge that not all commercial activity is required nor should be located in the centres as identified in the GCSP.
- 18 Foodstuffs submit the following Directions should replace Direction 5.1:

At least sufficient land is provided for commercial and industrial uses at all times. ~~well integrated with transport links and the centres network~~

Encourage commercial and industrial uses to be integrated with transport links and centres.

Ensure sufficient land is provided for commercial and industrial uses with functional or operational needs, including outside of the centres network.

Spatial Plan structure and future focus

- 19 The Spatial Plan appears to be a Future Development Strategy (**FDS**) but in its current form it is deficient in the mandatory requirements of a FDS.
- 20 Clause 3.13 of the NPS-UD specifies that purpose and content of an FDS, and provides that:

(1) The purpose of an FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

- 21 Clause 3.3 of the NPS-UD is relevant to sufficient development capacity for business land (emphasis added):

(1) Every tier 1, 2, and 3 local authority must provide **at least** sufficient development capacity in its region or district to meet the **expected demand for business land**:

(a) from **different business sectors**; and

(b) **in the short term, medium term, and long term**.

In order to be **sufficient** to meet expected demand for business land, the development capacity provided must be:

- (a) plan-enabled (see clause 3.4(1)); and
- (b) infrastructure-ready (see clause 3.4(3)); and
- (c) **suitable** (as described in clause 3.29(2)) **to meet the demands of different business sectors** (as described in clause 3.28(3)); and
- (d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22).

- 22 The Spatial Plan doesn't provide for sufficient development capacity over the short, medium and long term, including for different business sectors. Only a coarse (as opposed to fine grain) analysis of capacity is provided in the Spatial Plan. By not identifying broad locations where needed new development capacity will be provided over the long term it does not achieve the purpose of an FDS. It also does not meet other requirements of a FDS for review and implementation. The Spatial Plan lacks flexibility and seems to be simply mostly showing the existing urban areas and approved rezoned areas. There are no measurable actions or measurements of whether it does (or can) achieve feasible future development.
- 23 When it comes to implement the Spatial Plan through the lower order planning documents, and if it has been determined there is insufficient development capacity (as described in 3.3 above), Clause 3.7 requires a change to RMA planning documents asap and a local authority must consider other options for increasing development capacity and otherwise enabling development. This is the future vision that needs to be provided now in the Spatial Plan.

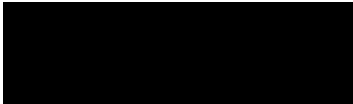
Other matters

- 24 *South Christchurch growth* - Foodstuffs supports the recognition of South of the Central City as a key business area. Map 2, showing the locations of growth capacity for the 1 million population projection, recognises the Colombo Street corridor as a growth area. Map 14, showing growth capacity for 700,000 people, does not recognise this corridor and should. A growth area should be provided for South Christchurch, something that is currently absent from Map 14.
- 25 *Rolleston centre* - The growth area on Map 14 for Rolleston should be extended to include 157 Levi Road which includes the recently consented Pak'nSave Rolleston.
- 26 *Office activity in industrial areas* - Foodstuffs supports the use of industrial land for commercial activity associated with an industrial use (such as accompanying offices) as a way to provide additional land suitable for commercial activities.
- 27 *Reverse sensitivity* - Opportunity 4 focusses on giving effect to the residential intensification directed by Policy 1 of the NPS-UD. Foodstuffs is supportive of well-planned residential growth and intensification. It is concerned that in some instances it has the unintended consequence of constraining the efficient use of limited business land.

For example, Supermarkets have specific operational and functional requirements which include delivery vehicles movements and associated noise, large store sizes; generators and other specialised equipment; car park, signage and store lighting to ensure the safety and security of staff and customers at night; and longer operational hours. Where new residential activity and growth is proposed in close proximity to commercial activities it should be recognised that this may detract from amenity values appreciated by some people but this is not to be considered an adverse amenity effect.

Protection from reverse sensitivity is done well in relation to the effective operation of the freight network in Direction 6.5. Ensuring there are no reverse sensitivity effects on the freight network from residential development is vital.

Date: 21 July 2023



Alex Booker for Foodstuffs (South Island) Properties Limited

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Alex **Last name:** Booker

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Birchs Village Limited and WDL Enterprises Limited

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Submission - GCSP - BVL

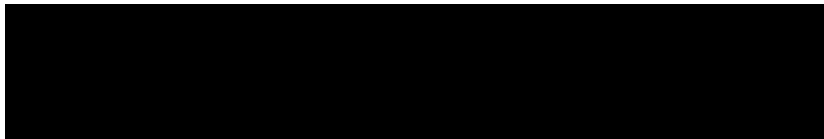
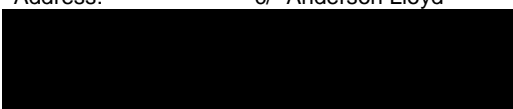
SUBMISSION
Greater Christchurch Spatial Plan

Submission of Birchs Village Limited and WDL Enterprises Limited

To: Greater Christchurch Spatial Plan Consultation
 Greater Christchurch Partnership
 PO Box 73014
 Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Name of submitter: Birchs Village Limited and WDL Enterprises Limited
 Address: c/- Anderson Lloyd



Introduction

- 1 Birchs Village Limited and WDL Enterprises Limited (**the Submitter**) is a residential land developer in the Selwyn District and Christchurch City.
- 2 The Spatial Plan is a draft plan for consultation which sets out the vision for the future of Greater Christchurch, and a pathway for how the city will be a well-functioning urban environment. The Spatial Plan expressly acknowledges that coordinated action with infrastructure providers and the development sector will be of particular importance to enabling the type and scale of development needed to achieve "*the desired pattern of growth*", and "*it will be crucial that investments are aligned with the planned direction set out in the Spatial Plan*".
- 3 It is submitted it is important to understand the current proposed land development that has been signalled by developers in direct response to community demand and the National Policy Statement for Urban Development 2020 (**NPS-UD**). Currently, the Spatial Plan only focuses growth through targeted intensification in existing urban and town centres and along public transport routes, regardless of its short, medium and potential long-term feasibility. It assesses capacity across the entire Greater Christchurch area, and not within areas of high demand. It makes insufficient provision for greenfield development or criteria which would enable future growth, and only identifies areas for future development which have already been effectively confirmed through planning documents and captured in capacity figures.

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- 4 It is submitted that such an approach is inadequate for a future focussed and strategy document and does not properly give effect to NPS-UD.

Submission

- 5 The Spatial Plan seeks to provide for the projected growth of Greater Christchurch in the next 60 years, which is essentially a doubling of today's population, to 1 million people. The Spatial Plan is informed by coarse capacity figures which are applied across the entire Greater Christchurch area, and are based on plan enabled and Council desired infill capacity, but not on actual feasibility.
- 6 The NPS-UD is designed to improve responsiveness¹ in decisions that affect an urban environment and recognises the national significance of:
- (a) 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 in the future;
 - (b) providing *as a minimum* sufficient development capacity *at all times* to meet the different needs of people and communities².
- 7 A key method of achieving responsiveness in the NPS-UD, was to direct local authorities to be responsive to plan changes that would add significantly to development capacity, even if that capacity is unanticipated by RMA planning documents or out-of-sequence with planned land release (Policy 8).
- 8 For context, the Recommendations and Decisions report for the NPS-UD states, in relation to responsiveness³:

Urban areas are dynamic and complex, continually changing in response to wider economic and social change. **The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply or incentivise land banking.** The intent of the responsive planning provisions in the National Policy Statement on Urban Development (NPS-UD) is to:

- enable the planning system to work responsively towards more competitive development markets, through developments at scale
- **ensure that plan change requests are considered on their own merits, irrespective of infrastructure funding constraints, and to ensure that decision-making supports developments that are of scale and contribute to well-functioning urban environments.**

...

¹ NPS-UD Objective 6

² Such as type, price and location of households (NPS-UD, Policy 1(a)(i)).

³ Ministry of Housing and Urban Development and Ministry for the Environment *Recommendations and decisions report of the National Policy Statement on Urban Development*: <https://environment.govt.nz/assets/Publications/Files/Recommendations-and-decisions-report-NPS-UD-final.pdf>, at [59].

The [responsiveness] policy would recognise the benefits of plan changes that would add significantly to development capacity and contribute to well-functioning urban environments. Because the intent is responsiveness in the planning system, this would apply to both greenfield and brownfield developments. Significance would be determined by councils and could include development capacity significant to Māori that contributes to a well-functioning urban environment and has the necessary transport connections.

- 9 It is submitted, the Spatial Plan is inconsistent with the NPS-UD, for example:
- (a) Direction 4.2 - Ensure sufficient development capacity is provided or planned to meet demand. This does not reflect the NPS-UD requirement to provide *at least* sufficient *feasible* development capacity at all times, and needs to be amended.
 - (b) Direction 4.3 - Focus and incentivise intensification of housing to areas that support the *desired* pattern of growth. This does not give effect to Objective 3 NPS-UD which seeks to enable more people to live in areas of an urban environment in which there is a high demand for housing relative to other areas within the urban environment. The Submitter is concerned that Council "desired" growth has not appropriately considered actual demand from the development community, where people want to live, or demonstrated how it will actually achieve the extensive capacity said to be achieved through intensification of existing urban areas. Direction 4.3 should be deleted. The rate and extent which intensification can be achieved should be realistic, and it should not be incentivised by failing to provide for other development in areas of demand (such as greenfield development), effectively reinforcing the urban boundary of the Regional Policy Statement.
 - (c) Direction 4.4 - Provide housing choice and affordability. The focus on intensification of existing urban areas fails to take advantage of the unique potential for greenfield development to provide higher density development supported by comprehensive urban design, delivered in a way that significantly contributes to housing capacity. Those outcomes are much harder to achieve through sporadic infill. Figure 9 of the Spatial Plan shows that demand for housing capacity in Selwyn is outstripping supply. No new Future Urban Development Areas (FUDA) have been identified beyond those that currently exist. Direction 4.4 needs to be amended to specifically provide for recognition of greenfield development.

The provision for new greenfield areas:

- 10 Given the significant anticipated population growth for Greater Christchurch, the identification of where growth should go is critical, and the use of the Spatial Plan for this purpose is supported by the Submitter.
- 11 In order for Greater Christchurch to provide for a well-functioning urban environment under Policy 1 of the NPS-UD, Greater Christchurch needs to have or enable a variety of homes that, relevantly:
 - (a) meet the needs, in terms of type, price, and location, of different households;
 - (b) enable Maori to express their cultural traditions and norms;
 - (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - (d) support, and limit, as much as possible adverse impacts on, the competitive operation of land and development markets; and

- (e) support reductions in greenhouse gas emissions; and
 - (f) are resilient to the likely current and future effects of climate change.
- 12 Intensification alone cannot meet the requirements of the NPS-UD, and the provision of greenfield development is required to satisfy Direction 4.4 to provide housing choice and affordability, along with providing thriving neighbourhoods with quality developments supporting community infrastructure as required by Direction 4.4. Adopting a key focus on intensification and existing FUDA's fails to take a forward-looking approach to providing for growth in Greater Christchurch and does not give effect to the NPS-UD.
 - 13 The GCSP explains that *"the broad locations for residential growth are shown in Map 14 under Opportunity 5. The Priority Development Areas will also be a significant tool to incentivise redevelopment and higher density housing (see the collective focus on unlocking the potential of Priority Areas section). Further to this, locations for development to provide additional capacity should align with the direction in the Spatial Plan and desired pattern of growth."*⁴
 - 14 Whilst the GCSP accepts that the greenfield areas will continue to be part of how the population can be accommodated whilst providing a range of lifestyle choices it does not identify where new greenfield areas should locate and therefore fall outside the desired pattern of growth identified by the GCSP.
 - 15 This will result in other relevant strategic planning documents such as the Canterbury Regional Policy Statement and district planning documents being constrained in where FUDA's can be provided across Greater Christchurch.
 - 16 The GCSP also fails to identify significance criteria for greenfield development, while providing some commentary on what this could be. The GCSP states that successful greenfield development will need to⁵:
 - (a) be well connected with employment, services and leisure through public and active transport networks;
 - (b) be integrated with existing urban areas;
 - (c) meet a need identified by the latest Housing and Business Development Capacity Assessment; and
 - (d) be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.
 - 17 It is submitted:
 - (a) it is unacceptable and inappropriate to require greenfield development to be demonstrated against the latest Housing and Business Development Capacity Assessment, as this would be at the control of Council and not appropriately provide for private developer lead plan changes pursuant to Policy 8 NPS-UD.
 - (b) a requirement for greenfield development to be integrated with existing urban areas is also inappropriate and does not give effect to the NPS-UD. Policy 8 NPS-UD directs local

⁴ Draft Greater Christchurch Spatial Plan at page 69

⁵ Draft Greater Christchurch Spatial Plan at page 72

authorities to be responsive to plan changes providing development capacity that are unanticipated by RMA planning documents or out-of-sequence with planned land release.

- (c) requiring urban development density and scale to protect primary production and highly productive land doesn't reflect the effectiveness or appropriateness of mitigation measures and design. The focus should be on managing effects of the activity.

Prebbleton

- 18 Prebbleton has recently undergone significant development to its town centre which is not recognised and appropriately identified within the Spatial Plan. No identifying Prebbleton as a centre in the Spatial Plan is inconsistent with Prebbleton's identification by Selwyn District Council as an urban environment that had to incorporate the Medium Density Residential Standard within relevant residential zones through Variation 1 to the Proposed Selwyn District Plan. Prebbleton's commercial area has also being proposed to be upgraded from a Local Centre to a Town Centre Zone, to bring it in line with Rolleston and Lincoln. Accordingly, it is submitted that Prebbleton should be identified as a major town or alternatively, a locally important urban centre and town like Lincoln.
- 19 This submitter has made a private plan change request to rezone approximately 37 ha of land from Rural Inner Plains to Living Medium Density Prebbleton Zone in an area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton. Ngāi Tahu NTP Development Holdings Limited (NTP) is partnering with the Submitter to progress the development of this Site. Should the rezoning be successful, NTP will become the future developer of Birchs Village in Prebbleton.
- 20 It would be a logical extension of the Prebbleton township boundary to include this Site, with the waterway and pylons directly to the south and southeast (creating a logical urban edge) and Kakaha Park across the road. The site is 1.8km to the Prebbleton town centre and is located on a priority bus route soon to be upgraded to every 15mins, it has the cycle path directly past it allowing access from Little River to Christchurch CBD and on to the Waimakariri River, with this now becoming a more viable and environmentally friendly option for all ages to travel, with the introduction of E-Scooters and E-Bikes.
- 21 Kakaha Park, a significant investment for the community which is partially constructed and funded, is simply not included in the Spatial Plan at all. Kakaha Park contains sports fields (rugby, football, cricket), a bike track linked to the Rail Trail, dog park and casual recreation (such as diverse play/native planting to explore). As publicly stated by Council staff, Kakaha Park is designed as a unique park which seeks to *"give people a space to make their own fun and enjoy nature"* and *"most importantly though, parks and reserves provide a space for people to enjoy nature, socialise and play – all of which helps people's mental and physical health and wellbeing and strengthens community."*⁶
- 22 It is submitted with respect to Prebbleton:
 - (a) it should be included as a Priority Development Area, including due to its proximity to key employment centres (industrial and commercial on Map 13) and the strategic growth of Prebbleton should be identified as south towards (and covering) the new Kakaha District Park;

⁶ <https://yoursay.selwyn.govt.nz/birchs-rd-park>; and <https://www.stuff.co.nz/the-press/news/mid-canterbury-selwyn/126654755/work-starts-on-new-canterbury-nature-reserve-and-sports-park>

- (b) its urban form should be updated to include all the new and proposed plan change areas and the new Kakaha Park (as open space on Map 10);
 - (c) all lifestyle blocks on the periphery of Prebbleton (already irreversibly fragmented) should be excluded from Highly Productive Land, and Direction 3.4 needs to be amended to ensure it is clear that the Map 12 is not determinative of what land will be determined to be Highly Productive Land by the Regional Council;
 - (d) is notably excluded from areas to Protect and Avoid (Map 5) (c.f. with the identified growth area of Hornby which is covered by an area to Protect and Avoid);
 - (e) Is historically and is still today, a very popular suburb for development. More people are to be enabled to live in areas of urban environment where there is a high demand for housing (i.e. Prebbleton) relative to other areas within the urban environment (Objective 3 NPS-UD); and
 - (f) as an area of high demand, on transport routes (including rail on Map 9), and with a new District Park, there will be significant investment from private property developers including the Submitter⁷, and the ability to achieve significant development capacity.
- 23 Specifically, the Submitter seeks that the area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton and adjacent to Kakaha Park (legally identified as Lot 1 DP 407808; Lot 2 DP 29035, Lot 1 DP 43993, Lot 2 DP 43993; Lot 2 DP 42993, Lot 3 DP 29035; Lot 1 DP 21433, Lot 1 DP 27551, Lot 2 DP 27551, Lot 1 DP 344727, and Lot 2 DP 344727) is included as a FUDA in the Spatial Plan. The relevant documents to support this area for growth can be found here:
<https://extranet.selwyn.govt.nz/sites/consultation/PartA/SitePages/Hearings.aspx?RootFolder=%2Fsites%2Fconsultation%2FPartA%2FShared%20Documents%2F9%2E%20Prebbleton%20Hearing%2FSubmitter%20evidence%2FV1%2D0066%20Birchs%20Village%20Limited&FolderCTID=0x01200016965B9A3519B441A4294380705B7839&View=%7B73CF424E%2DA026%2D458B%2DB015%2D6AF09399D47A%7D>

Other matters

Papanui as a significant urban centre

- 24 The Submitter supports the identification of Papanui as a significant urban centre in the GCSP. It is considered this is an appropriate identification given the key strategic role Papanui has continued to play following the earthquakes, and the significant development that has occurred.
- 25 The identification of the mass transport network is supported and considered appropriate to service this significant urban centre, and it is appropriate the provision is made for residential and commercial development in this area.
- 26 We note that there is a significant portion of land adjacent to the Papanui centre and surround by existing urban areas that is not zoned for urban development. It appears that this includes land owned by the Submitter (legally identified as Part Lot 5 DP 1729, Part Lot 3 DP 1729, Part Lot 4 DP 1729, Part Lot 1 DP 1729, Part RS 308, Lot 2 DP 1729 and Section 4 SO 509157) which has been identified in the Christchurch City Council Plan Change 14 as Future Urban Zone. It seems inconsistent with the identification of Papanui as a significant urban centre that this land (which is part of a larger area of land not part of the existing urban area) located in close proximity to

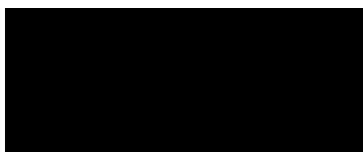
⁷ This is demonstrated by the number of recent private plan changes in the area, and submissions on the Proposed Selwyn District Plan.

Papanui, the mass transport network route and a core public transport route is not identified as appropriate for urban development. Accordingly, the Submitter seeks that this land is identified in the GCSP as a FUDA.

Relief sought

- 27 The Submitter seeks the following decisions:
- (a) that changes are made to the Spatial Plan to ensure it gives effect to the NPS-UD;
 - (b) that changes are made to the Spatial Plan to address matters raised in this submission;
 - (c) that the following sites are included as additional future urban development areas are identified in the GCSP, including the following Sites:
 - (i) Prebbleton - Area south of Hamptons Road, west of Birchs Road and east of Springs Road, Prebbleton adjacent to Kakaha Park (legally identified as Lot 1 DP 407808; Lot 2 DP 29035, Lot 1 DP 43993, Lot 2 DP 43993; Lot 2 DP 42993, Lot 3 DP 29035; Lot 1 DP 21433, Lot 1 DP 27551, Lot 2 DP 27551, Lot 1 DP 344727, and Lot 2 DP 344727)
 - (ii) Papanui - Grassmere Street, Papanui (legally identified as Part Lot 5 DP 1729, Part Lot 3 DP 1729, Part Lot 4 DP 1729, Part Lot 1 DP 1729, Part RS 308, Lot 2 DP 1729 and Section 4 SO 509157); and
 - (d) that Prebbleton is identified as a major town or alternatively, a locally important urban centre and town in the GCSP.
 - (e) Such further or other consequential relief as may be required to give effect to this submission, including consequential amendments that address the matters raised by this submission.
- 28 The Submitter wishes to be heard in support of this submission.

Dated the 23rd day of July 2023



Alex Booker

Counsel for Birchs Village Limited and WDL Enterprises Limited

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 21/07/2023**First name:** Graeme **Last name:** McCarrison**Your role in the organisation and the number of people your organisation represents:**

Spark, Chorus, One NZ, FortySouth and Connexa

Would you like to speak to your submission?☒ Yes☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File

Telco submission Greater Christchurch Spatial Plan 21 July 2023



21 July 2023

Greater Christchurch Council

Email: huihuimai@greaterchristchurch.org.nz.

Draft Greater Christchurch Spatial Plan Submission

1. Spark, Chorus, One NZ (formerly Vodafone), Connexa and FortySouth welcome the opportunity to submit on the Draft Greater Christchurch Spatial Plan.
2. We wish to be heard in support of this submission.

Executive submission

3. We support the draft strategy, the prioritisation of development areas supported by public transport corridors and an improved public transport system.
4. Telecommunications is a critical infrastructure providing digital services essential to a well-functioning urban environment. This is generally well stated in Opportunity 5.3.
5. Recognise the role telecommunications beyond Opportunity 5 related to '*providing space for business and the economy to proposer in a low carbon future*'. Telecommunications is essential in supporting resilience to the impacts of natural hazards and climate change (Opportunity principle 2); providing choices for supporting the movement of people and goods and enabling access to social, cultural and economic opportunities (Opportunity 6). Communications providers have a role in enabling and supporting all 6 Opportunities of the draft Spatial Plan.
6. We look forward to continuing work with Council staff on developing the framework for Council communication, working with infrastructure/network utilities to undertake more detailed infrastructure planning and explore the range of funding options available.

Telecommunications – critical infrastructure

7. Telecommunications providers (refer to Appendix 1) deliver critical communications infrastructure that connects communities, underpins key economic and social objectives and is a critical part of our response to climate change. Communications providers invest over \$1.5 billion every year to maintain existing services, add capacity and resiliency to existing networks and connect new communities. Some of the investment relates to the cost of relocating existing cell-sites because of the increasing densification of urban areas.
8. In parallel, Spark, and One NZ are currently rolling out new 5G mobile networks, deploying over 1,000 new mobile sites and extending network coverage to regional communities. Connexa and FortySouth are essential partners in building the mobile network infrastructure. Chorus as a wholesale only provider of broadband services over fibre optic and copper networks. In late 2022 Chorus completed the final stage of the Ultrafast Broadband network build with fibre services now available to 87% of New Zealand addresses. Demand for fibre services continues to grow and Chorus recently connected their one millionth address to fibre. Chorus continues to expand its fibre network in urban and small rural settlements. Continuous network technology upgrades are needed to keep up with the increasing demand from consumers and businesses – exponential growth in the use of data is continuing and each year the amount of data handled by telecommunications networks roughly doubles. Chorus, Spark, One NZ, FortySouth and Connexa, along with other telecommunication providers, invest significantly every year in our networks to ensure New Zealanders have access to world class digital services.
9. The mobile, wireless and fixed line/fibre services that Spark, Chorus, One NZ, Connexa and FortySouth provide are a key part of our national infrastructure. Mobile communications have developed into an essential and critical function, supporting New Zealanders in all aspects of their lives. It is worth explaining a couple recent changes to the how we build and provide network due to Spark, One NZ and 2degrees selling most of their passive network to Connexa (Spark & 2degrees) and FortySouth (One NZ) are responsible for, building, owning, operating, and maintaining the mobile tower infrastructure which Spark, 2degrees

and One NZ attach their network equipment. Spark, 2degrees and One NZ remain telecommunication network operators providing customers the opportunity for digital connectivity. The diagrams in Appendix 2 give a general understanding of what each organisation is responsible for and highlight the split between passive structures and the active components of the Spark, 2degrees and One NZ wireless networks.

10. The influence of the telecommunications sector and its infrastructure is significant across the four dimensions of wellbeing: Economic, Social, Cultural, and Environmental. Mobil, wireless and fixed line/fibre infrastructure is critically important for the economy and peoples' wellbeing. Our services also allow consumers to contact friends and family, conduct business, be entertained, and engage with Government, medical, educational, and emergency services. Similarly, our sector will be a critical driver of productivity growth across the New Zealand economy in the near and long-term.

Telecommunication important to Greater Christchurch

11. We would like to take the opportunity to highlight the importance of telecommunications to Greater Christchurch.
12. Telecommunications infrastructure is nationally, regionally, and locally critical. It is fundamental to digital transformation of private and public (both social and network) infrastructure. Telecommunication networks, wireless and fixed line are a critical part of enabling New Zealand to successfully respond to climate change, monitor and enhance the environments that New Zealander's love. These networks enable the gathering and generation of data to better understand and respond to changes, especially environmental changes which are occurring at pace. Telecommunication network technology is continually developing and changing to meet customer expectations for new, faster, and uninterrupted digital experiences wherever possible they are. The continual challenge is finding locations to increase the density of the telecommunication networks to meet the demand generated by growth and development.

13. Well-functioning communities depend on recognising and planning for the all the core infrastructure including telecommunications, social infrastructure, three waters, transport/movement, and electricity. There are interdependencies between networks especially on electricity. Urban systems are interdependent for example a poorly community with poor connectivity generates car dependency, which leads to air pollution, high carbon emissions, obesity and other health issues, degradations of local amenity, anti-social behaviour and loss of natural habitat.
14. Telecommunications and digital infrastructure are important for ensuring access for everyone including those who are vulnerable and disadvantaged. Ensuring that telecommunications networks are recognised, planned for, and constructed is critical part of planning for growth and development in the Greater Christchurch as telecommunications:
 - a. shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
 - b. link people, enabling the flow of ideas and information.
 - c. connect whanau, communities, business, enables new technologies and is becoming increasingly essential for accessing key services such as education, social, health, business, and government services.
 - d. significantly contribute across the four dimensions of wellbeing: economic, social, cultural, and environmental.

Well-functioning urban environments

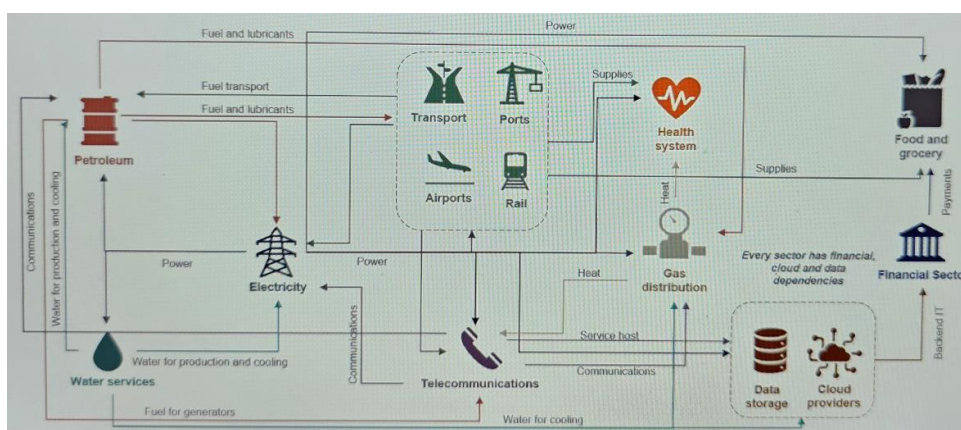
15. Telecommunication and infrastructure including electricity is missing from the explanation of what contributes to a well-functioning urban environment. Core to any well-functioning urban environment is the infrastructure such as telecommunications and electricity on which the people and economy of Greater Christchurch dependent. Take away telecommunications and electricity the modern urban environment will not function.

16. **We recommend** that the following be added to the meaning of a well-functioning urban environment.

Enable and support the provision of critical infrastructure, such telecommunications.

Resilience of Communities

17. Opportunity 2 fails to recognise the impact that disruption to telecommunications could have during an extreme natural hazard event, such as Cyclone Gabrielle. The 'Strengthening the resilience of Aotearoa New Zealand's critical infrastructure'¹ system discussion document outlines why a resilient critical infrastructure system matters for our country and people. The following diagram presented during a Critical Infrastructure webinar on 20 July 2023 by Te Waihanga and Department of the Prime Minister and Cabinet (DPMC) shows the interdependencies between critical infrastructure and impacts of outages in one sector can have flow on consequences for other sectors. Telecommunications and electricity are critical sectors our communities and the economy.



¹ https://consultation.dPMC.govt.nz/national-security-group/critical-infrastructure-phase-1-public-consultation/user_uploads/discussion-document--strengthening-the-resilience-of-nzs-ci-system.pdf

18. **We recommend** that Opportunity 2 recognises that interdependencies between infrastructure sector especially telecommunications and electricity. It is essential that the existing and proposed growth areas have telecommunications infrastructure both wireless and fixed line integrated into the developments. Currently it does not happen under the existing regulatory regimes of the District Plans.

Climate Change Challenge – role of digital technology

19. Opportunity 6 of the draft strategy explores the opportunities for reducing greenhouse gas emissions via measures to change the way people travel. Ensuring access to quality connectivity will be key to reducing emissions. The telecommunications network and digital technology is a critical pathway to reducing greenhouse gas emissions in many ways:
- a. Avoiding transport emissions by enabling more people to work and study from home. This goes beyond connecting people virtually, to enabling secure remote access to systems and services, and monitoring physical assets. A consequential life cycle assessment was undertaken in 2022 to measure how working from home one day a week affects the size of an employee's carbon footprint. One NZ commissioned Thinkstep-anz carry out a Consequential Life Cycle Assessment (CLCA)² which found that the average New Zealand office worker who works one day a week from home will save 4.2kg in carbon emissions per day, compared to commuting into the office every day.
 - b. Using smart technology to reduce energy consumption for individual households and public institutions such as schools and hospitals. This includes smart thermostats, heat pumps, and water heaters, and demand management technologies to support grid decarbonisation and reduce peak demand by controlling and coordinating energy heavy activities such as EV charging.

² [What does working from home do to your carbon footprint? \(one.nz\)](https://www.one.nz/what-does-working-from-home-do-to-your-carbon-footprint/)

- c. Using smart cities technology to help tackle climate change. For example, for traffic management, optimising refuse collection, monitoring pollution, optimising street lighting, ride sharing, energy metering, and switching on devices at times to optimise energy use.
20. The smart technologies we mention rely on sensors and telecommunications networks to record and relay data. Research from Spark and Thinkstep-ANZ³ found that digital technology as an enabler of a variety of actions could collectively reduce annual emissions 7.2 Mt by 2030 - the equivalent of 42 percent of Aotearoa New Zealand's current emissions budget targets.
21. **We recommend** that Opportunity 6 recognises internet access and digital enablement more generally be included as part of climate change mitigation part of the Spatial strategy.

If there are any questions, please contact Graeme McCarrison.

Ngā mihi

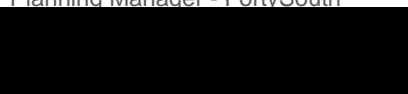
Graeme McCarrison

Planning and Engagement Manager - Spark



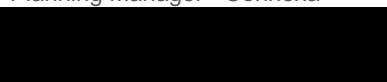
Colin Clune

Planning Manager - FortvSouth



Fiona Matthews

Planning Manager - Connexa



Andrew Kantor

Planning & Engagement Manager - Chorus



³ [Meeting The Climate Challenge Through Digital Technology \(sparknz.co.nz\)](https://sparknz.co.nz)

Appendix 1 – Telecommunication Providers

Telecommunications infrastructure is critical and essential to a modern economy and connecting the 'system of systems' that supports New Zealand's economy and wellbeing of people and communities.

The Infrastructure Commission's discussion document on Infrastructure for a Better Future recognises the critical nature of telecommunications infrastructure. The report notes that 'Increasing reliance on communications makes telecommunications infrastructure more critical.'

Telecommunications plays a vital and important role in national resilience, demonstrated most recently through our national response to Covid-19, as recognised by the Infrastructure Commission: 'The Covid-19 pandemic is a reminder of the importance of a resilient, flexible and agile infrastructure system, as demonstrated, for instance, in the move to working from home, where telecommunications infrastructure has become a substitute for physical transport infrastructure.'

New Zealand has multiple layers of networks (wireless, IoT and fixed line, plus satellite) and providers include:

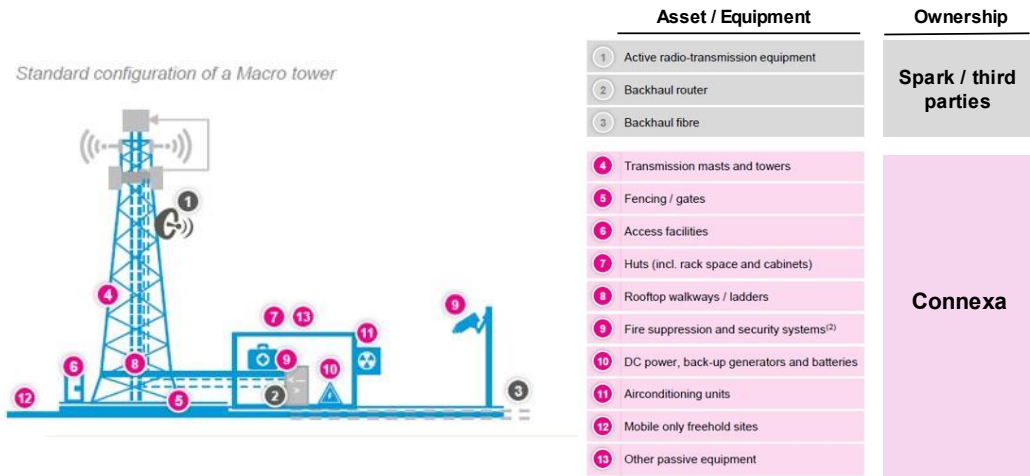
- Wireless networks of Spark, One NZ, 2 degrees and Rural Connectivity Group (RCG) (a joint venture between Spark, One NZ and 2 degrees)
- Fixed line networks operated by Chorus nationally, Tuatahi First Fibre (previously Ultrafast Fibre Limited) throughout Waikato, Bay of Plenty, Manawatū-Whanganui, Taranaki and Enable in parts of Canterbury including Waimakariri. Note that Spark and One NZ have large fibre networks of their own.
- Connexa and FortySouth manage, and build passive infrastructure for network operators such as Spark, One NZ and 2degrees.
- Wireless Internet Service Providers (WISPs) – there are about 30 WISPs operating across Aotearoa – including Amuri Networks in Canterbury
- International companies e.g. Starlink (SpaceX service), Amazon, Google

Our wireless telecommunications networks enable the provision of Emergency Mobile Alerts by the National Emergency Management Agency. These are messages about emergencies sent by authorised emergency agencies to capable mobile phones. The alerts are designed to keep people safe and are broadcast to all capable phones from cell towers within the emergency area.

Telecommunications infrastructure is a key enabler of future technologies that are expected to be one of the solutions to many of today's challenges, from climate change to lifting our productivity and innovation. The Climate Change Commission's final advice to the government for its emissions reduction plan notes precision agriculture as an example of the ways in which technology will help to improve efficiency and reduce environmental impacts in agriculture – it requires digital connectivity and networks to be possible. The rollout of 5G and digital technology that it enables is critical to a well-functioning urban environment as it is widely expected to transform our cities and the ways in which we use other types of infrastructure.

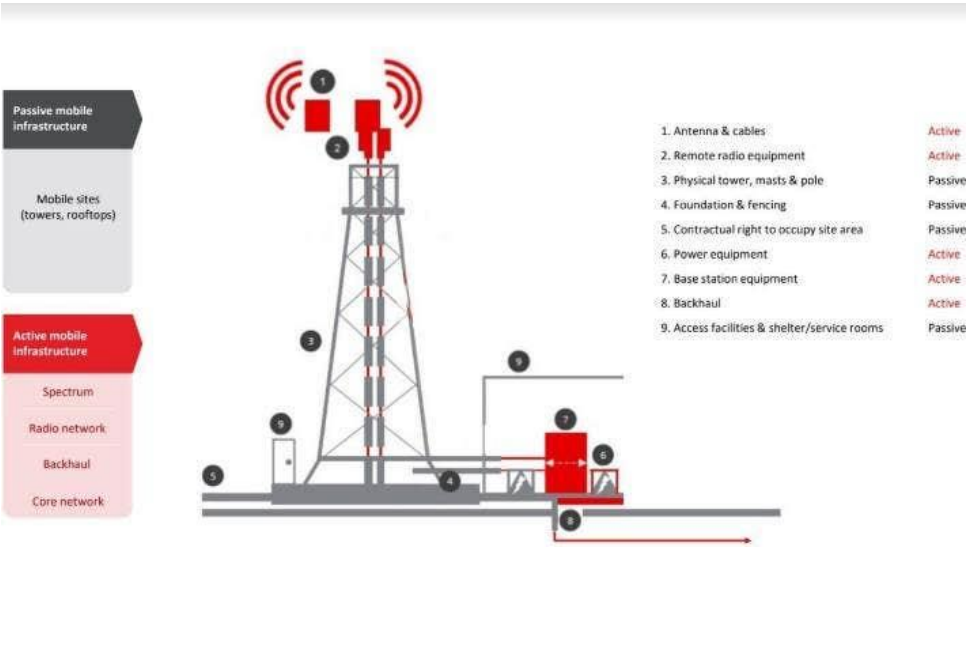
Appendix 2 Connexa & FortySouth

Spark / Connexa asset split on a typical macro tower



1

FortySouth



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Hannah **Last name:** Marks

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Orion Group Limited

Your role in the organisation and the number of people your organisation represents:

GM Energy Futures

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
ORION GROUP FINAL Submission - Greater Chch Spatial Plan



22 July 2023

Greater Christchurch Spatial Plan Consultation
 Greater Christchurch Partnership
 PO Box 73014
 Christchurch 8154

By email: huihuimai@greaterchristchurch.org.nz

Dear Whakawhanake Kāinga Komiti

Greater Christchurch Spatial Plan

1. Thank you for this opportunity to make a submission on the draft Greater Christchurch Spatial Plan (Spatial Plan).

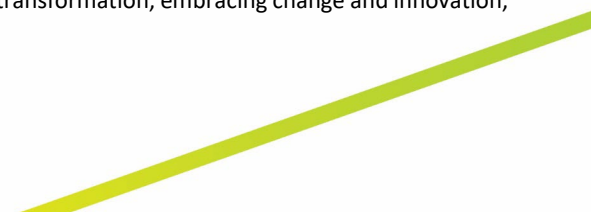
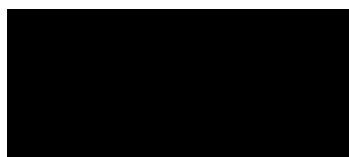
Background

2. As you will be aware, we own and operate the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur's Pass. We deliver electricity to more than 220,000 homes and businesses and are New Zealand's third largest Electricity Distribution Business (EDB). Orion and its various predecessors have been providing this essential service to the region for close to 120 years.

3. Orion is a Lifeline Utility for the purposes of the Civil Defence Emergency Management Act 2002. Orion has a statutory duty under this legislation to ensure it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.

4. Orion has a fully owned subsidiary, industry service provider Connetics, and together with Orion the two organisations make up the Orion Group.

5. Central Canterbury is a place of rapid growth and transformation, embracing change and innovation,



with Ōtautahi Christchurch at the heart of this diverse and vibrant region. Electricity distribution has always been an essential service that underpins regional, community and economic wellbeing. Our service is vital to the wellbeing and livelihood of the people and businesses who live and operate here. Now, it also has a critical part to play in New Zealand's transition to a low carbon economy.

6. In this context Orion's Group Purpose of "Powering a cleaner and brighter future with our community" is central to all we do. As Aotearoa New Zealand transitions to a low carbon economy, the energy sector has a critical part to play primarily through electrification. Orion has established its purpose to be a vital player in that transition for our community and our region. We are focused on helping our community realise its dreams for a future that is new, better, and more sustainable over the long term.¹

7. We are very conscious that we face a rapidly changing and massively different energy environment in the decades ahead. The changing landscape facing Orion is primarily driven by three factors – climate change, new technology and increasing demand for electricity. The increasing demand for electricity is driven by the need to both enable decarbonisation at pace, and support population growth.

8. As the draft Spatial Plan points out, the latest projections from Stats NZ indicate Greater Christchurch's population will grow from a population of approximately 530,000 to more than 700,000 by 2051. This is around 170,000 more people and 77,000 more households. Although this population growth could occur sooner if Greater Christchurch grows at the rate seen over the last 15 years. It could reach a population of 700,000 within the next 25 to 30 years and one million within the next 60 years, doubling the size of today's population.

9. This Spatial Plan will satisfy the requirements of a future development strategy under the National Policy Statement on Urban Development (NPS UD). Importantly, the NPS UD directs that local authority decisions on urban development are to be integrated with **infrastructure planning decisions**, and that planning decisions contribute to well-functioning urban environments.² A well-functioning urban

¹ A recent report by the Boston Consulting Group highlights the role the electricity industry can play in reducing New Zealand's carbon emissions. The increase in electrification of transport and heating will allow New Zealand to make considerable movement towards the decarbonisation goals that have been set. In order to support this, New Zealand will need electricity networks to be expanded, more distributed and able to meet the changing needs of consumers. In essence, distribution will need to be widespread, flexible and reliable. See Boston Consulting Group Report: *The Future is Electric A Decarbonisation Roadmap for New Zealand's Electricity Sector 2022*, page 200.

² Policy 1.

environment is one in which:

- Infrastructure is not adversely affected by incompatible activities; and
- Urban growth is planned with infrastructure provisions in mind, recognising that the two run hand-in-hand.

10. We note that *Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy 2022 – 2052* emphasises the need to plan for infrastructure networks for our cities before they are required. Otherwise, it may be difficult, if not impossible, to provide them later. The Strategy also emphasises the preparation for future infrastructure should look at all the types of infrastructure and transport that will be needed.³

11. In this context, we strongly support integrated energy planning in developing this Spatial Plan. We explain this further in our submission when we talk more about the potential changes that will be needed to our infrastructure in order to progress the outcomes in this Spatial Plan. We will need as much foresight and prior knowledge as possible of significant changes to urban development and transport planning to provide successfully for the accompanying energy infrastructure.

12. We now set out our comments on the various questions raised in the online submission form.

Summary

13. Orion supports the intent of the draft Spatial Plan, a collaborative vision for how the Greater Christchurch area will grow and develop in the long term will assist Orion to plan effectively and efficiently. That said, how the Spatial Plan is executed and carried forward into the relevant planning documents will be vitally important to achieving that outcome.

³ See *Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy 2022 – 2052*, para 6.3.3, p78. It should consider

- The potential for rapid transit networks in existing and future urban areas, even if they may not be needed in the near future.
- How land can be adapted if needs change. For example, land that's protected for a long-term rapid transit corridor could either be used for a busway or rail line, or converted to other uses.
- Designing street networks so they provide for current and future needs. For instance, street grids that distribute traffic across many routes may be better in the long-term than street layouts that feed all traffic into a small number of major roads

14. For Orion to be able to continue to provide a reliable and resilient supply of electricity to the intensified, and increasingly electrified, city it will need to be able to plan in advance for increasing demand and to have space for the required infrastructure. For this to occur Orion wishes to highlight the following.

Public Transport

15. Orion's ability to respond to changes in demand that result from changes to transportation (whether that is an increase in the use of private electric vehicles or the development of a Mass Rapid Transit (MRT) system that relies on electricity, or both) will be enabled by advance knowledge so Orion can make provision of infrastructure to support that increase in demand. The implementation of the public transport components of the Spatial Plan needs to enable that provision.
16. The Spatial Plan shows an indicative location for a MRT system. Existing Orion infrastructure will need to be considered in the planning of such a system. Relocation of some electricity infrastructure can require a large lead in time and Orion will need to plan for this in advance to avoid delays.

Urban centres and transport corridors

17. Where intensification occurs it can be difficult for Orion to find appropriate locations for the additional infrastructure that is inevitably required to meet the increase in demand. Infrastructure must be located close to the demand and as such Orion have sought amended provisions through Plan Change 14 to the Christchurch District Plan (PC14) and through Variation 1 to the proposed Selwyn District Plan (Variation 1) that require developers of intensified sites to discuss provision of space with Orion as part of the resource consenting of a development. The need to allow for additional infrastructure will continue to be important and should be central in the implementation of the Spatial Plan.
18. Intensification will also result in reduced setbacks from the front of properties and increased height limits; the resulting potential for conflict between electricity lines and built form needs to be addressed when the Spatial Plan is implemented. Orion have sought amendments through PC 14 and Variation 1 to this effect and reiterate here that this will continue to be an issue that should be considered in all areas where intensification occurs.

Natural Environment

19. Orion is supportive of the Spatial Plan's intentions in relation to the natural environment. Orion plays an

active part in maintaining and enhancing the natural environment through significant targeted planting programs. That said, there is a significant risk to Orion's infrastructure, and associated critical service to our community, as a result of negative interactions with vegetation. That risk must be considered when the Spatial Plan is implemented. Where any planting is proposed a collaborative approach needs to be taken to ensure that the planting is located appropriately and that species selection allows for the vegetation to thrive without interference with electricity infrastructure.

Blue-Green Network (Green Belt)

20. The introduction of a Greenbelt to separate urban and rural areas is a concept that Orion supports however, as with all areas of the Spatial Plan, it will be crucial that in the implementation of this concept the importance of installing, maintaining and protecting critical infrastructure is considered. If a Greenbelt was created, Orion would welcome the opportunity to assist in ensuring it is compatible with the continuation and installation of Orion's infrastructure; there may well need to be infrastructure links across blue-green areas to interconnect electricity supply depending on existing services and the layout of our network. Blue-green areas will also need to provide clearance corridors so that vegetation around our distribution network can be better managed.

Priority development areas

21. Orion supports the recognition of priority development areas but reiterates the need to proactively provide for additional infrastructure growth and ensure that existing and new infrastructure is not negatively impacted by intensification through planning provisions. It will also be important when planning for accelerated development and intensification to ensure that coordination with the timing of infrastructure upgrades occurs.

Spatial Strategy

22. Orion has suggested a number of amendments to the draft Opportunities set out in the strategy. The amendments sought are in order to strengthen the ability for Orion to provide a reliable and resilient supply of electricity through the time the Spatial Plan relates to.

Public transport

23. The draft Spatial Plan concentrates growth around urban centres and along public transport

corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

24. Orion supports, in principle, the improved public transport system proposed in the draft Spatial Plan, including the proposed mass rapid transit system. There are two main areas where the execution of the proposed Spatial Plan will need to integrate with Orion's forward planning in order to avoid delay or unnecessary expense and Orion wishes to flag these areas now to ensure the Komiti is aware of the importance of a collaborative approach. The areas of specific interest are the implications of the MRT and broader public transport plans on use overall transport patterns, and hence future electricity demand and charging needs across the sub-region; where the MRT system requires power (and therefore additional infrastructure) in order to operate; and where existing Orion infrastructure is located within MRT corridors and needs to be relocated.

25. We explain further below the modelling work that we are doing to understand future electricity demand and we provide some comments about the practical implications for Orion of the proposed MRT system.

Modelling for future transport electricity demand

26. We expect growing demand for electricity for transport as fossil fuels are phased out of both private and public transport. Changes to network infrastructure will be required to support the growing electrification of transport. The overall demand for transport and mode of transport has a significant impact on how Orion plans for these investments.

27. Changes to our network infrastructure are significant investments and can have long lag times. This means as much foresight and prior knowledge as possible of significant changes to urban development and transport planning is critical. We welcome the opportunity to contribute to this consultation.

28. Orion is currently establishing its Future Energy Scenarios for the Mid Canterbury region. These Future Energy Scenarios are plausible development pathways for energy sector transition in our region over the next 30 years. By planning for different scenarios in 2050 we are able to understand the different potential needs and uses for our network in energy transition.

29. The Future Energy Scenarios will play an important role in local area energy planning. By understanding the changes in demand and generation of energy in our region, we can help to develop a

more collaborative understanding and planning environment for our region's long term energy needs.

30. Understanding the development of transport is critical to developing our Future Energy Scenarios. We are attempting to model different development pathways for demand and mode for transport and we welcome engagement and input from the Komiti on this work.

31. The primary considerations we are attempting to understand for the purposes of electricity network investment are:

a. When electricity will be required; this includes planning for infrastructure to support increasing load over years as transport is electrified, and sizing the network correctly to support the peak demand during the day;

b. Where electricity will be required determines what network infrastructure services the demand. There will be differences in where demand is highest on the network depending on whether people charge private electric vehicles at home, at work, or at charging stations, and where public transport is used and how it uses electricity (depot battery charging or en-route electricity supply).

c. Capacity required to service demand will also depend on the size of the load at any one time. A lot of relatively small private vehicles charging at disaggregated times has a very different network requirement to service than several rapid chargers charging concurrently to service large vehicles like buses.

32. We also need to consider practical implications such as acquiring land to build infrastructure to support transport demand, cross over between existing infrastructure and construction requirements for mass rapid transit routes, and the type of new connections that could be required by proposed mass rapid transit options including housing intensification or infill housing along such routes.

Mass Rapid Transit (MTR)

33. The proposed MRT system is likely to significantly change how demand for electricity in transport develops. By encouraging uptake of public transport, it will essentially concentrate demand from many potential private electric vehicles to larger point loads that service the MRT corridor. It will also likely reduce total demand for transport as more people live closer to where they work in higher density.

34. It is difficult to immediately assess the impact of this on the Orion network. Overall MRT is likely to be more efficient and lower overall energy demand compared to the counterfactual where it isn't developed. It could reduce the need for investment on the low voltage network to support in home charging of private vehicles in some areas.

35. However, demand for electricity from the MRT could be less flexible, depending on the mode developed, requiring electricity when there is demand for transport, rather than private electric vehicles which have some flexibility in when they need to be charged. Depending on when MRT development occurs it could bring demand for electricity forward, if it is built ahead of mass private vehicle electrification, requiring earlier investment on the network. This will also require more complex and larger connections to the network.

Practical Implications for Orion

Planning Implications

36. Orion's ability to respond to changes in demand will depend on our ability to be flexible in the provision of infrastructure. In this sense it is important that the planning provisions that flow from the Spatial Plan allow for Orion to obtain additional space for infrastructure when and where it is required. Planning provisions will also need to recognise the importance of protecting Orion infrastructure in a changing environment that is likely to result in a more intense built form with a higher risk of negative interaction between built form and infrastructure.

37. Orion has submitted on Plan Change 14 to the Christchurch District Plan (PC14) and Variation 1 to the proposed Selwyn District plan (Variation 1) seeking the inclusion of provisions that allow for additional land to be set aside where intensification of a site occurs and the increase in demand means additional infrastructure is required. Enabling the upgrade of infrastructure in line with development that increases demand will be key to ensuring Orion is able to respond to that demand.

38. The ability for Orion to enable the MRT and broader electrification of our transport system, will require similar proactive, least regrets planning, investment and flexibility. As set out above, whether the demand is to enable the charging of individual electric vehicles at home, or some form of MRT, it will require consideration as early as possible to allow Orion to support it. Provision in the planning framework to facilitate a range of scenarios will be required in order to ensure provision of electricity to meet the need.

Interface between proposed MRT and existing Orion Infrastructure

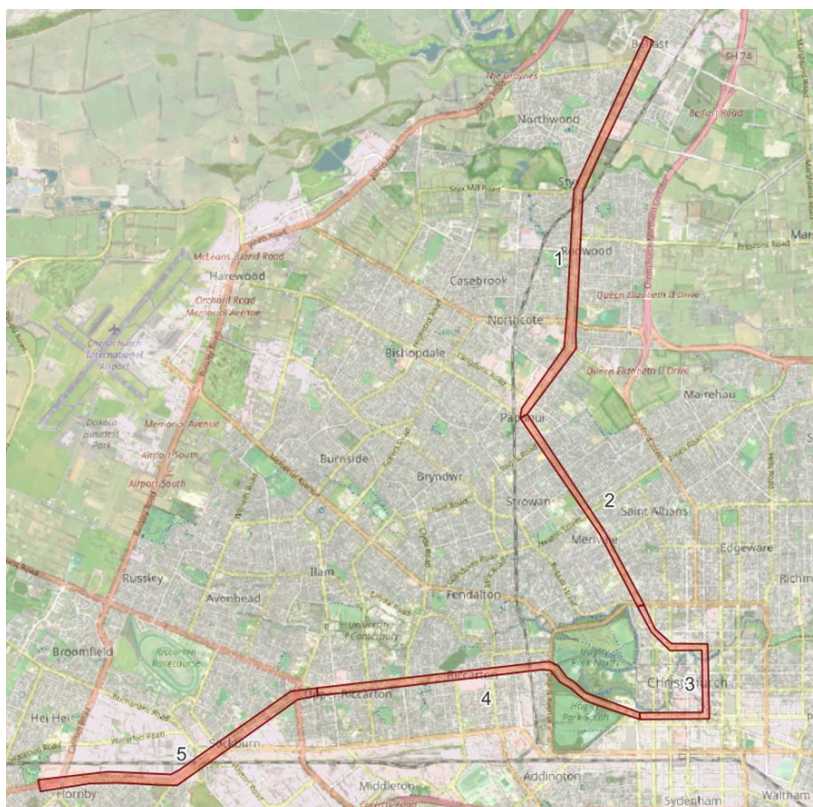
39. In addition to the provision of additional infrastructure to meet the likely increase in demand for electricity, there is potential for a MRT system to be located across, or in close proximity to, areas where Orion has significant infrastructure already in place. In some cases, the introduction of an MRT system will require the movement of the electricity infrastructure, as colocation would not be practical or feasible. This is likely to be a concern in any location that is suitable for MRT and Orion wishes to highlight the importance of communication and timing to enable investment in changes to Orion infrastructure where that is required.

40. An example of where colocation of Orion infrastructure and MRT would not be compatible is where high voltage cables run underground, either where an MRT route is proposed or in close proximity to the route. If movement of infrastructure is required, Orion will require as much time as possible to allow for planning and the physical relocation. Prior to the physical works commencing there is significant planning required, including design, resource consenting and procurement; these processes can take years to complete.

41. As an example of the time required for some projects, Orion is currently undertaking a 15 year project to upgrade the high voltage underground network within Christchurch City. Attached and marked "A" are images showing the works currently underway to install high voltage cable underground in the section between the Milton and Bromley zone substations on Ferry Road and setting out timeframes for the physical works. In this example the cable was ordered approximately 18 months prior to being available for use. Planning and design for the works commenced approximately 5 years before physical works commenced.

Orion Infrastructure located along the proposed MRT routes

42. The map below shows the approximate MRT Routes.



43. Orion has used the map above to calculate the following approximate list of assets that sit within or immediately adjacent to the MRT route such that they might be affected by the route:

1. 131x Sites:
 - i. 88 Kiosk Substation Sites
 - ii. 15 Outdoor Substation Sites
 - iii. 12 Building Substation Sites
 - iv. 6 Primary Network Centre Sites

- v. 6 Undeveloped Sites
 - vi. 2 Zone Substation Sites
 - vii. 2 Pad Mount Transformer Sites
- 2. 151 poles
 - 3. 863 Distribution boxes
 - 4. 338 Distribution cabinets
 - 5. 2,900m of overhead lines
 - 6. 2,438m of 33kV/66kV underground cable
 - 7. 160,970 of underground cable (11kV, low voltage, out of service or street light)

44. The extent of infrastructure that will need to be relocated will depend on the specific location of the MRT within the corridor and the nature of the MRT system, however Orion wish to reiterate that these works will take some time and communication will be central to ensuring there are not delays.

Urban centres and transport corridors

45. According to the draft, concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

46. In principle Orion supportsthe focus of future development and investment around urban centres and transport corridors. In order to ensure that intensification in these (or any) areas is successful and that there is a reliable and resilient supply of electricity, there must be consideration given to how and where the upgrading of infrastructure that will inevitably be necessary is to occur.

47. As with transport, housing development has significant impacts on our investment in network infrastructure. Orion is attempting to model these potential changes, including the potential energy system impact of housing intensification and typology; building energy efficiency; industrial development and decarbonisation; and transport plans, as part of our Future Energy Scenarios, in order to understand how

different outcomes can change energy demand and so enabling investment in the electricity network. We welcome the opportunity to engage with the Komiti on the Spatial Plan and would welcome the opportunity to engage on the development of our Future Energy Scenarios.

48. The Mass Rapid Transit corridors and intensification in surrounding areas and urban centres will have a significant impact on requirements for network investment. New houses need to be connected to the network and serviced from existing infrastructure. High density infill housing can have high impacts where individual properties with a single connection suddenly become multiple units servicing many households. The speed of change, particularly for infill housing, can have impacts where there are lags for building infrastructure. Space for new 11kV/415V transformer kiosks is required in conjunction with high density infill housing.

Practical Implications for Orion

49. As traversed in the section above, Orion has submitted on PC14 and Variation 1 that are currently being consulted on. The Orion submissions seek amendments to the provisions as notified to ensure that where there is intensification of lower density areas, the provision of additional infrastructure is not only possible but actively enabled.

50. The Orion submissions on PC14 and Variation 1 have also sought that where the density of built form is likely to be higher (in medium and high density zones) there are setbacks from all electricity infrastructure to ensure that where the built form is closer to the boundaries of properties and greater in height the likelihood of negative interactions is reduced.

51. Without the amendments sought by Orion, the ability to react and ensure reliable supply of electricity will be difficult. The infrastructure most commonly required to meet such increases in supply is fixed in size and needs to be located in close proximity to the demand.

Natural Environment

52. The draft Spatial Plan notes that the natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

53. Orion **supports** the proposed approach to maintain and enhance the natural environment within our urban areas. We very much agree that a healthy natural environment is intrinsically linked with the wellbeing of people and places. Blue-green networks provide a number of benefits including improving the overall quality of both urban and rural environments and mitigating the impacts of climate change and providing adaptation benefits. This is in keeping with our purpose of “Powering a cleaner and brighter future with our community”, and our focus area of being a Force for Good in the Communities we Serve

54. By way of example, Orion’s native forest carbon offsetting programme has now been launched thanks to two historic partnerships with local landowners committed to bringing new life to their land in Banks Peninsula.

55. On the whenua in Purau Bay we planted 21,000 kanuka seedlings in the 2022/2023 financial year. With additional planting of various other native species in subsequent years, this forest will sequester an average 95 tonnes of carbon dioxide per year over the next 50 years. It is also a win for biodiversity which is important for healthy ecosystems as well as protecting a major waterway into Whakaraupō (Lyttelton harbour).

56. In February 2023, Wairewa Rūnanga and Orion Group signed an agreement to recloak up to 280 hectares of Te Kaio farm, a 280-hectare block of ex-farmland near Wairewa, Little River, belonging to the Rūnanga. Orion is bringing forestry expertise, capital, and personnel to the project, with Te Kete o Wairewa, the legal entity of the Rūnanga, supplying the land and a mātauranga Māori lens.

Practical Implications for Orion

57. The draft Plan refers to supporting the development of local area plans, urban greening strategies and forest plans, new guidelines and regulations that support urban greening and increased tree cover as well as exemplar or demonstration projects. This is a sound approach but these plans and strategies will need to take into account the requirements of infrastructure in and around these areas. For example, there may well need to be infrastructure links across blue-green areas to interconnect electricity supply depending on existing services and the layout of our network. Blue-green areas will also need to provide clearance corridors so that vegetation around our distribution network can be better managed.

58. Orion has identified that trees and vegetation constitute a medium to high risk to Orion’s infrastructure. Recent weather events in the North Island have unfortunately demonstrated this, with a

significant percentage of the power outages occurring as a result of trees and vegetation on power lines.

59. As detailed in our Asset Management Plan for 2023-2024⁴

Orion's network has 6,000km of overhead lines that are more susceptible to the risks posed by vegetation growth. Many of these lines run parallel to property fence lines and in rural areas, they are often lined with hedges and trees for shelter belts. These hedges and trees, along with other vegetation encroaching on the power network pose significant risks to our overhead line assets and our service providers and the public who are near them. Without regular vegetation maintenance trees and hedges begin to encroach on the overhead network and can cause power outages, damage, injury and fires.

In some cases, outages caused by tree colliding with our lines can cause lengthy outages, with widespread impact on communities.

60. Our Climate Change Opportunities and Risks report⁵ indicates the growth rates for vegetation are likely to increase due to warmer and wetter conditions because of climate change. The report also indicates our biggest physical risk from climate change is likely to be from vegetation on our overhead lines causing power outages, severe storms, and drier conditions increasing the risk of fire.

61. Consequently, we want to emphasise that in "greening" the blue-green areas, a collaborative approach with infrastructure providers will be key when it involves planning and planting. Plans will need to allow for the realities of how a distribution network operates. Ensuring planting is undertaken in appropriate locations, and ensuring appropriate species are selected where planting is in the vicinity of infrastructure providers will be critical to the success of the blue-green network.

⁴ See <https://www.oriongroup.co.nz/assets/Company/Corporate-publications/Orion-AMP-March-2023.pdf>

⁵ See <https://www.oriongroup.co.nz/assets/Company/Corporate-publications/2020-Orion-Climate-Change-Report.pdf>

62. Trees interfering with power lines and tree roots interfering with underground cables can (and frequently does) result in damage to the network and ultimately in the removal of the tree. Orion already spends considerable time and expenditure⁶ in addressing such damage and is eager to ensure that future planting is not undertaken in a way that results in further damage to infrastructure and the need to remove vegetation.

Blue-Green Network (Green Belt)

63. As the documentation notes, one aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a green belt. This potentially has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

64. Orion supports in principle the concept of a green belt around our urban areas and further investigation of this concept subject to our comments below.

65. At Orion, for planning purposes, our network is divided into two regions rather than urban and rural:

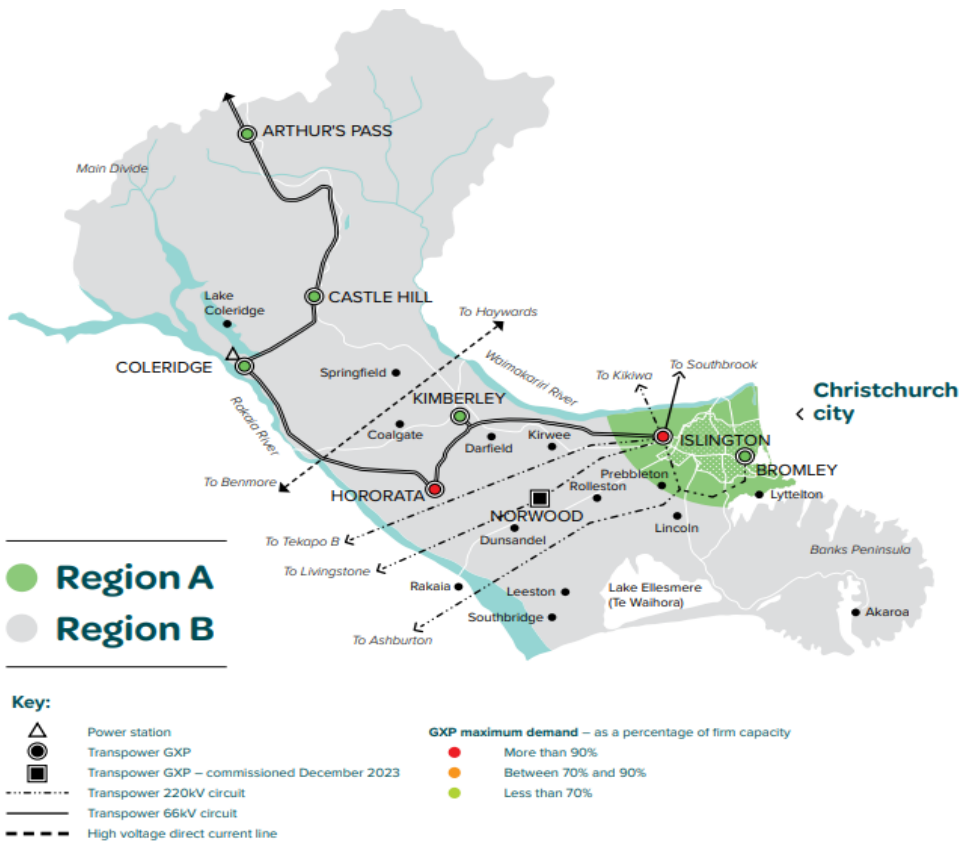
1. Region A – Christchurch city and outer suburbs, including Prebbleton, approximately 83% of our customers,⁷ and
2. Region B⁸ – Banks Peninsula, Selwyn district and townships, approximately 17% of our customers.

⁶ For example, we have budgeted \$4,300,000 in vegetation management operational expenditure for 2024 financial year.

⁷ Region A Grid Exit Points (GXP) are located at Islington and Bromley and supply Christchurch Central City, Lyttelton and the wider Christchurch metropolitan area. Islington and Bromley 220kV substations form part of Transpower's South Island grid. They interconnect between the major 220kV circuits from the southern power stations and our 66kV and 33kV subtransmission network. Islington has a 66kV and 33kV grid connection, while Bromley supplies a 66kV grid connection only.

⁸ Islington GXP also supplies a large part of the Region B network including Banks Peninsula, milk processing near State Highway 1, irrigation east of State Highway 1, and the Dunsandel, Rolleston and Lincoln townships. Hororata and Kimberley GXPs supply a significant proportion of inland irrigation load and milk processing. These two GXPs have a connection to the double circuit 66kV line between Islington and the West Coast with generation injection at Coleridge power station. Transpower provides a 66kV connection at Kimberley and a 66kV and 33kV connection at Hororata. Norwood GXP, when operational, will also supply this area. The remainder of Region B is fed at 11kV from three small GXPs at Arthur's Pass, Coleridge and Castle Hill. Together these supply less than 1% of our customers and load.

66. The two regions are connected by critical high voltage lines that cross the area shown as potential future green belt as shown on the map below. These connections are essential as they link Transpower grid exit points with the distribution system.



Practical Implications for Orion

67. It will be crucial to any green belt proposal that the importance of protecting and maintaining existing strategic infrastructure is recognised. Such recognition should include Orion's distribution lines and cables and allow for new infrastructure to be constructed where required through or across the green belt. In the preceding section we have discussed the possibility of clearance corridors or infrastructure links and Orion considers that such concepts will need to be considered in this context as well.

68. We also refer to our comments above about the risks of planting near electricity infrastructure. This is an issue that Orion is already required to address, the prevention of further negative interactions will need to be considered to ensure reliability of supply and to reduce ongoing cost for consumers in our region.

69. If this proposal progresses, we would be able to work with the Komiti to assist in the development of a successful green belt action plan.

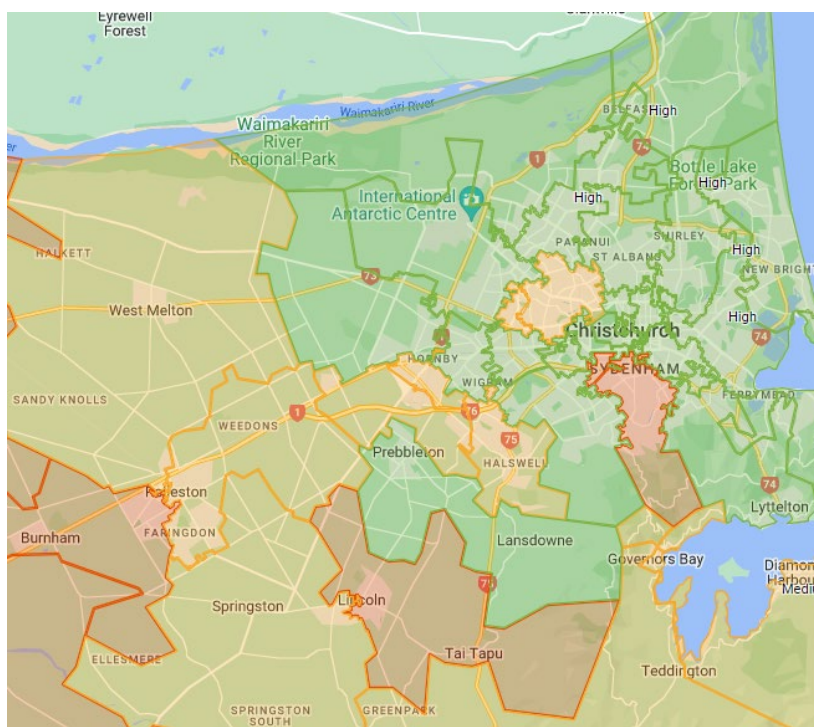
Priority development areas

70. Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. The draft plan notes that these are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration.

71. The Priority Development Areas in the draft Spatial Plan are Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

72. Orion supports in principle the approach to focus on these areas but reiterates the concerns raised above, that the implementation of the Spatial Plan will be of vital importance to the success of its goals. Provisions must be included in policies and plans that actively address the need to upgrade infrastructure to meet increased demand.

73. The map below shows areas where bulk electricity provision may currently be constrained until infrastructure is upgraded. Some of the priority areas fall within red or yellow areas and, as such, the timing of intensification or acceleration of development may need to be planned with an eye to when adequate infrastructure can be provided. Equally, electrification and development in other currently 'green' areas may lead to additional network constraints, depending on a range of drivers and levers which we are exploring through our future energy scenarios, and would be keen to discuss with the Komiti.



74. There are plans for upgrading the bulk supply to some of the red and yellow areas (for example in Rolleston and Halswell), but timing of those upgrades will vary and as such any additional development that results in significantly increased demand will have to be planned to occur in conjunction with the relevant upgrades.

Spatial Strategy

75. The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. It sets out the spatial strategy.

76. Orion **supports** the spatial strategy in principle but submits that some of the directions contained in the opportunities could be further amended or expanded as follows:

Opportunity 2

77. Page 60 and Map 9 refers to protecting strategic infrastructure, noting that urban development should be avoided around strategic infrastructure to ensure the safety and wellbeing of residents and to

safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. Key strategic infrastructure in Greater Christchurch includes Christchurch Airport, the Port of Lyttelton, the inland ports at Rolleston and Woolston, state highway and rail corridors, and the electricity transmission network (see Map 9).

78. There is no specific link to this discussion in terms of a direction statement corresponding to an opportunity. In our view, Map 9 better corresponds with the discussion under direction 5.3. We suggest that Map 9 is moved to this part of the plan along with a new direction statement referring to the protection of strategic infrastructure. We also ask that this discussion is amended to refer to **electricity distribution** as well as electricity transmission. The distribution network is shown on the map but given its importance should also be specifically referred to in the accompanying narrative.

Opportunity 4

79. Direction 4.2 should be expanded as follows:

4.2 *Ensure sufficient development capacity **(including identifying, protecting, and securing land interests needed for infrastructure)** is provided or planned to meet demand*

80. In our view this is crucial to achieving the opportunities identified in the strategy. Early identification of land interests needed for infrastructure for housing and transport developments will better enable this opportunity to be achieved. Ultimately, we think this will be of lower cost in the long run and minimise social disruption.

81. Direction 4.4 should be amended as follows:

4.4 *Provide **a range of choice of healthy homes** taking into account affordability ~~housing choice and affordability~~*

82. We want to emphasise the importance of energy efficient buildings and healthy homes. Energy efficient buildings, especially housing, is critical for an efficient, lower cost / higher societal benefit overall transition to a decarbonised energy system. From our point of view, there is little point in New Zealand investing billions of dollars to enable a low carbon energy system, if the renewable energy supplied to heat, cool, light and maintain a building simply ebbs away through poorly designed, constructed and/or operated buildings. For housing this would further contribute to substandard conditions and energy hardship, as well

as driving our winter peak electricity demand, associated investment in infrastructure, and ultimately costs to our community.

Opportunity 5

83. Direction 5.1 should be amended to also refer to energy infrastructure as follows:

5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links, energy infrastructure and the centres network

84. Many of our commercial and industrial customers are exploring electrification as a pathway to decarbonise their process heat, replacing existing coil boilers and other fossil fuel energy sources. The resulting significant increase in electricity demand will require enabling investment in our network infrastructure.

85. Direction 5.3 should be amended as follows:

5.3 Provision of strategic infrastructure that is resilient, efficient, integrated and meets the needs of a modern society and economy

86. The discussion in relation to direction 5.3 refers to establishing strong partnerships with providers of energy and digital technologies, and ensuring that the planning for telecommunications and energy infrastructure is well integrated with new development. We think this should be emphasised in the opportunity itself.

87. We also highlight the need for a strong focus on energy resilience in the face of increasing climate change physical risk; our community's exposure to earthquakes, particularly an Alpine Fault event; and society's increasing reliance on electricity for critical services, including communication, transport and heat, and so vulnerability to outages.

88. See also our discussion about Map 9 as set out above.

89. In addition to strengthening electricity infrastructure, we see the potential for a network of community energy / resilience hubs as an enabler of community disaster resilience, and potentially broader community benefits. There may be benefit in considering the location and design of such hubs in the Spatial Plan, and we would welcome the opportunity to explore this with the Komiti.

Opportunity 6

90. We submit that a new direction should be included that allows for the electrification of the transport network. For example:

6.5 Enables and supports the electrification of the transport fleet including through charging infrastructure

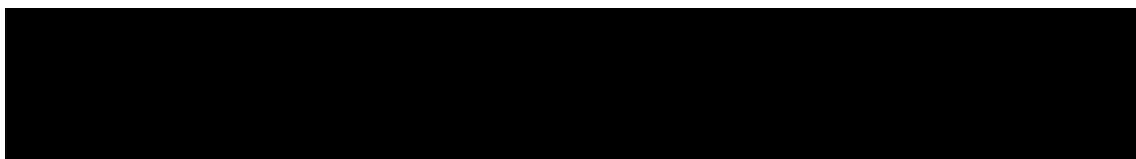
91. As we have said above, we expect growing demand for electricity for transport as fossil fuels are phased out of both private and public transport. We acknowledge and fully support the focus on changing people's travel behaviours and shifting the focus from single occupancy vehicles to more sustainable modes. In addition, the electrification of the transport fleet will be critical to support decarbonisation of the region, and require significant and timely enabling changes to network infrastructure.

92. Charging infrastructure will also be integral to the electrification of the transport fleet. This will include residential charging (on and off street), commercial charging, and workplace charging. The spatial strategy will need to dovetail with the Government's electric vehicle charging strategy when that is finalised and released.

93. People and freight mode shift; the rate of uptake of electric vehicles across our region; together with where, when and how these vehicles are charged, are all important drivers of electricity infrastructure investment, highlighting the importance of integrated planning to achieve our decarbonisation goals.

Concluding comments

94. Thank you again for the opportunity to provide this submission. We would like to be heard in support of our submission when the Komiti holds hearings.

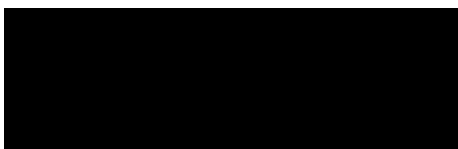


Yours sincerely



Sam Elder

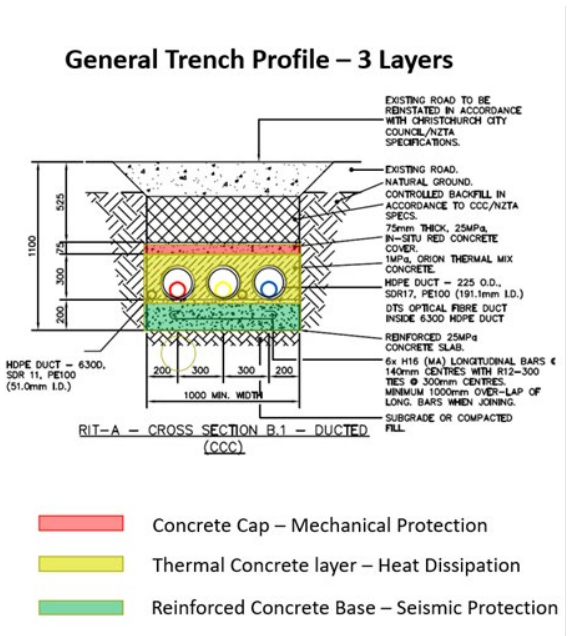
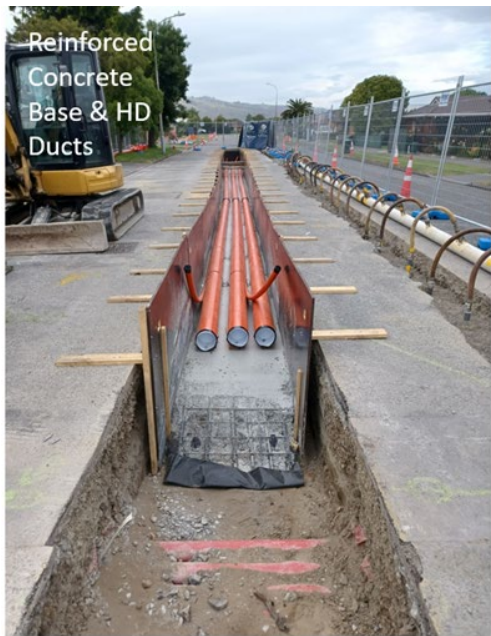
GM Energy Futures



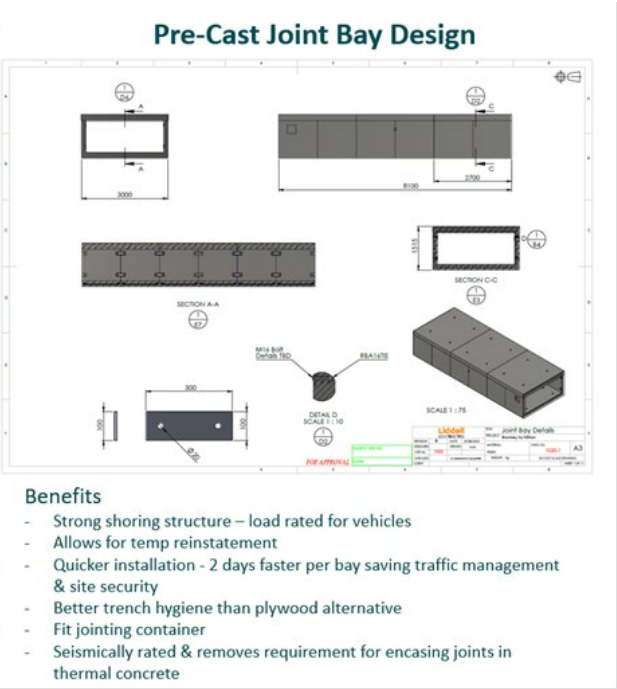
“A”

The trench works and cable installation of a typical 800m long section of high voltage (66kV) cable would usually take approximately 8 weeks. A recent example is the section of cable installed at Ferry Road as part of the Milton to Bromley cable upgrade. This is one section of a 7km cable program.

The scale of the works and the traffic management required can be seen in the images below. The images below show typical cross section of 66kV cable profile & installation with duct and dewatering set ups.



Relocating cable will also require the installation of two joint bays at either end. Below images show joint bay sizing and cable pull set up area required.





Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Anne **Last name:** Scott

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Spokes Canterbury

Your role in the organisation and the number of people your organisation represents:

Submissions Coordinator

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

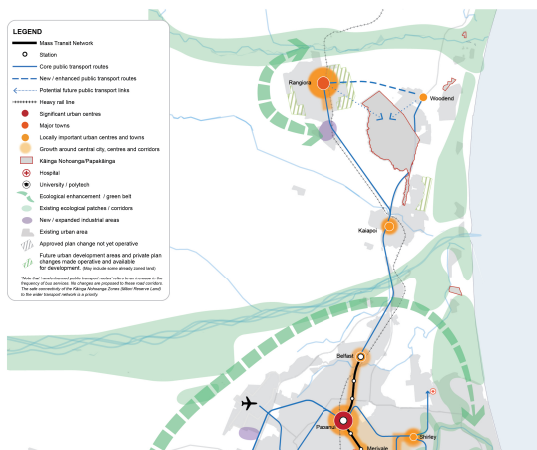
Feedback

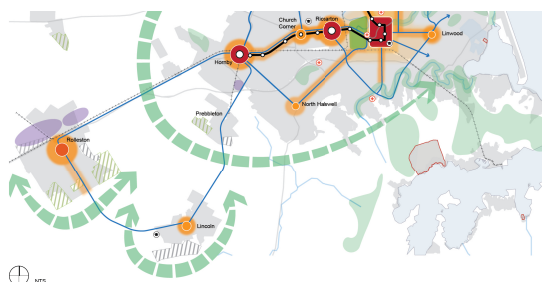
The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)

700,000 - 1MILLION PEOPLE





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

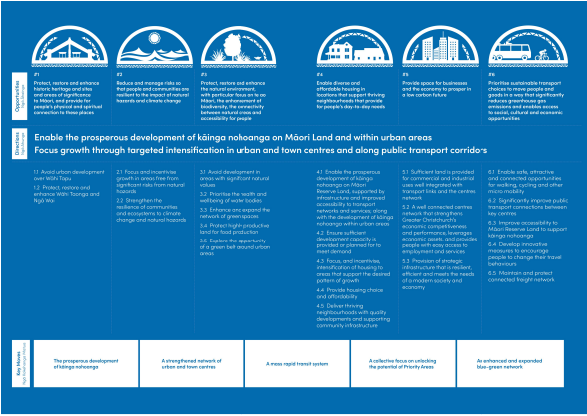
1.5 Do you agree with the approach to focus on these areas?

Yes

Why (please specify the Priority Area):

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Yes

Why:

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

See submission below.

Attached Documents

File
Spokes-Greater-Christchurch-Spatial-Plan-2023-07

351



Draft Greater Christchurch Spatial Plan

Submission from Spokes Canterbury

Reference: <https://ccc.govt.nz/the-council/haveyoursay/show/607>

Tēnā koutou katoa

Thank you for the opportunity to comment on the draft Greater Christchurch Spatial Plan.

Introduction

Spokes Canterbury (<http://www.spokes.org.nz/>) is a local cycling advocacy group with approximately 1,200 followers. Spokes is affiliated with the national Cycling Action Network (CAN – <https://can.org.nz/>). Spokes is dedicated to including cycling as an everyday form of transport in the greater Christchurch and Canterbury areas. Spokes has a long history of advocacy in this space including writing submissions, presenting to councils, and working collaboratively with others in the active transport space. We focus on the need for safe cycling for those aged 8 to 80.

General

Spokes Canterbury:

1. Agrees with the proposed direction of the draft Greater Christchurch Spatial Plan to focus growth around key urban and town centre and along public transport routes however we believe there is an opportunity to also strengthen the relationships between active and public transport which both need to work in harmony together to deliver the expected outcomes.
2. Agrees with the proposed route for the proposed MRT.
3. Agrees with the development of blue/green spaces, corridors and the green belt, that also have good active transport connections.
4. Agrees with the focus on high density areas that facilitate and encourage cycling and walking rather than the current urban sprawl where vehicles dominate.
5. Prefers development areas to be permeable allowing for active transport to easily and safely traverse reasonably direct routes to services
6. Expects the transport plan to complement and enhance the existing cycle network.

Do you support the improved public transport system?

Yes.

Spokes supports a **bus** MRT system for the following reasons

1. There are no tracks that need to be crossed by cyclists or pedestrians which reduces the number of potential accidents.
2. A bus MRT is cheaper and faster to build.
3. It is more flexible. In an emergency as it can be re-routed. This could be for any number of reasons including accident, fire, flood, road-works or earthquakes.

4. Automation will allow a greater variety of bus services to be part of the MRT that can come and go as needed. Rail is far less flexible.

Spokes envisages that for the section Papanui to Church Corner cars would be replaced on street (ie no cars or parking allowed) by the MRT in the centre of the road and the remaining road would be available for cycling (including a separated lane), pedestrians and other forms of active transport, emergency vehicles and maybe some limited form of delivery to businesses at set hours.

There is an assumption that people will live very close to the MRT and that their destination will also be close to a stop. This will be true for a percentage of people but there will be a large number who will need to travel further at one or more ends of their journey. An inability to take you bike with you limits transport choices. Micro-mobility options such as rental e-scooters are seen as a solution but have significant disadvantages. There is a risk that a scooter will not be available for rent at the end of travel when needed. Technically you need to be over 18 to use the service. It is expensive and is highly likely to cost more than the MRT service for each journey. Older people have low usage rates of rentals.

Spokes strongly supports the ability to take bikes (including e-bikes) on the MRT services as on the current Metro services. Spokes does not agree with the concern about the time taken to load and unload a bike onto the bus MRT as it is normally quite fast. There could be a special compartment for bikes and other forms of active transport at the back of the bus where these could be wheeled in and out. You can take bikes on many international MRT systems.

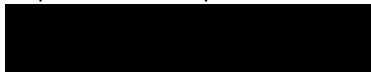
MRT needs to be more convenient than travelling by car but the average time does not need to equate to a car travelling at a particular speed, and it should include the time taken to park and walk to your destination. A MRT can be made more desirable by requiring vehicles to travel a less direct route, providing limited paid parking options for vehicles, providing wifi on the MRT, ensuring the MRT is comfortable and safe, and carefully choosing convenient stops.

Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes.

There are significant health benefits in living in close proximity to the natural environment. These areas should be accessible by cycling and walking.

Anne Scott
Submissions Co-ordinator
Spokes Canterbury



Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 20/07/2023

First name: Anne **Last name:** Scott

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

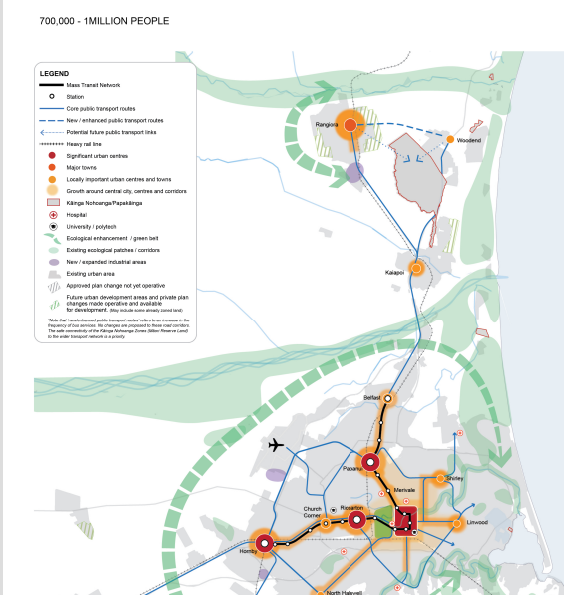
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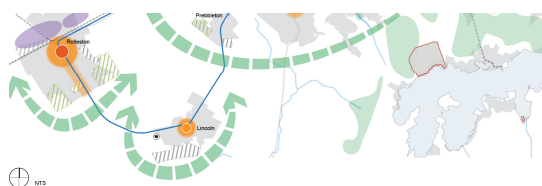
Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

If it is well designed, and integrates seamlessly with other modes including cycling, walking and other forms of active transport. You should be able to put your bike on the MRT to use at destination. Stops need to be close to where people want to go. The Sydney MRT stops are too far apart and too far from key destinations, mainly because they have chosen light rail which is less flexible. Speed is not everything if it sacrifices usability and accessibility.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

Cities work best as a series of villages that meet the unique needs of those that live in the area. Christchurch city center should also have priority for development and the living and cultural centre of greater Christchurch

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

Large areas of Christchurch are, or will likely be, unable to be built on going forward. Too much development and investment is happening in areas that are likely to flood or have good agricultural soils. Further earthquakes and sea level and water table rise is inevitable. There are also significant health benefits in living in close proximity to the natural environment. Management of the natural environment should include protecting our seas as well as our waterways.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

And a Bluebelt around our ocean coastlines, including marine reserves and careful placement of offshore wind farms. It is increasingly clear that a healthy marine environment is essential to reducing the impacts of climate change.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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to adapt to the impacts of climate change and to strengthen resilience.

1.5 Do you agree with the approach to focus on these areas?

Partially
Why (please specify the Priority Area):

While I see the need for Rolleston and Rangiora development, the first priority should be Papanui, Central City, Riccarton and Hornby. Getting the MRT up and running is a critical incentive to high density development. High density needs to be done well. There is a huge difference between high density in central Paris and wastelands of the tower blocks of East London

While these areas are a priority the rest of Christchurch requires continued ongoing development. The Northwest of the City has been neglected ever since the earthquakes.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Yes
Why:
It is a good vision.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 19/06/2023

First name: Chessa **Last name:** Crow

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

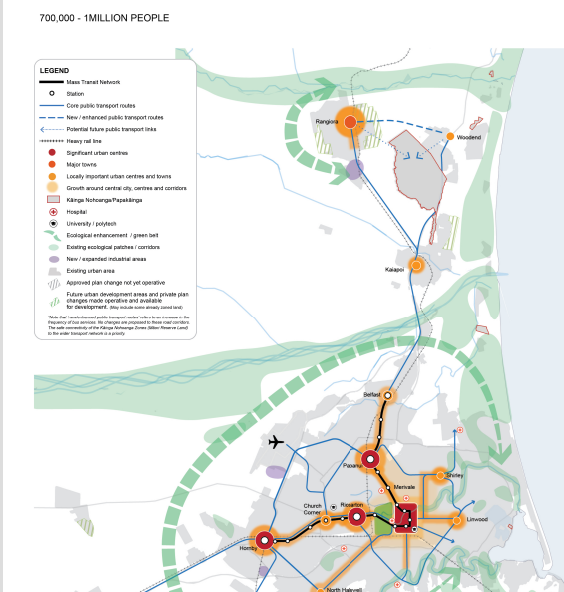
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(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

No

Why:

There is no linking of the East into the transport plan.

The routes seem to stop at Shirley and Linwood.

There are hundred of people who live east of those suburbs and NOTHING is showing on this map to move them into the city.

We have RIDICULOUS land zoning and building happening here and horrible townhomes replacing single family dwellings and they are being built without parking spaces or garaging for cars but there is no inclusion of the east into the public transport plan.

WAKE UP.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

Yes.

Focus is IN THE URBAN CORE and URBAN CENTRES and ALONG TRANSPORT ROUTES.

NOT AT THE BEACH where there are few to poor transport options and clearly none in the future plans.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

Yes. I fully support this.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

And keep housing densities LOWER in these areas.

REDUCE the recession plane to allow sunlight to reach people's homes.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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1.5 Do you agree with the approach to focus on these areas?

Partially

Why (please specify the Priority Area):

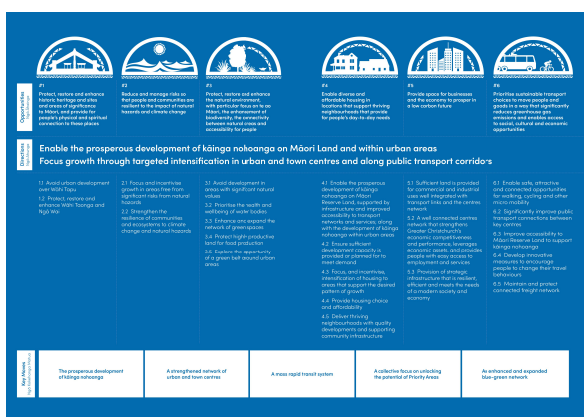
My support depends entirely on WHAT the development is.

If it's more Williams Corporation junk, of zillions of people crammed into tiny unliveable footprints, then NO, I DO NOT SUPPORT any accelerated or significant development AT ALL.

Accelerated development never leads to anything good. It leads to cutting corners and crap being rammed down people's throats at a cost and benefit to NOT the neighbourhood!!!!

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Partially

Why:

How can we move forward with these when they contradict each other?

I fully support #2.

Dont cram hundreds of horrible townhouse developments between the sea and the estuary with only 3 ways (over bridged) out of the suburb!!!

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

I have lots of feed back on my neighbourhood having been zoned as Medium Density Residential and cowboy 'developers' being backed by the 'spatial plan' to tear down perfectly good houses and build mammoth monstrosities (townhouses) with little to no parking or garaging but there is zero transport to/from the area and zero depicted in the future plans too.

I live in fear every day that my neighbour is going to sell their property and my home will be cut off from all sunlight because someone will come along and build a two or three story building in the current ones space. We live a block from the beach and this area is a coastal/estuary area and should be treated as such. So not allow for major intensification between the sea and the estuary.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 06/07/2023

First name: Ella **Last name:** McFarlane

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

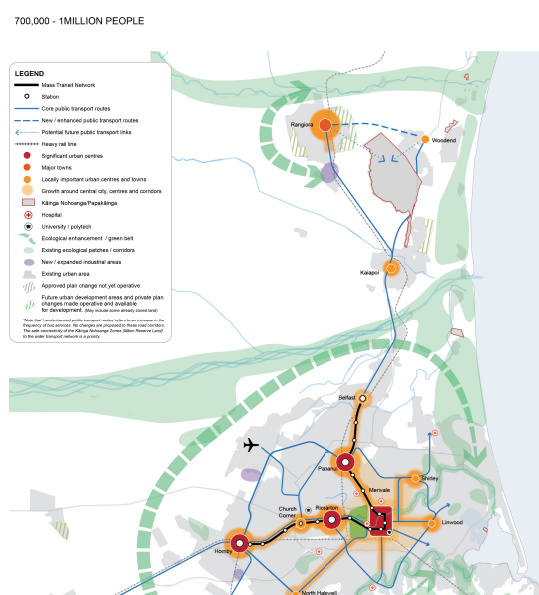
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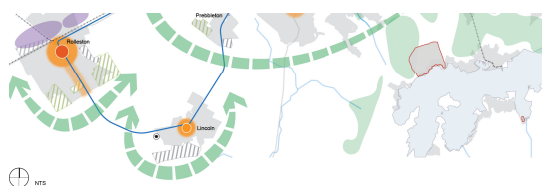
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(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

I support the maintenance of current public transport routes and increased interconnection between towns outside of Christchurch City because it provides a cheaper alternative for transport for our younger and more vulnerable populations. There are people who cannot drive, and due to permanent medical reasons, may never be able to drive. As well as younger people and people in material hardship, they deserve the ability to be able to travel to as many points as possible within both Christchurch City proper and the surrounding districts as it provides them greater financial mobility (being able to use reliable transport to get to work), and also enhances mental and social wellbeing by giving them the ability to independently see friends and family and explore whatever parts of the region they wish to see.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

The green belt approach has worked for London, and can work for us. Christchurch, and New Zealand at large, has a unique environment that is worth protecting.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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1.5 Do you agree with the approach to focus on these areas?

Yes

Why (please specify the Priority Area):

I specifically support the approach to develop the East, as it feels that often the East is excluded from conversations about the future of Christchurch when it is an area full of community, life, and potential.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Partially

Why:

Another value that I feel that this plan should include is to support the future of the people of Christchurch and the city through supporting local businesses, providing training opportunities, and providing resources that help take care of the hauora of the people and give people, particularly younger people, the opportunity to get involved in the community to ensure it's survival into the future.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Selena **Last name:** Coombe

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Styx Living Laboratory Trust, Partner of
Community Waterways Partnerships

Your role in the organisation and the number of people your organisation represents:

Environmental Advocacy Volunteer

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

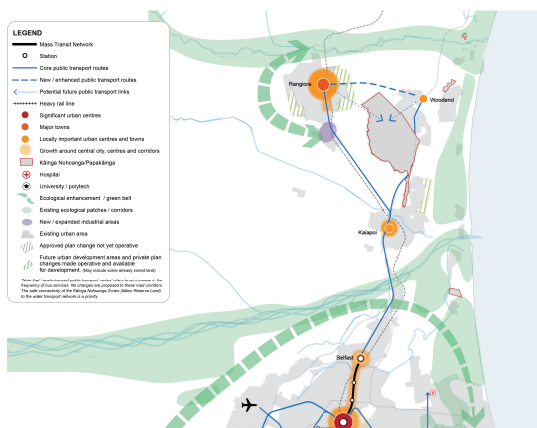
Feedback

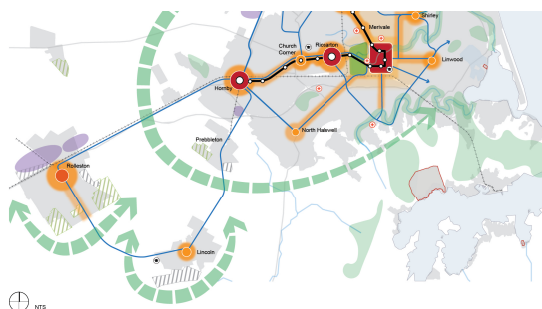
The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)

700,000 - 1MILLION PEOPLE





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Unsure

Why:

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Unsure

Why:

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:


- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

1.5 Do you agree with the approach to focus on these areas?
Yes
Why (please specify the Priority Area):

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



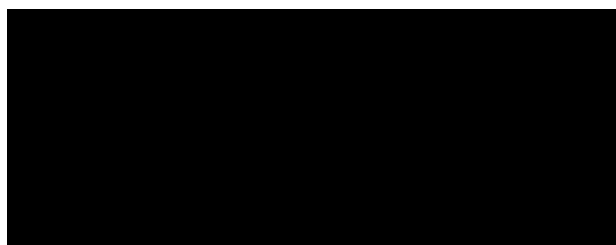
1.6 Do you agree with the draft spatial strategy outlined above?
Yes
Why:
Please view supporting document.

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?
I have included supporting document which outlines the Styx Living Laboratory Trust submission on the plan.

Attached Documents	
File	
StyxRiver Greater Christchurch Plan Submission	



Styx Living Laboratory Trust Submission on the Draft Greater Christchurch Spatial Plan



Thank you for the opportunity to make a submission on the Draft Greater Christchurch Spatial Plan. The Styx Living Laboratory Trust is thankful for the considerable effort put into preparing the Plan.

This submission has been prepared by members of the Styx Living Laboratory Trust.



Summary of the Styx Living Laboratory Trust

The Styx Living Laboratory Trust (SLLT), is a local river care group. The Trust was officially formed in 2002 and has since encompassed a role of guardianship and advocacy for the Pūharakekenui (Styx) River and the biodiversity of the surrounding land as a living part of the Canterbury landscape.

Our Whāinga(Objective) is achieving *Vision 3* in the CCC document called "Vision 2000-2040 – The Styx" i.e. developing a "Living Laboratory" by:

- a. Raising awareness and understanding of the Pūharakekenui catchment and its environs including its ecology, drainage, landscape, culture, heritage and recreation values;
- b. Promoting the use of the Pūharakekenui (Styx) River Catchment as a collective resource for environmental and social research, and to maximise opportunities for community involvement in research and learning;
- c. Working collaboratively with other organisations or people to form partnerships to achieve the above objective and using memoranda of understanding where appropriate;
- d. Assisting other people and other organisations to achieve the remaining Visions in "Vision 2000 – 2040 – "The Styx" namely:

Vision 1 – Achieving a viable spring fed ecosystem

Vision 2 –Creating a "Source to Sea Experience"

Vision 4 – Establishing The Styx as "a place to be"

Vision 5 – Fostering Partnerships

Arising from the eastern edge of Christchurch Airport, and discharging into the Brooklands Lagoon, the Pūharakekenui (Styx) River and its tributaries are a spring fed river ecosystem skirting the Northwest edge of Christchurch. Approximately 25 km in length, the entire Pūharakekenui catchment covers an area of approximately 7000 ha. The Pūharakekenui is home to many species of freshwater fish, wetland birds and is an important source of mahinga kai for Ngāi Tūāhuriri.

We, the trustees and volunteers, are advocates for maintaining water quality and other values (including drainage, ecology, landscape, culture, recreation, and heritage values) in the river. We care deeply about our water and want it to remain clean, healthy, biodiverse and available for future generations to use and enjoy.



General Comments

We (SLLT) are advocates for protecting the health and values of the Pūharakekenui and as such we generally **strongly support** all initiatives which protect and enhance the ecological values of the Pūharakekenui catchment and assist with establishing the Pūharakekenui as a viable spring-fed river ecosystem.

Commentary

SLLT **strongly supports** the following:

1. The inclusion of the Pūharakekenui and its many streams as places to protect on Map 5, and the accompanying Goal 3.1 to avoid development in those areas. Protecting the entire river system, down to the small feeder streams and channels, is vital for the health of the river, and the catchment level management approach this plan champions.
2. Goal 3.2; to prioritise waterway health. The Trust **recommends** that the examples given on page 63 (supporting restoration and enhancement, setting developments back from waterways, day-lighting, water sensitive urban design, and developing riparian buffers) be codified along with similar practices into a clear list of healthy waterway development practices that should be required wherever reasonable. These practices are all straight-forward and deliver long term benefits. Codifying them will provide clarity for planners and developers around the Plan, and ensure waterway health opportunities are not missed.
3. Goal 3.3; to enhance and expand the green spaces network, specifically along rivers. The Trust and the Council have worked together to develop and connect green spaces along the Pūharakekenui for the Source to Sea project, and feel this goal is important to the long term ecological and cultural health of Greater Christchurch.
4. Goal 1.2; to protect, restore, and enhance Ngā Wai . The Pūharakekenui has significant cultural values, and we support this plan recognising and aiming to enhance those values. The designation of the Kāpūtahi area as wāhi tapu is similarly appreciated.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: David **Last name:** Hawke

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Halswell Residents Association

Your role in the organisation and the number of people your organisation represents:

Secretary

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

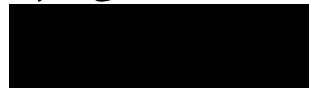
File
HRA Greater CHC Spatial Plan submission



Halswell

RESIDENTS ASSOCIATION (inc)

The Chairman:



Submission: Draft Greater Christchurch Spatial Plan

Date: 21 July 2023

Standing: Halswell Residents Association (Inc.) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of 9 members, and we hold monthly meetings open to the public. For submissions such as this, a draft is circulated to our committee and consensus obtained before the final version is submitted and minuted at the next monthly meeting.

The Association Chairperson is John Bennett; David Hawke is Secretary; Adele Geradts is Treasurer. The Association can be contacted by email at



Introductory comments

- Our Submission focuses on part of the Draft Plan that directly affects Halswell, particularly transport - related.
- One of 8 key themes listed in the Draft Plan from Huihui Mai Engagement process was: "To use their cars less, people want more frequent, more reliable and more direct public transport" (p 6). We totally agree.
- In our view, the key statement in the Draft Plan is: "Focus growth through targeted intensification in urban and town centres and along public transport corridors". Then "Opportunities 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities
 - 6.1 Enable safe, attractive and connected opportunities for walking, cycling and other micro mobility;
 - 6.2 Significantly improve public transport connections between key centres;
 - 6.3 Improve accessibility to Māori Reserve Land to support kāinga nohoanga;
 - 6.4 Develop innovative measures to encourage people to change their travel behaviours;
 - 6.5 Maintain and protect connected freight network."

Our detailed response

1. We totally agree with the Key Theme around frequent, reliable and direct public transport. Unfortunately, in the Halswell area there is a very long way to go before these attributes are realised and the Draft Plan fails to take this into account.

- a. Our surveys tell us:
 - i. The primary destination for Halswell PT users is along Halswell Road, Lincoln Road to Christchurch Hospital and the central city.
 - ii. Both potential and existing bus users do not like changing buses part way through their journey.
 - iii. 32% of people in Halswell do not have a bus stop within easy walking distance.
 - iv. 54% would not feel happy sending an 8 or 80 year old off to the nearest bus stop unaccompanied.
 - v. 26% have “complex” journeys eg dropping off children to child care or to school while on the way to work.
- b. Due to recent greenfields development, a large part of Halswell running south and west from Sutherlands Road to Country Palms has no bus service. The exception is the #100 bus that runs to Riccarton from Halswell School.
 - i. Despite this enormous gap in coverage, ECAN has decided not to review bus routes in Halswell for the foreseeable future.
2. Proposal for a “Core PT route” along Halswell Road to North Halswell then to Hornby
 - a. Unfortunately, we do not see how this “Core PT route” could be realised without severely disrupting PT from Halswell toward the central city.
 - i. Waka Kotahi is about to start construction of a PT priority and separated bike infrastructure along SH 75 north of Dunbars Road. This project will start (this year) with signalising the Aidanfield Drive – SH 75 intersection.
 - ii. Buses travelling toward the central city from Halswell would need to link across SH 75 (via a right turn) into North Halswell to allow passengers to get on the bus to Hornby. These city-bound buses would then need to turn right (again) to re-join SH 75. None of the detailed designs we have seen show buses being taken into North Halswell, yet this is what would need to happen if the map in the Draft Plan is to actually happen.
 - iii. The only way we can see this working is for SH 75 to be re-routed through North Halswell, but this seems unlikely for all sorts of reasons.
 - b. The South West Area Plan (2009) envisaged a PT interchange of some sort at North Halswell.
 - i. This PT interchange takes on new significance given the deficiencies in PT coverage in Halswell, and seems to be part of the Draft Spatial Plan.
 - ii. This PT interchange must not require city-bound bus passengers from Halswell to change buses. A good model is the Christchurch Hospital “super stop”, rather than the central city exchange.
 - iii. However, if it can be built without disrupting PT from Halswell, the PT interchange may provide an opportunity for presently uncatered-for Halswell residents if “park and ride” options are provided at the PT interchange. The difficulty here is that land will need to be set aside for this purpose. It is up to Greater Christchurch Partnership to ensure that this provision is made, and the final version of the Spatial Plan would be a good place to do it.
 - iv. The PT interchange will also provide an opportunity if secure, covered bike and e-scooter facilities are provided; this is the “last mile – first mile” principle.
3. The Draft Greater Christchurch Spatial Plan may be too late for North Halswell.

- a. There are already two consented commercial developments, at 20 Monsaraz Boulevard and 201 Halswell Road respectively.
- b. Unless the “Urban Growth Partners” get a move on, there will be no land available for a PT interchange, no land for supporting park and ride, and the Core PT route from the central city to Hornby via North Halswell will not work.
- 4. The “Urban Growth Partners”.
 - a. Our experience is that the Greater Christchurch Partnership is an evasion in responsibility by the various partners. Two examples:
 - i. The inaction by Christchurch City Council in purchasing or otherwise allocating land for “park and ride” from the existing part of Halswell.
 - ii. The refusal by ECAN to conduct a PT route review for Halswell; or, alternatively, the willingness of Christchurch City Council to issue subdivision consents for areas that will not be serviced by PT.

Requested changes to the Draft Plan

- 1. Name the “Urban Growth Partner” responsible for each Direction, Action or Initiative. This applies throughout the Draft Plan.
- 2. Specify a location for a PT interchange for North Halswell, with supporting park and ride, and covered and secure bike and scooter storage. These details need to include access to and from SH 75.
- 3. Additions to the “Directions” on p 85:
 - a. Direction 6.1 (p 85): add reference to connecting active forms of transport to PT hubs via the “last mile – first mile” principle.
 - b. Direction 6.1 (p 85): add reference to the needs of the young and the old, via the “8 – 80 city” principle.
 - c. Direction 6.1 (p 85): add reference to gendered perceptions of safety around active transport, bus stops, and PT.
 - d. Direction 6.4 (p 85): add reference to the need to cater for folk with complex journeys, noting that many of these people will be women.
 - e. Direction 6.4 (p 85): add reference to purchase of land for park and ride at PT hubs and interchanges.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 24/07/2023

First name: Patricia **Last name:** Harte

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Urban Estates Ltd

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
Urban Estates Ltd SUBMISSION on DRAFT GREATER CHRISTCHURCH SPATIAL PLAN_

SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

TO: Greater Christchurch Partnership
huihuimai@greaterchristchurch.org.nz

1. Submitter Details

Submitters name: Urban Estates Limited

Address For Service:

Contact person:

Phone:

2. Draft Spatial Plan:

We welcome the opportunity to make a submission on the draft Greater Christchurch Spatial Plan (The Spatial Plan).

Details of our submission on the Spatial Plan are set out below.

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

2.1 Do you support the improved public transport system proposed in the draft Spatial Plan?

✓ Partially

Reasons

We support the improvements to the public transport system in principle, but it is not clear that the delivery of the Mass Rapid Transit system (MRT) system as proposed is feasible nor affordable and have concerns that any focus on implementing the proposed MRT will come at the cost of not delivering on an improved wider public transport system for the Greater Christchurch area.

The Spatial Plan has a very strong emphasis on a MRT system. Focusing on the proposed MRT should not come at the cost of improving the existing public transport system, particularly the public transport system which does not meet the current needs of the community.

While we recognise that Opportunity 6 of the Spatial Plan seeks to '*prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities*' it is not clear how or when this will be achieved. Delivery of a satisfactory public transport system that meets the current needs of the community in the Greater Christchurch area has been a perennial issue for those agencies responsible for delivering the public transport system.

The current public transport system does not adequately serve existing urban areas with a service that meets the needs of the community and there do not appear to be any plans to improve, or even provide for public transport into recently developed urban areas, or areas which are currently being considered for rezoning for urban expansion in parts of Greater Christchurch (i.e. Halswell, Lincoln, Rangiora, and Rolleston). Given this it is difficult to see how the transformational shift in transport choice, from private motor vehicle to public transport, as articulated and envisioned by the Spatial Plan is achievable.

2.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

✓ No

Reasons

Encouraging and providing for future development should not be limited to areas around the “significant urban centres” and “core public transport routes” shown on Map 2. A broader approach for future development throughout Greater Christchurch is required for the reasons addressed below.

Firstly, due to the large number of additional dwellings and associated services that will be required over the next 30 or so years it is important to enable denser development throughout Greater Christchurch, subject to avoiding land which has important values or is subject to limitations such as natural hazards.

Secondly, it is not critical that people live near “significant urban centres”. These centres are places that most people go to occasionally rather than on a regular basis. The most frequent shopping is at a supermarket which is often done as part of trip to work or home and some other destination. Therefore there is no logistical reason to only encourage and provide for higher densities in these areas.

Thirdly there are real concerns about both the feasibility of providing the necessary level of infill and intensification at the appropriate scale in many of these areas and making this a focus of the Spatial Plan. The feasibility of achieving this is unlikely to be possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners’ reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, sheds and utilities.
- High cost of redeveloping sites which have existing buildings, structures and utilities on them, which in many cases may still have many years of viable use remaining.
- Limited number of development companies that undertake this form of development.
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn¹ and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan are questionable and will be seriously over confident.

Additional areas of concern with the proposed approach include:

- Detrimental effects on amenity effects for those areas subject to infill and intensification, and associated adverse effects on people’s well-being and lifestyle, especially in cases where intensification is carried out in an ad-hoc and piecemeal way, as seems most likely.
- The Spatial Plan does not show future growth areas beyond the 2050 timeframe (see Map 2) and relies solely on infill and development of greenfield areas currently being considered by Council plan changes and District plan reviews. This implies that all future growth to accommodate an extra 300,000

¹ Recent analysis of consent data reveals a clear and overwhelming preference for stand-alone houses in the Selwyn District, which are unlikely to change materially over the short to medium term.

population beyond the 2050 population of 700,000 will be through intensification into existing urban areas. This is at odds with Policy 1 of the NPS-UD which requires that:

Planning decisions contribute to well-functioning urban environment, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

It is also at odds with Central Government's Urban Growth Agenda which is "to improve housing affordability by removing barriers to the supply of land and infrastructure and making room for cities to grow up as well as out." This agenda clearly anticipates providing for growth both out and up, whereas this Draft Spatial Plan provides only for upward development. **Greenfield development is completely ignored in this draft Spatial Plan despite its proven role in providing for housing within Greater Christchurch.** The high number of new houses achieved in recent years by way of greenfield development has occurred for a number of reasons, the most significant of which is that large blocks of land are only available outside existing urban areas. These blocks can and have enabled a large number of new sections and houses to be efficiently created in a relatively short time frame. This has resulted in a variety of housing options being available.

The draft Natural and Built Environment Bill, and associated draft Spatial Planning Bill¹ reinforces and builds on the requirement to provide for housing choice, as set out in Clause 5 – System outcomes, of the NBE Bill:

To assist in achieving the purpose of this Act, the national planning framework and all plans must provide for the following system outcomes:

(a) ...

(b) ...

(c) well functioning urban and rural areas that are responsive to the diverse and changing needs of people and communities in a way that promotes—

(i) the use and development of land for a variety of activities, including for housing, business use, and primary production; and

(ii) the ample supply of land for development, to avoid inflated urban land prices; and

(ii) housing choice and affordability; and

(ii) an adaptable and resilient urban form with good accessibility for people and communities to social, economic, and cultural opportunities; and

A Spatial Plan that emphasises infill without regard to other housing types, and making provision for an ample supply of land would appear to be at odds with the direction of the urban growth agenda, and risks inflating urban land prices and limiting housing choice for the community.

2.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

✓ Yes

Reasons

A healthy natural environment is intrinsically linked with the wellbeing of people and places. It is important to work with nature when considering development for the future, especially in a time of increased risk from the effects of climate change induced weather events and potential sea level rise.

2.4 Do you support the concept of a Greenbelt around our urban areas?

✓ No

Reasons

The concept of a greenbelt in town planning has typically been used primarily to act as a buffer between towns, and between town and countryside with the aim of preventing urban sprawl by keeping land permanently open. We firstly comment that it is not clear from Map 2 what is the future use of land between the Green belt and Existing urban area. This is a critical area of land that may be the most practical and efficient location for growth. If the green belt includes this “no-mans land” it is of such an extent that it potentially forecloses future opportunities for growth and development beyond the life of the Spatial Plan and has the potential to lead to perverse outcomes in terms of future urban growth and development. In addition, large swathes of the green belt as illustrated in the draft Spatial Plan are in areas which are the most logical for future urban growth and development beyond the life of the Spatial Plan.

A policy framework that achieves the same outcomes described by the draft Spatial Plan (an area where there is a dominance of open space for nature, rural production, and recreation. A green belt can be used to provide a large, connected area of natural environment spaces and to limit urban expansion.), but which does not rely on such a blunt instrument as a green belt, will achieve better outcomes and should be sufficient to:

- Provide for open space for nature and recreation.
- Manage inappropriate activities and urban development in or near sensitive areas, such as ecological areas, sites and areas of significance to tangata whenua, and historic heritage buildings, sites and areas
- Manage urban development or to avoid urban development and other activities that will be affected by natural hazards, where development is not a priority in the short to medium timeframe, while still ensuring future opportunities for growth and development beyond the Spatial Plan's life are not foreclosed.

2.5 Priority Development Areas: Do you agree with the approach to focus on these areas?

✓ Partially

Reasons

In principle we support the concept of Priority Development Areas and look forward to working in partnership with the relevant Territorial Authorities and Government agencies to unlock opportunities in these areas.

However we firstly note that the authors of the Spatial Plan have chosen not to consider other housing areas and options which should also be given priority, including well-located greenfield areas.

Secondly, it is unclear what is the intended focus of the various priority development areas, over what timeframes it is to operate, and if for more intensive residential development by way of infill, the extent to which this is feasible. As noted above, while intensification of existing urban areas may appear possible, the feasibility of achieving this is often not possible due to a number of barriers, including:

- Fragmented land ownership, with the ability to re-develop at scale potentially thwarted due to landowners reluctance to sell, or sell at reasonable market rates
- Miscalculating infill capacity by failing to properly account for the size, shape, value, and location of existing dwellings, sheds and utilities.
- High cost of redeveloping sites which have existing buildings, structures and utilities on them, which in many cases may still have many years of viable use remaining
- Assumes a voracious appetite for much smaller sections sizes than have previously been provided, especially in key townships in Selwyn and Waimakariri, but also in parts of Christchurch City
- Assumption that giving effect to the Medium Density Residential Standards (MDRS) will result in significant levels of redevelopment in accordance with those provisions. There is a strong possibility that this may not come to pass; the MDRS are enabling and there is no requirement on landowners to intensify. In addition, developers often place encumbrances on developments to ensure the quality and amenity of their developments are protected. As such, any assumptions about the potential for infill to provide significantly for increased dwelling capacity in existing urban areas in the Greater Christchurch area over the life of the Spatial Plan should be approached with caution.

2.6 The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. Do you agree with the draft spatial strategy outlined above?

✓Partially

Reasons

Opportunity	Direction	Support/Oppose
1. Protect, restore and enhance historic heritage and sites and areas of significance to Māori, and provide for people's physical and spiritual connection to these places	1.1 Avoid urban development over Wāhi Tapu 1.2 Protect, restore and enhance Wāhi Taonga and Ngā Wai	Support both Directions
2. Reduce and manage risks so that people and communities are resilient to the impact of natural hazards and climate change	2.1 Focus and incentivise growth in areas free from significant risks from natural hazards 2.2 Strengthen the resilience of communities and ecosystems to climate change and natural hazards	Support both Directions but consider that the estimation of risk from climate change is overly optimistic given the timeframe of this spatial plan. Managed retreat should be discussed in detail and provided for.

3. Protect, restore and enhance the natural environment, with particular focus on te ao Māori, the enhancement of biodiversity, the connectivity between natural areas and accessibility for people	<p>3.1 Avoid development in areas with significant natural values</p> <p>3.2 Prioritise the health and wellbeing of water bodies</p> <p>3.3 Enhance and expand the network of green spaces</p> <p>3.4 Protect highly productive land for food production</p> <p>3.5 Explore the opportunity of a green belt around urban areas</p>	<p>Support</p> <p>Support</p> <p>Support</p> <p>Support</p> <p>Oppose in part, for the reasons set out in Section 2.4</p>
4. Enable diverse and affordable housing in locations that support thriving neighbourhoods that provide for people's day-to-day needs	<p>4.1 Enable the prosperous development of kāinga nohoanga on Māori Reserve Land, supported by infrastructure and improved accessibility to transport networks and services;</p> <p>4.2 Ensure sufficient development capacity is provided or planned for to meet demand</p> <p>4.3 Focus, and incentivise, intensification of housing to areas that support the desired pattern of growth</p> <p>4.4 Provide housing choice and affordability</p> <p>4.5 Deliver thriving neighbourhoods with quality developments and supporting community infrastructure</p>	<p>Support</p> <p>Support in part. Amend as follows: 'Ensure <u>at least</u> sufficient ...'</p> <p>Support in part, for the reasons set out in Section 2.2 and section 2.5</p> <p>Support, for the reasons set out in Section 2.2</p> <p>Unrealistic direction as largely depends on economics and attitudes.</p>
5. Provide space for businesses and the economy to prosper in a low carbon future	<p>5.1 Sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network.</p> <p>5.2 A well connected centres network that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets,</p>	<p>While transport links are important future for commercial and industrial uses, generally they do not need to relate to the existing centres.</p> <p>Direction is not required. The centres network is primarily commercial with some</p>

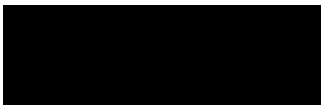
	and provides people with easy access to employment and services	community services. There is therefore no economic reason for these centres to be “well-connected”. They should be able to establish in areas where they are most likely to be viable.
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2.7 Do you have any feedback on other aspects of the Draft Spatial Plan

- The Plan recognises that it will be necessary to incentivise higher density residential living. The previous and now current Christchurch District Plan have provided for higher densities, but there has, until recently, been limited take-up. But even this recent increase in resident units has now reduced. This indicates strongly that unless there are significant incentives that the desired increase in density will not occur. It is not sufficient to enable this development. This is recognised in Direction 4.3 but no examples of this critical component for densification are provided or discussed.
- We agree that focusing growth away from hazardous locations and investing in infrastructure that reduces exposure and adapting urban areas by incorporating functional elements into the blue-green network can all help to reduce some of the risks. However we consider that it is crucial that this is accompanied by managed retreat of existing development that is vulnerable with the next 30 years.
- There are no future areas identified to enable a variety of homes that meet the needs of people in terms of type, price and location beyond 2050 due to total reliance on infill and land currently zoned through various Council Plan Reviews/processes. The Plan does not provide a sufficient justification for this approach. In particular it fails to recognise that critical role that greenfield development has had in providing affordable housing and new and vibrant communities for a wide range people. This approach should be part of the Shared Vision for the future of Greater Christchurch.

3. Hearing options

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



.....

21 July 2023

Signature of person authorised to sign on behalf of submitter.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 25/07/2023

First name: Humphrey **Last name:** Tapper

If you are responding on behalf of a recognised organisation, please provide the organisation name:

Tapper Family Trust

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

Attached Documents

File
draft Greater Christchurch Spatial Plan - Tapper Family Trust - Submission

Before the Committee

In the matter of: the draft Greater Christchurch Spatial Plan

Between: **Christchurch City Council**

Consent Authority

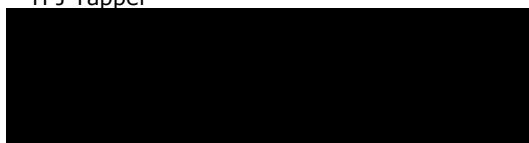
And: **Tapper Family Trust**

Submitter

Submissions on behalf of Tapper Family Trust

23 July 2023

H J Tapper



**SUBMISSION ON THE DRAFT GREATER CHRISTCHURCH SPATIAL
PLAN**

To: Greater Christchurch Spatial Plan Consultation
Greater Christchurch Partnership
PO Box 73014
Christchurch 8154

By email only: huihuimai@greaterchristchurch.org.nz

Name: Tapper Family Trust
[REDACTED]
[REDACTED]

Attention: H J Tapper
[REDACTED]
[REDACTED]

The Tapper Family Trust (the Trust) makes the general and specific submissions on the draft Greater Christchurch Spatial Plan as set out in the attached document.

The Trust confirms its submission does not relate to trade competition or the effects of trade competition.

The Trust would like to be heard in support of its submission.

If other persons make a similar submission the Trust would consider presenting joint evidence at the time of the hearing.

[REDACTED]

H J Tapper

For and behalf of the Tapper Family Trust

Dated 23rd July 2023

BACKGROUND

- 1 This submission is made in relation growth and development on the Port Hills and protection afforded to it pursuant to the draft Greater Christchurch Spatial Plan (the draft Spatial Plan).
- 2 The Trust owns land at 133 and 137 Huntsbury Avenue on the Port Hills being comprised within Certificate of Titles 283237 and 283238 being Lots 2 & 3 DP 369793 and approximately 2.68ha in area (the Land).
- 3 The Land is partly zoned Living Hills with the lower slopes of the eastern side zoned Rural Hills under the Christchurch City Plan. The area zoned Living Hills is relatively clear while the remainder of the site being zoned Rural Hills largely consists of exotic pine.

DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

- 4 The draft Spatial Plan was notified on 19 June.
- 5 The Trust is generally supportive of the draft Spatial Plan however it seeks better recognition of development potential of appropriate areas on the Port Hills where appropriate.

KEY ISSUES

- 6 The Trust seeks recognition within the draft Spatial Plan that growth and intensification on the Port Hills, 'in pockets' is appropriate. For example, where such growth is readily able to be absorbed i.e., those locations surrounded by existing development, being below ridge lines and with no prominence or significance be acceptable.

RATIONALE

- 7 The Trust considers the focus on Priority Development Areas within the draft Spatial Plan is too restrictive. It misses an *easy* opportunity to provide a general direction or signal towards the infilling on the Port Hills where appropriate. That is, the blanket restrictions proposed on the Port Hills in accordance with *Part 1 – Areas to protect, avoid and enhance* seem disproportionate and may arbitrarily and unnecessarily restrict growth in places where it is acceptable to do so. This is especially the situation where such areas are located close to the City Centre and with the ability to utilise existing infrastructure.
- 8 In this regard we note the Hon David Parker as Minister for Environment in moving that the Natural and Built Environment Bill be read a second time stated:

"...

Consenting costs have ballooned and urban land prices soared. Overly restrictive planning rules have hindered much-needed housing and other development. No one is enforcing intensification, but plans have prevented people doing what they wanted and the country needs.

..."

- 9 Accordingly, we believe providing some balance to intensification/infilling within appropriate pockets of the Port Hills in the draft Spatial Plan would:
 - (a) address a practical need to access land for housing;
 - (b) allow growth that is acceptable to the community;
 - (c) be more sustainable due to the location being within the existing urban environment;
 - (d) be efficient by utilising land already available;
 - (e) improve resilience (by spreading development across the various available pockets on the Port Hills);
 - (f) provide broader sustainable management gains; and
 - (g) help reduce the effects of climate change;
- 10 Further we consider the recognition of parts of the Port Hills would create linkages to the network of green spaces for relaxation and recreation on the Port Hills. Overall it would promote and enhance the social economic and cultural well-being of the community.
- 11 The Trust also seeks the draft Spatial Plan be made in accordance with the Natural and Built Environment Bill and Spatial Planning Bill.

RELIEF

- 12 At page 51 of the draft Spatial Plan:

Layering all the areas to protect and avoid on top of each other highlights the most constrained areas of Greater Christchurch for development (see Map 5). These areas generally include the eastern areas along the coastline, the Port Hills and Te Pātaka a Rākaihautū / Banks Peninsula, the areas to the north-west of Christchurch, and the areas surrounding Kaiapoi. These parts of the city region are affected by a variety of natural and man-made factors. The presence of Wāhi Tapu, Wāhi Taonga and Ngā Wai are also matters of further significance, where any urban encroachment will require engagement with and

consideration by mana whenua. In noting the above there may be pockets of landholdings within the Port Hills that are appropriate for development and that may be readily absorbed within the environment. In particular infilling and intensification of parts of the Port Hills may occur where considered appropriate.

- 13 At page 52 of the draft Spatial Plan remove any part of the Land from Map 5: Areas to protect and avoid.
- 14 At page 63 of the draft Spatial Plan:

Direction

3.1 Avoid development in areas with significant ~~natural~~ indigenous values
- 15 That in relation to timing the draft Spatial Plan be made in accordance with the Natural and Built Environment Bill and Spatial Planning Bill.
- 16 In addition to all the above, the following relief is also sought:
 - (i) Any additional or alternative relief that achieves the same or similar outcome;
 - (ii) Consequential or ancillary changes to the above or global amendments as required
 - (iii) Such further relief as may be necessary or appropriate to address the reasons of this submission or to give effect to the relief sought

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Benjamin **Last name:** Love

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

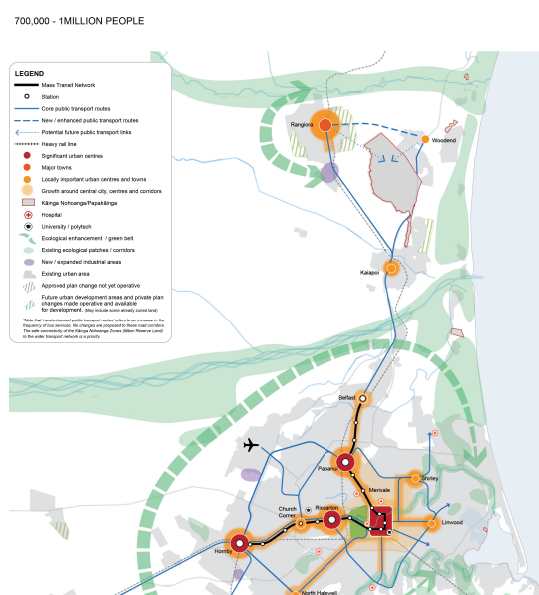
If yes, please provide a daytime phone number above so we can arrange a speaking time with you.

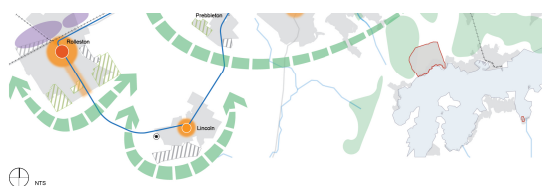
Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

I support Christchurch implementing a new rail based public transportation system.

The proposed route is well suited to a new transit corridor, as historically large portions of the route were tramways. These historic tramways heavily shaped the city, as they became main transport corridors, and spurred growth along the lines, thus creating many suburban centers [1][2]. Reestablishing rail transit along the corridor proposed by the Greater Christchurch partnership will significantly benefit residents in some of the busiest areas in the city, as it will lead to high modal shift, thus decrease car/traffic congestion, and lower transport emissions. It will also spur much needed growth and intensification in well situated areas such as the CBD, Riccarton, Ilam, Merrivale, and Papanui.

Rail should be chosen because it is vastly superior to BRT systems. The energy efficacies (i.e., rolling resistance) of rail make it more sustainable and cost effective in the long term than buses. Rail vehicles/rolling stock (including light rail) can have higher capacity than even largest of buses, lower maintenance costs, as well as significantly longer lifespan. The ability to electrify rail with overhead catenary lines and/or ground supply systems is more efficient and has better long-term sustainability than using battery electric buses. Trains/light rail vehicles can optionally have higher passenger capacities than even the largest of buses and can be coupled together to increase capacity without needing additional drivers, which buses cannot do. Rail is also more attractive to commuters, which leads to the highest levels of modal shift, as well as attracting higher levels of investment and transit-oriented development (TOD). With significantly better life-cycle costs and cost-benefit ratios, rail is the superior option [3][4][5][6][7][8][9][10].

Light rail/tramways are better suited for the urban environment and beatification than BRT systems. All buses (even electric) are louder than modern light rail, as the sound of the rubber wheels rolling creates large amounts of noise when travelling at speed [11][12]. Light rail takes up less street space compared to BRT systems as they run on fixed tracks. Running on fixed tracks also allows light rail to run in pedestrianized areas, which buses cannot. Light rail/tram tracks can be embedded into a variety of surfaces to suit the visuals of the street, including grass. Grass tracking is affordable, and can also help with water drainage, as well as mitigating the urban heat effect and noise [13].

There should be strong consideration to remove road vehicle traffic (except for emergency, necessary service vehicles) from Greater Christchurch purposed street running transit corridor, especially in main commercial and residential areas, such as the CBD, as well as around Riccarton, Northlands, and Merrivale malls. Cars negatively impact the pedestrian and urban environment, making them less attractive to be around. Car centric areas and roads near street-running public transit can even decrease the transits usability, attractiveness, and patronage [14][15]. Most of the purposed transit corridor has nearby roads that run almost entirely parallel to the route, which can be used for road traffic instead.

However, there should also be greater reconsideration for using existing heavy rail lines/corridors for public transport services. Using existing heavy rail corridors can provide greater coverage at a lower initial cost, as there is the ability to connect more communities, such as Rolleston, Kaiapoi, and Rangiora, as well as potentially Lyttelton and Prebbleton, without having to create entirely new corridors (corridor to Prebbleton will need to be partially reestablished). Most of the track infrastructure already exists and can be reasonably easy to upgrade to be suitable for passenger services. The rail lines can also be electrified to allow more sustainable and efficient services. Services will also likely be faster than using BRT or Light Rail.

There are some issues with using existing heavy rail corridors. Christchurch's current main station in Tower Junction proximity to the heart of the center city is inadequate, as it is not within a reasonable walking distance. Even where the historic Moorhouse station was located is not very suitable. Without good accessibility to the central city, attracting patronage will be difficult. A potential way to solve this problem will be by creating a cut-and-cover tunnel system that provides heavy rail access to station/s at the heart of the center city and make using rail more attractive to commuters. Tourist trains such as the TranzAlpine and Coastal Pacific, as well as potential future long-distance/interregional trains (e.g., to Ashburton, Timaru, and Dunedin) could also this tunnel system (depending on design of tunnel system and/or power method of trains). The high levels of pedestrian/passenger foot traffic that this system would create in the center city will have huge economic benefits to local businesses and the community.

Another issue with using existing rail lines is that the urbanized areas they run through are not as suitable for spurring commercial and residential growth/intensification than the purposed new corridor. This is especially likely for the section of the Main South Line between Hornby and Moorhouse, as it runs mainly through industrial areas. However, since the section of the Main North Line between Riccarton and Belfast mainly runs through residential areas, it could be reasonably suitable for residential and commercial growth/intensification.

A potential option that could be investigated is Tram-Trains. These can operate on both street running/light rail track, as well as heavy rail lines [16]. This could allow for new corridors to be established along key urban growth/intensification areas such as Riccarton Road and then use existing heavy rail lines to connect to places like Rolleston, Kaiapoi, Rangiora, and Lyttelton. This could allow for earlier and more affordable connection to later stage areas planned improved transit by Greater Partnership without needing a new corridor such as Belfast (though later a new corridor could be implemented to spur growth/intensification along it). In the long-term this could also be used to provide express services which bypass street running sections by mainly using existing rail corridors (i.e., Rolleston/Hornby to CBD, without having to go down Riccarton Road).

Though Tram-Train systems can use the same 1,067 mm (3 ft 6 in) narrow gauge rail gauge as New Zealand's heavy rail network, such as Fukui Fukubu Line in Japan, Christchurch's current tourism tram service uses 1,435 mm (4 ft 8+1/2 in) standard gauge track, so these systems will not be able to be integrated if Tram-Trains are chosen [17][2].

For safety reasons all street running light rail/tram lines use reasonably low DC voltages. However, most modern heavy rail lines are electrified with AC voltage, as it is cheaper to implement/operate, because the infrastructure is more affordable, longer electricity transmission distances, less substations are needed, and less energy losses occur, as well as provides ability to use more powerful locomotives/rollingstock. However, there is the option to implement rolling stock which can alternate between the voltage, which could be suitable for a Tram-Train system [18].

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

I support focusing future development and investment around urban centres and transport corridors. However, the Greater Partnership draft submission does not allow for enough intensification, and long-term growth. Also, the need to be the prevention of low-density greenfield suburban sprawl. Other existing areas of the city should still be allowed to intensify.

Intensification is a sustainable way to provide affordable residential/housing to the masses and improve the lifestyles of residents.

Intensification is often linked to increased housing affordability, as it can quickly and cost effectively increase supply to the market, thus zoning reform is needed to allow for it. It is more affordable to build multi-unit dwellings/apartments than single-detached houses, as they require less land, materials, and labour to build per unit, as well as have lower operating costs [19] [20]. To meet varying demands/needs from different demographics, multi-unit dwellings should be available in a variety of sizes and styles. Priority should also be given to personal buyers, instead of investors [21].

Many choose to live in intensified areas for the improved lifestyle. People like the proximity of stores, services, schools, parks, public transport, and other facilities/amenities within walking distance when mixed-use zoning is allowed. It is difficult to provide the desired levels of amenities within walking distance in lower density areas. Denser areas can also provide a better sense of community, as well as a more active lifestyle [22][23].

Increased affordability and access to amenities can increase the attractiveness of neighbourhoods and cities. This includes attracting new residents/immigrants from other costs can also increase disposable income and expenditure in other sectors of the local economy [24][25].

The highest percentage of car trips in New Zealand are for shopping. People are driving more, and further than they used to, as well as spending more time in congestion [26]. Allowing for mixed-use zoning, combined with intensification will increase walkability and decrease car dependency, time spent driving, as well as personal transportation costs. However, zoning policy needs to change to allow for mixed-use zoning [27][28].

New commercial (especially supermarkets, cafes, restaurants, convenience stores/dairies, and other stores selling essential items), as well as schools, other community facilities should be allowed in residential areas, especially those which are being densified. Commercial buildings can be amongst residential, and apartment buildings can the first few floors designated for commercial.

Transit-Oriented Development (TOD) is a very sensible form of urban planning and development. Focusing large dense commercial areas around public transportation/rail stations, then surrounding that with dense residential. This optimizes the value capture of public transportation, significantly reduces car-dependency/usage, and provides huge benefits to businesses (often from higher foot traffic), as well as the local economy. Increased density around public transportation typically leads to higher ridership [3][29][30][31]. Increasing the walkability of TODs leads to higher ridership and benefits to the community [32][33].

Walkability also has many social benefits, as close access to stores/facilities is linked to increased happiness, livability, more disposable income, and a healthier more active lifestyle [20][21][25][34][35][36].

Implementing high-quality large-scale transit-oriented development will have a major positive impact for Christchurch. Personally, I believe initial focuses for intensification through TOD should be the central city, then along Riccarton Road, as it is already a busy transit corridor, has commercial well suited for intensification, as well as proximity to the central city and the University of Canterbury. However, to get ultimate value capture from the transit corridor station area, higher densities need to be used than purposed (mainly apartments and multistory commercial) within each station's entire main walking distance radius.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

I partially support the proposed strategy to maintain and enhance the natural environment within our urban areas. I heavily support access to green spaces and recreation, as well as the health of the waterways, and protecting productive soils.

My main issue is using the tree canopy as a boundary in some areas of Christchurch to limit or prohibit taller buildings exceeding its height. Limiting building height can make it more difficult to provide the necessary density to support high frequency mass rapid transit, as well as decrease the walkability and increase car dependency [3][20][22]. Too much many key areas for intensification in Christchurch are currently very low-density suburbia. These large suburban lots/single family houses are taking up large amounts of land. Preventing building heights to maintain a perceived tree canopy, limits actual green spaces.

With good large scale urban planning, intensifying existing areas and decreasing car centrality can free up more urban space that can be used for green spaces, public parks, and nature reserves, which can allow for increased number of trees/plants. There should be nothing to prevent trees/green spaces near taller buildings. More people should have access to high quality shared green spaces/parks, instead of private backyards.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

I support the concept of a Greenbelt around our urban areas, both to protect productive rural soils/farmlands, but also for the prevention of new greenfield suburban sprawl. However, where the proposed greenbelt is still allows for too much greenfield development within its boundaries.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

1.5 Do you agree with the approach to focus on these areas?

Partially

Why (please specify the Priority Area):

I heavily support the intensification of all existing areas within Christchurch, especially along main public transit/mass rapid transit corridors.

I support public-private partnerships when implemented through a community lead development cooperative approach. The cooperative approach can provide fair and affordable to the masses, as well as disincentivize private corporations making excess profits.

I heavily oppose allowing almost all greenfield suburban sprawl, including around the surrounding areas of Rangiora and Rolleston.

Most of Greater Christchurch is unwalkable, due to its low-density suburban design, and allowing for more greenfield sprawl only makes it worse. Since the widespread adoption of personal automobiles in the mid-20th century the city has been designed around cars. Quality public transportation, density, and well-designed urban areas are limited to non-existent in most of the city. These poor planning decisions have negatively impacted residents, the local economy, and environment.

On average personal transport usage (car usage) in low density areas is 3.7 times higher than in higher density areas. This also means 3.7 times more vehicle emission. People are forced to travel further distances to get to places. More driving, more greenhouse gas emissions which are a major contributing factor to climate change [37].

In Low density suburbs distances are too far for people to walk, so most people are forced to drive. This is often made worse by euclidean/single use zoning typically found in low density suburbs. Not only is this bad for the environment, but also the economy and society.

It is difficult to provide quality public transit in low density suburban areas, as it is hard to provide ample coverage, as well as make the route economically sustainable [38]. Public transit that is not within walking distance is often considered unattractive by residents, and they chose to drive instead [39][40].

A 2015 report found that the average New Zealand commuter pays \$11,852.98 per annum in car ownership and running costs. This is a substantial amount of the average annual income. However, commuters who did not own a car and used public transportation to commute spent on average \$1,879.32 for transportation costs (saving of \$9,065.78). Car owners that used public transportation to only commute to work spent on average \$9,733.95 for transportation costs [41]. Car transportation costs have likely increased since, and people living in further out from the Christchurch, such as in Rangiora and Rolleston will likely travel more by car. Car ownership and usage is extremely expensive. People need access to quality public transportation, but also the ability to live car-free in an urban/suburban environment. This is very important during a cost-of-living crisis, but also for improved long-term economic stability.

Since people living in low density car dependent areas drive more, they have transportation costs as they spend more on fuel and other car running costs. However, more money is also spent on roading infrastructure, parking, and road maintenance. There is also an economic loss from increased traffic congestion, crashes, and environmental impacts [42].

People living in low-density, single-zoned, and car dependent areas typically have low levels of physical activity, often below recommended levels. Since walking to destinations is unfeasible, and driving is the only option. This is linked to higher rates of obesity, and other health problems. Those in denser, more walkable areas mixed-use areas, with good access to public transport have higher and healthier rates of Physical Activity [34].

Car dependency strips the independent mobility of those who cannot drive. This often affects the elderly, people with certain disabilities, adolescents too young to legally drive, those who can afford to drive, people without access to a car and those who simply choose not to drive. Without access to walkable areas and public transport these people are forced to rely on others who can drive, which is often costly and not always feasible. People without independent mobility often unwillingly have sedentary lifestyles, as well as higher rates of loneliness, depression, obesity, and less of a sense of community [43][44][45][46]

Creating more greenfield car-dependent suburbs increases car traffic and congestion across area [47]. However, attempting to decrease congestion by expanding and widening the roading network leads to induced demand, meaning that overtime car usage will increase, and traffic congestion will become even worse [48][49].

Low density areas have higher supporting infrastructure costs than denser areas, especially for long term maintenance and replacements. These costs put stress on both local councils and government. Rates are often increased, as well as more tax money is spent attempt to fix these problems. Sprawling low density is often deemed economically unsustainable [50][51].

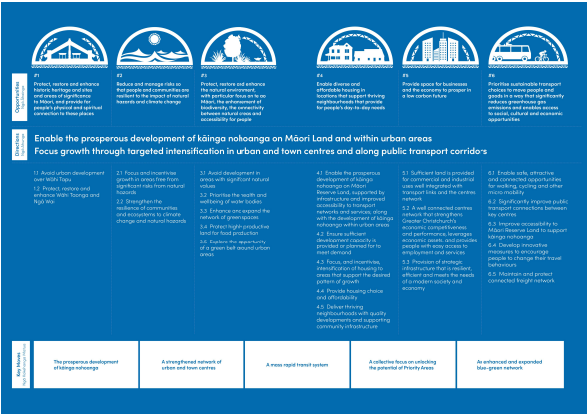
Low density car dependent sprawl areas also negatively impact stress, productivity, and the rate of innovation, as people are spending more time commuting and higher amounts on transportation costs, leading to less free time and disposable income [52][53][54][55].

Greenfield property should not be allowed to have influence in the development of Greater Christchurch, as their long track record of personal greed for profit, over the longer-term wellbeing of residents and the environment is unsuitable for a sustainable future for the region.

I would support the intensification existing areas of Rangiora and Rolleston, however a passenger rail transit connection and intensification through transit-oriented development will be highly preferable to prevent car dependency. However, if no rail transit connection is provided, other areas of Christchurch should be prioritized.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)

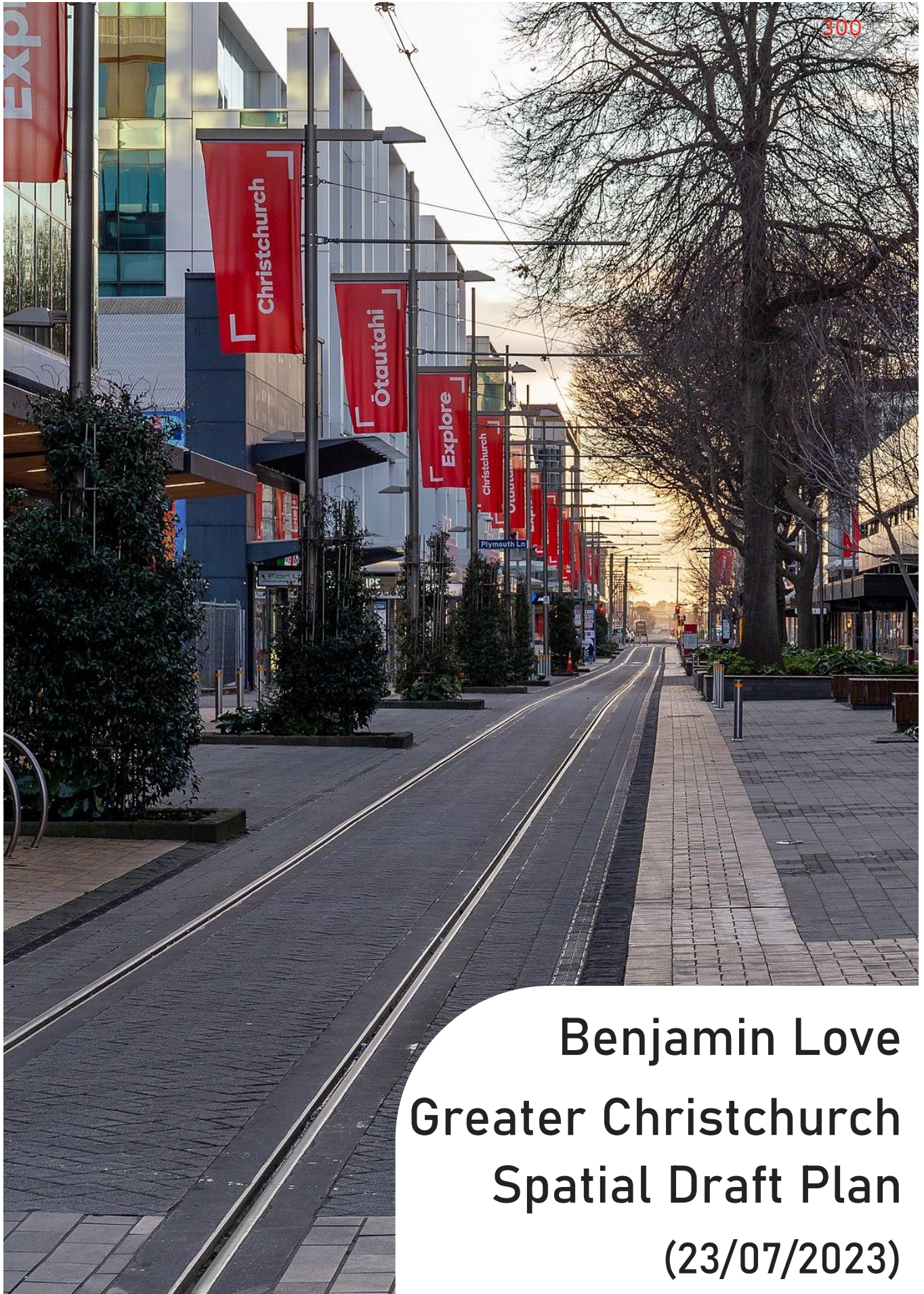


1.6 Do you agree with the draft spatial strategy outlined above?
Partially
Why:

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?
Please read attached PDF for further information and reference list

Attached Documents

File
Benjamin Love Greater Christchurch Spatial Plan



Benjamin Love
Greater Christchurch
Spatial Draft Plan
(23/07/2023)

Thank you for taking the time to read my written submission. I ask that the academic articles referenced are read and analyzed, to take the report as read.

Contents

Support of Improved Rail Public Transport System 2

 Japanese Zoning Laws That Allow for Good Mixed-use Zoning..... 7

Partial support the proposed strategy to maintain and enhance the natural environment within our urban areas..... 8

Support of the concept of a Greenbelt around our urban areas..... 9

Partial support for the approach to focus on these areas 10

Reference List..... 13



Jätkäsaari, Helsinki, Finland

Support of Improved Rail Public Transport System

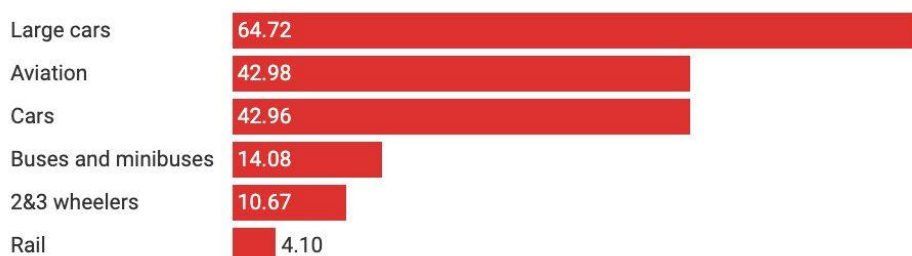
I support Christchurch implementing a new rail based public transportation system.

The purposed route is well suited to a new transit corridor, as historically large portions of the route were tramways. These historic tramways heavily shaped the city, as they became main transport corridors, and spurred growth along the lines, thus creating many suburban centers [1][2]. Reestablishing rail transit along the corridor proposed by the Greater Christchurch partnership will significantly benefit residents in some of the busiest areas in the city, as it will lead to high modal shift, thus decrease car/traffic congestion, and lower transport emissions. It will also spur much needed growth and intensification in well situated areas such as the CBD, Riccarton, Ilam, Merrivale, and Papanui.

Rail should be chosen because it is vastly superior to BRT systems. The energy efficacies (i.e., rolling resistance) of rail make it more sustainable and cost effective in the long term than buses. Rail vehicles/rolling stock (including light rail) can have higher capacity than even largest of buses, lower maintenance costs, as well as significantly longer lifespan. The ability to electrify rail with overhead catenary lines and/or ground supply systems is more efficient and has better long-term sustainability than using battery electric buses. Trains/light rail vehicles can optionally have higher passenger capacities than even the largest of buses and can be coupled together to increase capacity without needing additional drivers, which buses cannot do. Rail is also more attractive to commuters, which leads to the highest levels of modal shift, as well as attracting higher levels of investment and transit-oriented development (TOD). With significantly better life-cycle costs and cost-benefit ratios, rail is the superior option [3][4][5][6][7][8][9][10].

Energy intensity of different passenger transportation modes

■ TOE/million passengers-km



TOE is tonne of oil equivalent, a unit of measure to indicate the amount of energy released in burning one metric ton of crude oil.

Chart: The Conversation, CC-BY-ND • Source: [International Energy Agency](#) • [Get the data](#)

[8]

Light rail/tramways are better suited for the urban environment and beatification than BRT systems. All buses (even electric) are louder than modern light rail, as the sound of the rubber wheels rolling creates large amounts of noise when travelling at speed [11][12]. Light rail takes up less street space compared to BRT systems as they run on fixed tracks. Running on fixed tracks also allows light rail to run in pedestrianized areas, which buses cannot. Light rail/tram tracks can be embedded into a variety of surfaces to suit the visuals of the street, including grass. Grass tracking is affordable, and can also help with water drainage, as well as mitigating the urban heat effect and noise [13].

There should be strong consideration to remove road vehicle traffic (except for emergency, necessary service vehicles) from Greater Christchurch purposed street running transit corridor, especially in main commercial and residential areas, such as the CBD, as well as around Riccarton, Northlands, and Merrivale malls. Cars negatively impact the pedestrian and urban environment, making them less attractive to be around. Car centric areas and roads near street-running public transit can even decrease the transits usability, attractiveness, and patronage [14][15]. Most of the purposed transit corridor has nearby roads that run almost entirely parallel to the route, which can be used for road traffic instead.

However, there should also be greater reconsideration for using existing heavy rail lines/corridors for public transport services. Using existing heavy rail corridors can be provide greater coverage at a lower initial cost, as there is the ability to connect more communities, such as Rolleston, Kaiapoi, and Rangiora, as well as potentially Lyttelton and Prebbleton, without having to create entirely new corridors (corridor to Prebbleton will need to be partially reestablished). Most of the track infrastructure already exists and can be reasonably easy to upgrade to be suitable for passenger services. The rail lines can also be electrified to allow more sustainable and efficient services. Services will also likely be faster than using BRT or Light Rail.

There are some issues with using existing heavy rail corridors. Christchurch's current main station in Tower Junction proximity to the heart of the center city is inadequate, as it is not within a reasonable walking distance. Even where the historic Moorhouse station was located is not very suitable. Without good accessibility to the central city, attracting patronage will be difficult. A potential way to solve this problem will be by creating a cut-and-cover tunnel system that provides heavy rail access to station/s at the heart of the center city and make using rail more attractive to commuters. Tourist trains such as the TranzAlpine and Coastal Pacific, as well as potential future long-distance/interregional trains (e.g., to Ashburton, Timaru, and Dunedin) could also this tunnel system (depending on design of tunnel system and/or power method of trains). The high levels of pedestrian/passenger foot traffic that this system would create in the center city will have huge economic benefits to local businesses and the community.

Another issue with using existing rail lines is that the urbanized areas they run through are not as suitable for spurring commercial and residential growth/intensification than the purposed new corridor. This is especially likely for the section of the Main South Line between Hornby and Moorhouse, as it runs mainly through industrial areas. However, since the section of the Main North Line between Riccarton and Belfast mainly runs through residential areas, it could be reasonably suitable for residential and commercial growth/intensification.

A potential option that could be investigated is Tram-Trains. These can operate on both street running/light rail track, as well as heavy rail lines [16]. This could allow for new corridors to be established along key urban growth/intensification areas such as Riccarton Road and then use existing heavy rail lines to connect to places like Rolleston, Kaiapoi, Rangiora, and Lyttelton. This could allow for earlier and more affordable connection to later stage areas planned improved transit by Greater Partnership without needing a new corridor such as Belfast (though later a new corridor could be implemented to spur growth/intensification along it). In the long-term this could also be used to provide express services which bypass street running sections by mainly using existing rail corridors (i.e., Rolleston/Hornby to CBD, without having to go down Riccarton Road).

Though Tram-Train systems can use the same 1,067 mm (3 ft 6 in) narrow gauge rail gauge as New Zealand's heavy rail network, such as Fukui Fukubu Line in Japan, Christchurch's current tourism tram service uses 1,435 mm (4 ft 8+1/2 in) standard gauge track, so these systems will not be able to be integrated if Tram-Trains are chosen [17][2].

For safety reasons all street running light rail/tram lines use reasonably low DC voltages. However, most modern heavy rail lines are electrified with AC voltage, as it is cheaper to implement/operate, because the infrastructure is more affordable, longer electricity transmission distances, less substations are needed, and less energy losses occur, as well as provides ability to use more powerful locomotives/rollingstock. However, there is the option to implement rolling stock which can alternate between the voltage, which could be suitable for a Tram-Train system [18].



Fukui Fukubu Line, Japan

Support of focusing future development and investment around urban centres and transport corridors

I support focusing future development and investment around urban centres and transport corridors. However, the Greater Partnership draft submission does not allow for enough intensification, and long-term growth. Also, the need to be the prevention of low-density greenfield suburban sprawl. Other existing areas of the city should still be allowed to intensify.

Intensification is a sustainable way to provide affordable residential/housing to the masses and improve the lifestyles of residents.

Intensification is often linked to increased housing affordability, as it can quickly and cost effectively increase supply to the market, thus zoning reform is needed to allow for it. It is more affordable to build multi-unit dwellings/apartments than single-detached houses, as they require less land, materials, and labour to build per unit, as well as have lower operating costs [19][20]. To meet varying demands/needs from different demographics, multi-unit dwellings should be available in a variety of sizes and styles. Priority should also be given to personal buyers, instead of investors [21].

Many choose to live in intensified areas for the improved lifestyle. People like the proximity of stores, services, schools, parks, public transport, and other facilities/amenities within walking distance when mixed-use zoning is allowed. It is difficult to provide the desired levels of amenities within walking distance in lower density areas. Denser areas can also provide a better sense of community, as well as a more active lifestyle [22][23].

Increased affordability and access to amenities can increase the attractiveness of neighbourhoods and cities. This includes attracting new residents/immigrants from other costs can also increase disposable income and expenditure in other sectors of the local economy [24][25].

The highest percentage of car trips in New Zealand are for shopping. People are driving more, and further than they used to, as well as spending more time in congestion [26]. Allowing for mixed-use zoning, combined with intensification will increase walkability and decrease car dependency, time spent driving, as well as personal transportation costs. However, zoning policy needs to change to allow for mixed-use zoning [27][28].

New commercial (especially supermarkets, cafes, restaurants, convenience stores/dairies, and other stores selling essential items), as well as schools, other community facilities should be allowed in residential areas, especially those which are being densified. Commercial buildings can be amongst residential, and apartment buildings can the first few floors designated for commercial.

Transit-Oriented Development (TOD) is a very sensible form of urban planning and development. Focusing large dense commercial areas around public transportation/rail stations, then surrounding that with dense residential. This optimizes the value capture of public transportation, significantly reduces car-dependency/usage, and provides huge benefits to businesses (often from higher foot traffic), as well as the local economy. Increased density around public transportation typically leads to higher ridership [3][29][30][31]. Increasing the walkability of TODs leads to higher ridership and benefits to the community [32][33].

Walkability also has many social benefits, as close access to stores/facilities is linked to increased happiness, livability, more disposable income, and a healthier more active lifestyle [20][21][25][34][35][36].

Implementing high-quality large-scale transit-oriented development will have a major positive impact for Christchurch. Personally, I believe initial focuses for intensification through TOD should be the central city, then along Riccarton Road, as it is already a busy transit corridor, has commercial well suited for intensification, as well as proximity to the central city and the University of Canterbury. However, to get ultimate value capture from the transit corridor station area, higher densities need to be used than purposed (mainly apartments and multistory commercial) within each station's entire main walking distance radius.



Ohanajaya, Tokyo, Japan

Japanese Zoning Laws That Allow for Good Mixed-use Zoning

Twelve categories of Land Use Zone provide a pattern for land-use zoning in each type of urban area. These can be generally categorized into residential, commercial and industrial uses. Each Land Use Zone has specifications concerning the uses of buildings which can be constructed in the zone.

Land Use Zones are allocated according to a future vision of land-use pattern.

Category I exclusively low-rise residential zone



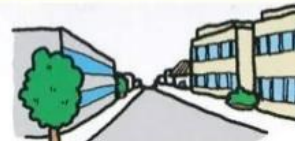
This zone is designated for low rise residential buildings. The permitted buildings include residential buildings which are also used as small shops or offices and elementary/junior high school buildings.

Category II exclusively low-rise residential zone



This zone is mainly designated for low rise residential buildings. In addition to elementary/junior high school buildings, certain types of shop buildings with a floor area of up to 150m² are permitted.

Category I mid/high-rise oriented residential zone



This zone is designated for medium to high rise residential buildings. In addition to hospital and university buildings, certain types of shop buildings with a floor area of up to 500m² are permitted.

Category II mid/high-rise oriented residential zone



This zone is mainly designated for medium to high rise residential buildings. In addition to hospital and university buildings, the permitted buildings include certain shops and office buildings with a floor area of up to 1,500m² to provide conveniences for the local community.

Category I residential zone



This zone is designated to protect the residential environment. The permitted buildings include shops, offices and hotel buildings with a floor area of up to 3,000m².

Category II residential zone



This zone is designated to mainly protect the residential environment. The permitted buildings include shops, offices and hotel buildings as well as buildings with karaoke box.

Quasi-residential zone



This zone is designated to allow the introduction of vehicle-related facilities along roads while protecting the residential environment in harmony with such facilities.

Neighborhood commercial zone



This zone is designated to provide daily shopping facilities for the neighbourhood residents. In addition to residential and shop buildings, small factory buildings are permitted.

Commercial zone



Banks, cinemas, restaurants and department stores are constructed in this zone. Residential buildings and small factory buildings are also permitted.

Quasi-industrial zone



This zone is mainly occupied by light industrial facilities and service facilities. Almost all types of factories are permitted excepting those which are considered to considerably worsen the environment.

Industrial zone



Any type of factory can be built in this zone. While residential and shop buildings can be constructed, school, hospital and hotel buildings are not permitted.

Exclusively industrial zone



This zone is designated for factories. While all types of factory buildings are permitted, residential, shop, school, hospital and hotel buildings cannot be constructed.

Special Land Use District

A Special Land Use District is designated as a supplement to the land-use regulations on the Land Use Zone. It is designated within a Land Use Zone aiming at specific purposes, such as achieving more effective land use or a more pleasant environment. Regulations under Land Use Zone are applied uniformly nationwide. However, in the Special Land Use District, Land Use Zone regulations can be modified by municipal bylaw. In correspondence with the local characteristics, each municipality can stipulate the strengthening or relaxation of Land Use Zone regulations.

Partial support the proposed strategy to maintain and enhance the natural environment within our urban areas

I partially support the proposed strategy to maintain and enhance the natural environment within our urban areas. I heavily support access to green spaces and recreation, as well as the health of the waterways, and protecting productive soils.

My main issue is using the tree canopy as a boundary in some areas of Christchurch to limit or prohibit taller buildings exceeding its height. Limiting building height can make it more difficult to provide the necessary density to support high frequency mass rapid transit, as well as decrease the walkability and increase car dependency [3][20][22]. Too much many key areas for intensification in Christchurch are currently very low-density suburbia. These large suburban lots/single family houses are taking up large amounts of land. Preventing building heights to maintain a perceived tree canopy, limits actual green spaces.

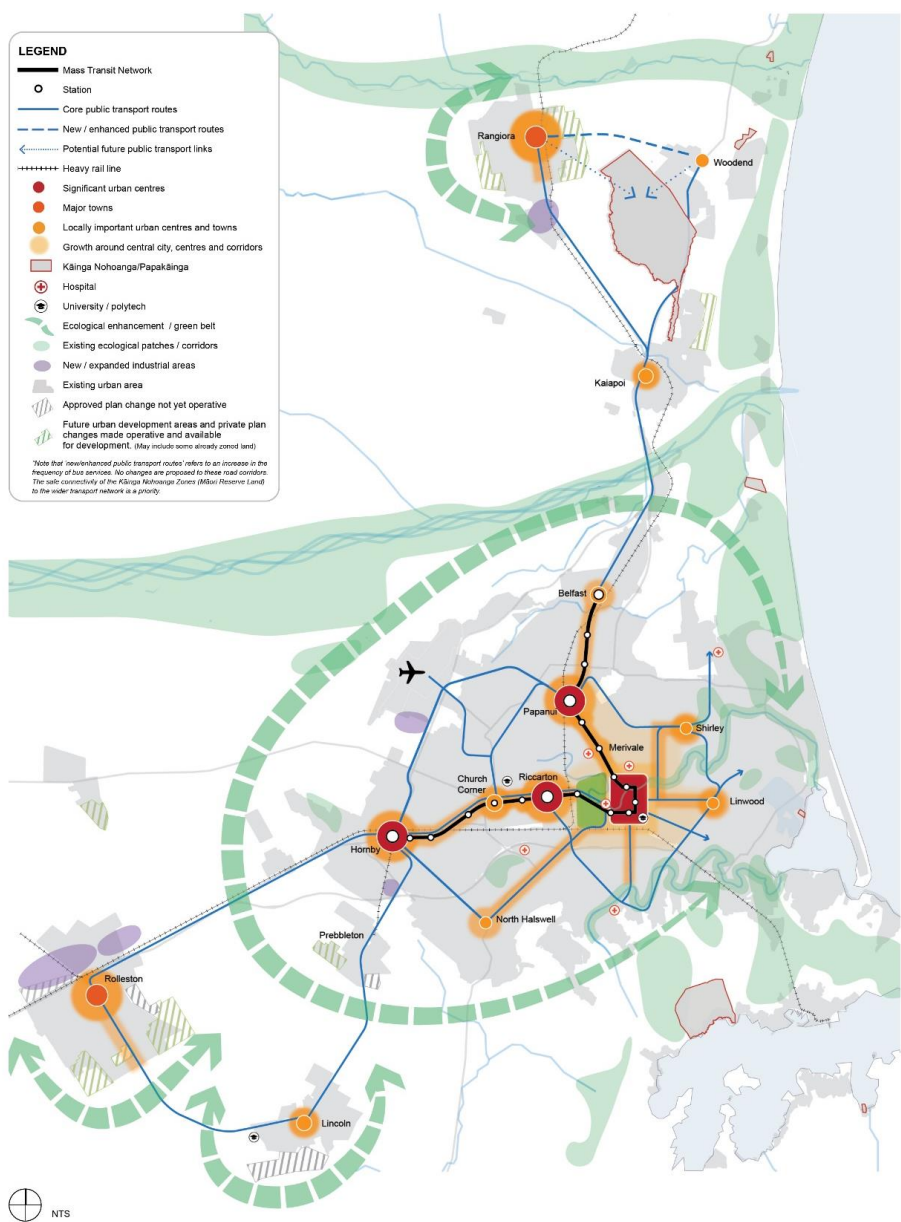
With good large scale urban planning, intensifying existing areas and decreasing car centrality can free up more urban space that can be used for green spaces, public parks, and nature reserves, which can allow for increased number of trees/plants. There should be nothing to prevent trees/green spaces near taller buildings. More people should have access to high quality shared green spaces/parks, instead of private backyards.



Support of the concept of a Greenbelt around our urban areas

I support the concept of a Greenbelt around our urban areas, both to protect productive rural soils/farmlands, but also for the prevention of new greenfield suburban sprawl. However, where the proposed greenbelt is still allows for too much greenfield development within its boundaries.

700,000 - 1MILLION PEOPLE



Partial support for the approach to focus on these areas

I heavily support the intensification of all existing areas within Christchurch, especially along main public transit/mass rapid transit corridors.

I support public-private partnerships when implemented through a community lead development cooperative approach. The cooperative approach can provide fair and affordable to the masses, as well as disincentivize private corporations making excess profits.

I heavily oppose allowing almost all greenfield suburban sprawl, including around the surrounding areas of Rangiora and Rolleston.

Most of Greater Christchurch is unwalkable, due to its low-density suburban design, and allowing for more greenfield sprawl only makes it worse. Since the widespread adoption of personal automobiles in the mid-20th century the city has been designed around cars. Quality public transportation, density, and well-designed urban areas are limited to non-existent in most of the city. These poor planning decisions have negatively impacted residents, the local economy, and environment.

On average personal transport usage (car usage) in low density areas is 3.7 times higher than in higher density areas. This also means 3.7 times more vehicle emission. People are forced to travel further distances to get to places. More driving, more greenhouse gas emissions which are a major contributing factor to climate change [37].

In Low density suburbs distances are too far for people to walk, so most people are forced to drive. This is often made worse by euclidean/single use zoning typically found in low density suburbs. Not only is this bad for the environment, but also the economy and society.

It is difficult to provide quality public transit in low density suburban areas, as it is hard to provide ample coverage, as well as make the route economically sustainable [38]. Public transit that is not within walking distance is often considered unattractive by residents, and they chose to drive instead [39][40].

A 2015 report found that the average New Zealand commuter pays \$11,852.98 per annum in car ownership and running costs. This is a substantial amount of the average annual income. However, commuters who did not own a car and used public transportation to commute spent on average \$1,879.32 for transportation costs (saving of \$9,065.78). Car owners that used public transportation to only commute to work spent on average \$9,733.95 for transportation costs [41]. Car transportation costs have likely increased since, and people living in further out from the Christchurch, such as in Rangiora and Rolleston will likely travel more by car. Car ownership and usage is extremely expensive. People need access to quality public transportation, but also the ability to live car-free in an urban/suburban environment. This is very important during a cost-of-living crisis, but also for improved long-term economic stability.

Since people living in low density car dependent areas drive more, they have transportation costs as they spend more on fuel and other car running costs. However, more money is also spent on roading infrastructure, parking, and road maintenance. There is also an economic loss from increased traffic congestion, crashes, and environmental impacts [42].

People living in low-density, single-zoned, and car dependent areas typically have low levels of physical activity, often below recommended levels. Since walking to destinations is unfeasible, and driving is the only option. This is linked to higher rates of obesity, and other health problems. Those in denser, more walkable areas mixed-use areas, with good access to public transport have higher and healthier rates of Physical Activity [34].

Car dependency strips the independent mobility of those who cannot drive. This often affects the elderly, people with certain disabilities, adolescents too young to legally drive, those who can afford to drive, people without access to a car and those who simply choose not to drive. Without access to walkable areas and public transport these people are forced to rely on others who can drive, which is often costly and not always feasible. People without independent mobility often unwillingly have sedentary lifestyles, as well as higher rates of loneliness, depression, obesity, and less of a sense of community [43][44][45][46]

Creating more greenfield car-dependent suburbs increases car traffic and congestion across area [47]. However, attempting to decrease congestion by expanding and widening the roading network leads to induced demand, meaning that overtime car usage will increase, and traffic congestion will become even worse [48][49].

Low density areas have higher supporting infrastructure costs than denser areas, especially for long term maintenance and replacements. These costs put stress on both local councils and government. Rates are often increased, as well as more tax money is spent attempt to fix these problems. Sprawling low density is often deemed economically unsustainable [50][51].

Low density car dependent sprawl areas also negatively impact stress, productivity, and the rate of innovation, as people are spending more time commuting and higher amounts on transportation costs, leading to less free time and disposable income [52][53][54][55].

Greenfield property should not be allowed to have influence in the development of Greater Christchurch, as their long track record of personal greed for profit, over the longer-term wellbeing of residents and the environment is unsuitable for a sustainable future for the region.

I would support the intensification existing areas of Rangiora and Rolleston, however a passenger rail transit connection and intensification through transit-oriented development will be highly preferable to prevent car dependency. However, if no rail transit connection is provided, other areas of Christchurch should be prioritized.



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Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 19/07/2023

First name: David **Last name:** Lawry

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

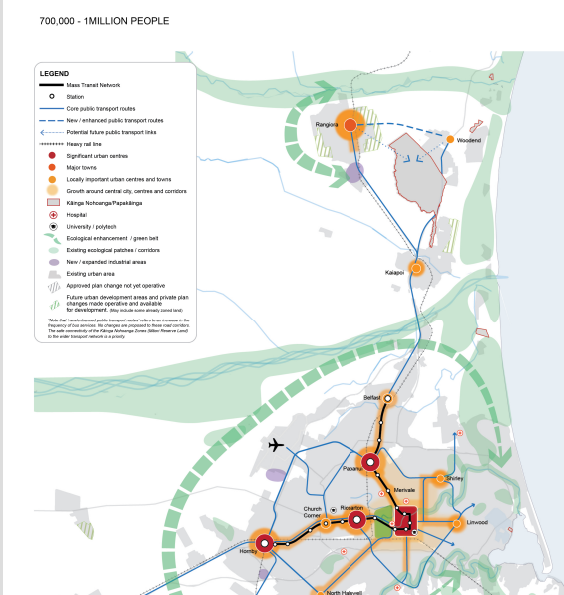
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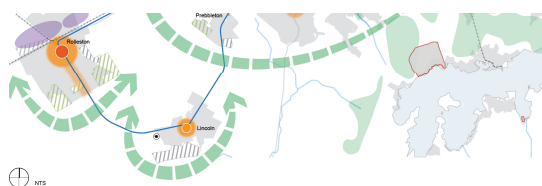
Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

No

Why:

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

No

Why:

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

- Offer opportunities for accelerated and/or significant development;
- Are complex, in that successfully developing at the required pace and scale requires working in partnership i.e. Business as usual delivery will not be sufficient; and
- Are in key locations where successful development gives effect to the draft Spatial Plan.

The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area to adapt to the impacts of climate change and to strengthen resilience.

1.5 Do you agree with the approach to focus on these areas?

Partially

Why (please specify the Priority Area):

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

The airport air noise contour specifically the 50 dBA Ldn contour provided to Christchurch International Airport (CIAL) by its owner Christchurch City Council (CCC) is unique. It provides a significant competitive advantage to CIAL.

CIAL earns more from property management and development than its aviation business.

CIAL is losing very significant aviation air movements especially to Auckland Airport and international airports. Especially on the Queenstown routes. CCC have been provided with the evidence. CIAL has recently raised in excess of \$300 million on the NZFX bond market. It has announced that it intends to build a new airport at Tarras and continues to buy land at Tarras presumably with the approval of the CCC CEO. Information obtained indicates that CIAL still has insufficient land to build a wide bodied capable runway. A major international runway building company has indicated that the runway alone at Tarras would cost in the order of 1 Billion \$NZ. The question therefore is how is this new airport to be funded and what will the impact of that huge debt raising be on the rate payers of Christchurch. The clear intention is to pull travellers away from Christchurch

CCC has allowed CIAL to very significantly reduce the annual dividend in the order of \$30million a year down to around \$5million. How long are the rate payers going to incur this income loss while CIAL seeks to move to Tarras?

The air noise contours act to provide CIAL noise complaint risk protection assessed at the maximum capacity of the runways which has recently been assessed by ECAN at 220,000 air movements an increase from the previous 176,000 agreed capacity. Yet CIAL have less than 70,000 air movements per year and as stated is losing market share. There is no prospect at all of the capacity ever being reached.

One elephant in the room is that the entire matter of noise complaint risk could be removed by land owners contracting out of making noise complaints. An objective assessment of this option has never been independently undertaken.

Why does CCC continue to support an extreme residential land use avoidance regime when the alleged risk from noise complaints, that it is alleged could result in a curfew is simply dishonest. There is no such risk CCC noise control offices do not even investigate airport related noise complaints, delegating them back to its company.

This competitive advantage has had the effect of pushing residential development away from Christchurch with a very significant ongoing rating opportunity cost loss.

All for a company that intends to move its operation to Tarras. There are very significant resource consent risks, simply astronomical costs which will guarantee that the rate payers will gain no benefit from CIAL and indeed that CCC could well be financially at risk. While it is alleged that funding is already ensured the question should be asked is it from China. Additionally the instigator of the entire Tarras plan CIAL's previous CEO has left the company.

Turning back from the facts to the special plan. If the air noise contours specifically the 50 dBA Ldn air noise contour is not removed then the adverse impact on CCC's ability to provide the needed growth is put at significant risk. Literally thousands of hectares are impacted. If the land impacted by sea rise, climate related flooding, and liquefaction risk are removed from current land allegedly available for residential development then it quickly becomes apparent that there is indeed a lack of land earmarked for the needed growth.

The problems remains that conflict of interest agendas are adversary impacting on this process.

ECAN are currently overseeing a re-evaluation the air noise contours, the validity of the 50 dBA Ldn air noise contour will then be tested.

CIAL have driven a huge amount of litigation around air noise contours and other advantages. Regardless of legal structures used by CCC to try and remove itself from conflicts their " no surprises requirement " of the Holdings Corporation and recent need to address a number of ethical issues makes it very clear that the responsibility and power to address the conflicts of interest and competitive advantages being enjoyed by CIAL sits with the CCC CEO.

The question is will that CEO support the removal of the 50 dBA Ldn air noise contour in the ECAN process or be complicit in its retention.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 09/07/2023

First name: Cameron **Last name:** Bradley

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

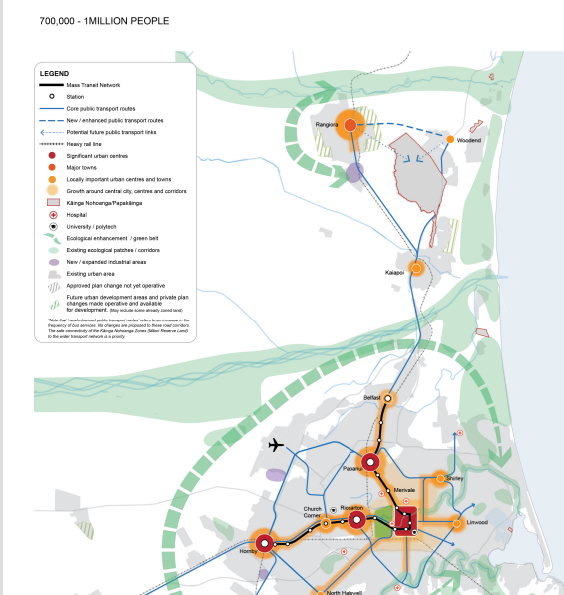
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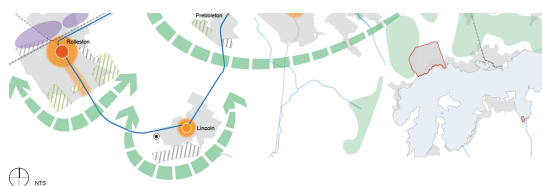
Feedback

The Huihui Mai engagement revealed 86% support for concentrating future growth around urban centres and along public transport corridors (see map below). This is a key direction of the draft Spatial Plan, and we'd like to hear your response to the following aspects of that direction.

The draft Spatial Plan concentrates growth around urban centres and along public transport corridors. An improved and more effective public transport system is needed to provide alternatives to private vehicles and to reduce carbon emissions.

(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

Over the last several decades we have not done enough to ensure our people can legitimately get the things they need and to the places they need with sustainable travel choices. I am ashamed to say that even in the past five or so years, when climate change has been acknowledged as a critical issue for the future of our people, we still have made amazingly little progress to reduce our dependence on cars and fossil fuels. We have a lot of catching up to do and progressing this as quickly as possible is a good start.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

Our lack of sustainable transport options and car dependence is intrinsically linked to the way we have built our city. By providing almost solely low density housing options on the peripheral of our city for decades we now have a geographically huge city which is difficult to service with public transport, shops, schools, utilities and everything else we need in our day to day lives. By increasing density in already developed areas we will reduce the amount of land we need and increase how efficient we are.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

We have treated the environment as secondary for far too long and we should turn this around for our children.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

We have taken so much already so let's really think about whether we need more.

Priority Development Areas provide a mechanism for coordinated and focused action across multiple agencies to inform, prioritise and unlock public and private sector investment. They are a key tool within the draft Spatial Plan to accelerate development in locations that will support the desired pattern of growth and/or facilitate adaptation and regeneration. Priority Areas have been developed as part of other Urban Growth Partnership Spatial Plans across New Zealand, and typically:

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The following Priority Development Areas have been identified in the plan: Rangiora Town Centre and surrounds; Rolleston Town Centre and surrounds; Papanui; Central City; Riccarton; and Hornby. Eastern Christchurch is included as a priority area, recognising the need for a partnership approach to support this area

to adapt to the impacts of climate change and to strengthen resilience.

1.5 Do you agree with the approach to focus on these areas?

Partially

Why (please specify the Priority Area):

I agree with brownfield priority development areas. I strongly disagree with any new development in Rangiora, Rolleston, or other areas around the fringes of Christchurch.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Partially

Why:

I believe it should be stronger on the changes in density and transport habits provided. i.e. make it obvious that we cannot all continue living in stand-alone, single story, single family homes, and driving where we need to go all the time.

Attached Documents

File
No records to display.

Greater Christchurch Spatial Plan

Submitter Details

Submission Date: 23/07/2023

First name: Fiona **Last name:** Bennetts

Your role in the organisation and the number of people your organisation represents:

Would you like to speak to your submission?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

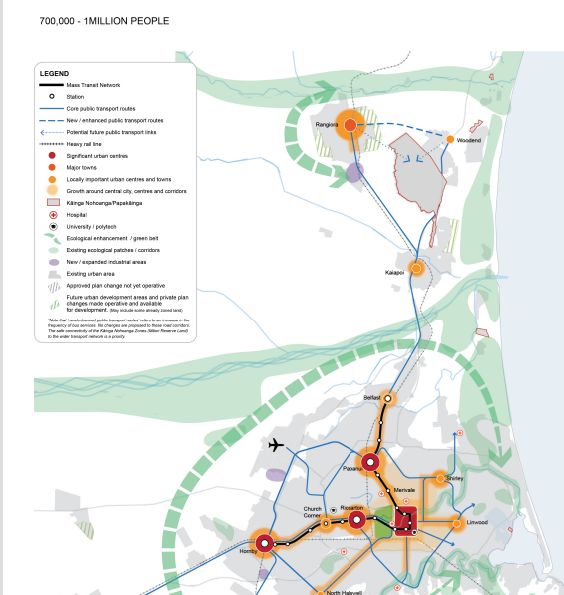
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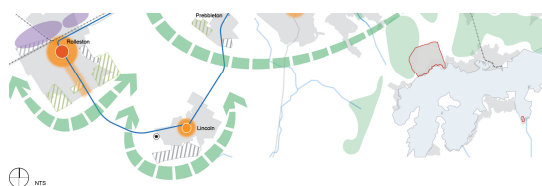
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(Click on the map to view it in a new window)





1

Do you support the improved public transport system proposed in the draft Spatial Plan?

Yes

Why:

As a starting point, the public transport system proposed makes complete sense. We will, however, need to expand to other areas/corridors.

Concentrating future housing development around urban centres and along public transport corridors will enable a greater choice of housing to be developed, including more affordable options such as apartments and terraced housing.

1.2 Do you agree that we should focus future development and investment around urban centres and transport corridors?

Yes

Why:

I envisage a future where people live car-free. They can walk, bike, scoot, or bus where they need to go over 90% of the time. Other times, they can car-pool with friends, share an uber/taxi/etc., or they could hire an electric car. High density living supports high-frequency public transport, and vice versa.

The natural environment is integral to quality of life in Greater Christchurch. Focusing growth around urban centres will help to protect areas with significant natural values, and can improve the health of waterways, maintain highly productive land and expand the network of green spaces for relaxation and recreation. This is referred to in the draft Spatial Plan as the blue-green network.

1.3 Do you support the proposed strategy to maintain and enhance the natural environment within our urban areas?

Yes

Why:

We need to live in harmony with the natural world - we are part of the ecosystem, not above it. That means we need trees, grasslands, wetlands, and rivers to thrive and have the space they need to change with the weather including flooding. We need to re-wild some parts of Christchurch, and not keep building out further and further away from the central city, losing productive soils in the process. We need dense living, with lots of parks, stormwater retention basins, and other amenities. We need sunlight and plants and birds and bees and gardens. We must learn from the mistakes and successes in other cities and not fall into the same traps (too late, in some places, e.g. Bexley). We need to honour Te Tiriti o Waitangi and the natural world.

One aspect of the blue-green network approach is to maintain green space to act as a buffer between urban and rural areas, known as a Greenbelt. This has multiple benefits and could include a range of different uses and activities including protection of nature, rural production and recreation.

1.4 Do you support the concept of a Greenbelt around our urban areas?

Yes

Why:

Fully support this concept. We need to let nature thrive, and not let humans alter every hectare of this earth we share.

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1.5 Do you agree with the approach to focus on these areas?

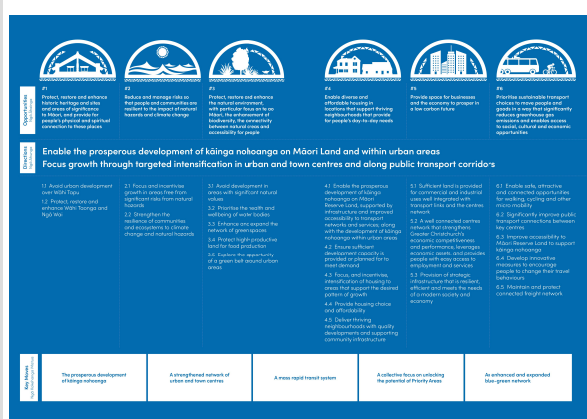
Yes

Why (please specify the Priority Area):

Glad to hear Eastern Christchurch is also included as a priority area. Perhaps Merivale, St Albans, Edgeware, Richmond, Linwood, Phillipstown, Waltham, Sydenham and Addington could also be added as CBD-adjacent areas that would benefit from this coordinated effort.

The draft plan proposes six opportunities, which link to a set of clear directions and key moves to help shape the future of Greater Christchurch. The spatial strategy is detailed in the table below.

(Click the image to open it in another window)



1.6 Do you agree with the draft spatial strategy outlined above?

Yes

Why:

Love it!

1.7 Do you have any feedback on other aspects of the Draft Spatial Plan?

Change is hard, and a lot of people who drive everywhere simply cannot see another way of moving about. We need to show them that public and active transport are the future of transport, and that cars are a luxury but not a right or necessity of life. We are a small city, but we are growing rapidly. Lots of small cities do amazing things with walking and cycling networks as well as public transport and some space for private vehicles. Change is inevitable. The current way of living (low density, urban sprawl, car-centric road) is not sustainable in any city in the world in these Climate and Biodiversity crises. We must change how we live. no-one is exempt.

Attached Documents

File

No records to display.

6. Consideration and Deliberation Ngā Whaiwhakaaro me Ngā Taukume o Ngā Kōrero

This item provides an opportunity for Members to consider and deliberate the written and verbal submissions received and additional information provided by submitters.