

# Greater Christchurch Partnership Comment on the Faringdon South West and South East Development

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

<b>Organisation name (if relevant)</b>	Greater Christchurch Partnership
<b>*First name</b>	Anna
<b>*Last name</b>	Elphick

**\*Email** (a valid email address enables us to communicate efficiently with you)

[secretariat@greaterchristchurch.org.nz](mailto:secretariat@greaterchristchurch.org.nz)

## 2. \*We will email you draft conditions of consent for your comment about this application

<input checked="" type="checkbox"/> X	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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## 3. Please provide your comments on this application

### Introductory comments

1. The Greater Christchurch Partnership (the Partnership) thanks the Expert Consenting Panel for the opportunity to provide comment on the application – Faringdon South West and South East Development.
2. Please note that you will separately receive comments from the Christchurch City Council, Selwyn District Council, Te Rūnanga o Ngāi Tahu and Environment Canterbury who are aligned in, and support, the comments made herein.
3. The Partnership is supportive of increasing the housing supply within the Greater Christchurch area in appropriate locations and is committed to providing affordable housing opportunities for Greater Christchurch.

4. Through working collaboratively together, the Partnership have developed a shared and consistent view of the future urban form for Greater Christchurch.
5. The Partnership is supportive of this application on the basis that it is consistent with policy direction in the CRPS and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch.

### **Strategic planning context**

6. *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga* (Our Space 2018-2048) was endorsed by the Partnership in June 2019 and subsequently adopted by each partner Council. It is the future development strategy for Greater Christchurch developed under the National Policy Statement on Urban Development Capacity (NPS-UDC).
7. Our Space 2018-2048 updates the settlement pattern originally set out in the Greater Christchurch Urban Development Strategy (UDS) from 2007 and underpins the planning framework outlined in Chapter 6 to the Canterbury Regional Policy Statement, inserted through a statutory direction as part of the Land Use Recovery Plan. Our Space 2018-2048 identifies sufficient development capacity to meet anticipated housing needs over a thirty year planning horizon out to 2048.
8. A significant amount of housing development capacity is already enabled by the CRPS. Our Space 2018-2048 indicates there is existing capacity for nearly 74,000 dwellings in Greater Christchurch, against a housing target of 86,600 (including the additional margins that were required by the NPS-UDC), between 2018 to 2048. However as part of this work, the Housing Capacity Assessment 2018 identified a capacity shortfall in the Selwyn and Waimakariri Districts. The capacity assessment also highlighted the provision of smaller, more affordable housing with a range of housing typologies and tenures as being the greatest gap in the Greater Christchurch housing market.
9. Our Space set out a proposed approach to meet the projected shortfall, which included intensification in existing urban areas and the identification of new greenfield areas for urban housing (termed Future Development Areas (FDAs)) in Rolleston, Rangiora and Kaiapoi. These locations have been identified in long-term growth strategies since 2007 and signalled by the Projected Infrastructure Boundary on Map A in Chapter 6 of the CRPS.
10. This matter has been advanced through a Proposed Change to the CRPS. Following the use of a streamlined planning process under the RMA, the Proposed Change was approved by the Minister for the Environment on 28 May 2021. At the Canterbury Regional Council meeting on 8 July 2021 it was resolved to publicly notify this decision and that these changes become operative on 28 July in accordance with clause 20 of Schedule 1 of the RMA.
11. Density scenarios indicate that, at a minimum density of at least 12 households per hectare, the FDAs could collectively provide for over 10,000 homes.

### **Faringdon South West and South East Development**

12. The development site is located inside the projected infrastructure boundary (PIB) shown on Map A in Chapter 6 of the CRPS and is part of the Future Development Area (FDA) in Rolleston identified in Our Space 2018-2048.
13. The Partnership is supportive of this application on the basis that it is consistent with policy direction in the CRPS and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch.

***Specific comments about the proposed development density (12 households per hectare)***

14. Whilst 12 hh/ha is consistent with the minimum densities specified in the CRPS and the direction provided in the future development strategy, one of the actions arising from Our Space 2018-2048 was to undertake an evaluation of the appropriateness of existing minimum densities specified in the CRPS, including whether any changes to minimum densities is likely to be desirable and achievable across FDAs in the Selwyn and Waimakariri districts.
15. The key finding of the Independent ['Greenfield' Density Analysis Report 2020](#) commissioned by the Partnership is that a minimum density of 15 households per hectare (hh/ha) is 'optimal' in terms of greenfield land development and there are benefits to doing this. However, there are a number of identified constraints and issues raised in the review that need to be overcome to ensure that development at this density occurs in an effective way.
16. The application provides for 12hh/ha but it is not clear what assessment/consideration has been given in determining why this is more feasible or desirable than 15hh/ha, as indicated in the 'Greenfield' Density Analysis Report 2020. It may be that 12hh/ha is optimal in this location and at this time but an assessment as to why this may be the case would be beneficial.
17. The Greater Christchurch Partnership is also currently progressing a business case to investigate future mass rapid transport routes and modes. A key consideration regarding the feasibility for such investment will be the catchment population along chosen routes. This reinforces the need to maximise population densities in new development which might benefit from such investment.