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**SUBMISSION ON CHRISTCHURCH REPLACEMENT DISTRICT PLAN (RESIDENTIAL  
MEDIUM DENSITY ZONING)**

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1 **TO:**

**Christchurch City Council**

Strategy and Planning

P O Box 73012

Christchurch 8154

Via Email: [dpreview@ccc.govt.nz](mailto:dpreview@ccc.govt.nz)



2 **FROM:**

**Housing New Zealand Corporation**

C/- Greenwood Roche

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Christchurch 8140

Attention: Lauren Semple/Hannah Marks

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3 **TRADE COMPETITION**

- 3.1 The submitter could not gain an advantage in trade competition through this submission.

4 **HEARING**

- 4.1 The submitter does wish to be heard.
- 4.2 The submitter will consider presenting a joint case with other submitters at hearing.

5 **AREA**

- 5.1 The submission relates to all areas notified.

## 6 THE SUBMISSION

### Background

- 6.1 Housing New Zealand Corporation ("Housing New Zealand") is the largest residential landowner in Christchurch, managing approximately 6,100 residential units and over 300 hectares of land. Housing New Zealand has recently completed an extensive residential repair programme and is redeveloping some of its existing landholdings to make optimal use of its resources to provide more warm, dry and safe homes that are better matched to current and future social housing demand. Housing New Zealand is concerned to ensure that sufficient areas of Residential Medium Density zoned land are available to enable housing capacity and choice.

### Scope of Submission

- 6.2 This submission relates to the proposal for Residential Medium Density zoning ("**RMD zoning**") of land around the following key activity centres:

- a) Papanui
- b) Linwood
- c) Hornby

including all associated provisions, planning maps and overlays ("**the Proposal**").

### Nature of the Submission

- 6.3 Housing New Zealand supports the Proposal to the extent that:
- a) it provides for additional housing capacity and increases housing choice, including social and affordable housing opportunities;
  - b) the areas proposed for RMD zoning are consistent with Policy 14.1.1.2 confirmed in the Stage 1 Residential Decision; and
  - c) it will assist redevelopment of Housing New Zealand property to meet future social and affordable housing demands.

6.4 Housing New Zealand opposes the Proposal to the extent that:

- a) the application of the Residential Medium Density Lower Height Limit Overlay to the RMD zoning is unnecessary and will significantly limit additional intensification opportunities; and
- b) the section 32 report is deficient in regard to:
  - analysis of the potential housing capacity or yield of the proposed RMD zoning;
  - whether the proposed boundaries incorporate the full extent of suitable land near the Hornby, Papanui and Linwood Key Activity Centres; and
  - the costs and benefits of imposing the Residential Medium Density Lower Height Limit Overlay.

*Support for RMD Zoning*

- 6.5 Housing New Zealand supports the additional RMD zoning in the Proposal. The proposed zoning will provide additional housing capacity and increase housing choice, including social and affordable housing opportunities. This will contribute to the achievement of Strategic Objectives 3.3.1(a), 3.3.4 and 3.3.7. It will assist in meeting the intensification targets in the LURP and RPS, and the requirements of clauses (d) and (e) of the Statement of Expectations.
- 6.6 The locations identified for RMD zoning are consistent with the requirements of Strategic Objective 3.3.7(d) and Policy 14.1.1.2 in the Stage 1 Residential Decision. The proposed locations are close to Key Activity Centres and provide for access to key amenities. They avoid areas of infrastructure constraints and significant environmental constraints, such as high hazard areas.
- 6.7 Housing New Zealand specifically supports the proposal for extensions to the RMD zones around the Key Activity Centres of Linwood and Hornby, particularly the extension of the RMD zone at Linwood to the east of Eastgate Mall, where Housing New Zealand has considerable landholdings. The extension of the RMD zone will assist redevelopment of Housing New Zealand property to meet future social and affordable housing demands, including demand for smaller units, in a way that provides for higher standards of efficiency, accessibility, safety, and comfort for occupants.
- 6.8 Housing New Zealand's redevelopment programme in some parts of Christchurch is currently constrained by unresolved infrastructure problems. The areas included in the Proposal are not subject to any known significant infrastructure constraints, and therefore provide increased opportunities for Housing New Zealand to deliver its redevelopment programme.

*Residential Medium Density Lower Height Limit Overlay*

- 6.9 Housing New Zealand opposes the application of the Residential Medium Density Lower Height Limit Overlay to the locations within the Proposal. This overlay restricts the permitted maximum height to 8 metres rather than 11 metres which applies in most other RMD zones in the Replacement Plan. The overlay significantly reduces the potential housing capacity or yield that could be provided in these areas. For example it would preclude development of viable small-scale apartment buildings.
- 6.10 Housing New Zealand considers that the height limitation will not adequately give effect to the intent of the Stage 1 Residential Decision in regard to providing for additional intensification opportunities, and that it will also inappropriately restrict choice of housing type. The height restriction is not clearly justified in the section 32 report, as further discussed below.

*Section 32 Report*

- 6.11 The section 32 report does not include any clear justification for imposing the Residential Medium Density Lower Height Limit Overlay to the areas notified in the Proposal. Comment in the section 32 report that application of the overlay is consistent with provision for use of the overlay in the Stage 1 Residential Decision is misleading. There are many areas of the RMD zone which are not subject to the lower height limit, and there is no analysis to suggest that the amenity of the areas included in the Proposal is such that a greater restriction is necessary.
- 6.12 There is no discussion in the section 32 report of any benefits to be obtained from imposing the Residential Medium Density Lower Height Limit Overlay, and no analysis of the impact on potential housing capacity or yield.
- 6.13 The section 32 report also does not provide any quantitative or qualitative analysis to indicate what housing capacity the additional zoning has the potential to accommodate. This makes it difficult to assess whether the extent of the proposed additional RMD zoning is adequate to meaningfully contribute to meeting the housing intensification targets set in the Canterbury Regional Policy Statement ("**RPS**").
- 6.14 There is a need for a robust analysis to confirm that the proposed zoning enables sufficient increased capacity for commercially feasible housing development opportunities to make a meaningful contribution to meeting intensification targets in the RPS. This needs to include analysis and consideration of the potential impact of the Residential Medium Density Lower Height Limit overlay on housing capacity.



6.15 Although the section 32 report assesses the suitability of the proposed areas for rezoning in terms of the requirements of Policy 14.1.1.2, the analysis does not include consideration of whether the suitable areas are limited to the defined boundaries. In the absence of this analysis and in light of the uncertainty about the capacity that will be provided by the proposed RMD zoning, Housing New Zealand considers there may be benefit in further extension of the proposed RMD zones. In particular Housing New Zealand has identified areas containing its property adjacent to the proposed Hornby and Linwood RMD zoning which it considers meet the requirements of Policy 14.1.1.2. In addition, Housing New Zealand considers there may be benefit of further extensions if landowners propose inclusion of additional areas that meet the requirements of Policy 14.1.1.2.

6.16 Without limiting the generality of the above, further specific reasons for Housing New Zealand's submission are set out in the table attached as **Schedule 1**.

6.17 The specific reasons for relief, as set out in **Schedule 1**, are summarised below.

#### **Reasons for the Submission**

6.18 The Replacement Plan must be in accordance with the statutory and regulatory framework that applies to Christchurch post-earthquake, as follows:

- a) be not inconsistent with the Recovery Strategy for Greater Christchurch Mahere Haumanutanga o Waitaha ("**Recovery Strategy**"), the Christchurch Central Recovery Plan Te Mahere Maraka Ōtautahi ("**CCRP**") or the Land Use Recovery Plan Te Mahere Whakahaumanu Tāone ("**LURP**") - refer sections 15 and 23 of the Canterbury Earthquake Recovery Act 2011 ("**CER Act**"), and clause 14 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ("**Order**");
- b) give effect to any national policy statement, the New Zealand Coastal Policy Statement ("**NZCPS**") and the RPS - refer section 75(3) of the Resource Management Act 1991 ("**RMA**");
- c) be not inconsistent with a regional plan - refer section 75(4)(b) of the RMA;
- d) have particular regard to the Statement of Expectations set out in Schedule 4 of the Order - refer clause 14(1)(d) of the Order;
- e) be supported by sound evidence and an appropriate level of analysis in accordance with section 32 of the RMA;
- f) be consistent with the objectives in the Strategic Directions Decision dated 26 February 2015.

- 6.19 Decision 10 of the Independent Hearings Panel ("**the Stage 1 Residential Decision**") dated 10 December 2015 also establishes the objective and policy framework for residential development, including extensions of Residential Medium Density zoning within the existing Christchurch urban area.

## **7 RELIEF SOUGHT**

- 7.1 Suggested relief to address the concerns in Housing New Zealand's submission is set out in **Schedule 1** and will be supplemented by evidence at the hearing.
- 7.2 It is however recognised that there may be other methods of relief that are able to address Housing New Zealand's concerns, and the suggested revisions in **Schedule 1** do not limit the generality of the reasons for Housing New Zealand's submission.
- 7.3 In summary Housing New Zealand seeks the following decisions:
- 7.4 **Make any necessary amendments to ensure the Proposal is in accordance with the statutory and regulatory framework, including amendments so that the Proposal:**
- a) is not inconsistent with the Recovery Strategy, CCRP and the LURP;
  - b) gives effect to the RPS;
  - c) has particular regard to the statement of expectations;
  - d) is informed by sound evidence and a robust analysis under section 32 of the RMA; and
  - e) implements the objectives in the Strategic Directions Decision.

7.5 To achieve **Housing New Zealand's** outcomes:

- a) retain the RMD zoning in the areas identified in the Proposal,
- b) extend the RMD zoning to include the additional land set out in Schedule 1, which is consistent with Policy 14.1.1.2;
- c) extend the RMD zoning to include additional land requested in any submissions by landowners, to the extent these areas are consistent with Policy 14.1.1.2;
- d) remove the application of the Residential Medium Density Lower Height Limit Overlay from the RMD zones in the Proposal;
- e) address the matters set out in the detailed submission table on the following pages;
- f) such other relief necessary to give effect to the relief sought in this submission;
- g) any additional or alternative relief that achieves the same or similar outcomes to the above,
- h) any consequential or ancillary changes as a result of the above.

**HOUSING NEW ZEALAND CORPORATION**

**Date:** 23 March 2016

**Signature:**

A handwritten signature in blue ink, appearing to read 'L J Semple', is written above a horizontal line.

**L J Semple (for the Submitter)**

# **SCHEDULE 1: DETAILED SUBMISSIONS AND RELIEF SOUGHT**

	Provision	Submission	Relief Sought
<b>Planning Maps</b>			
1	Planning Map 24 (Papanui)	<p>Support in part</p> <p>RMD zoning in these areas is consistent with the requirements of Policy 14.1.1.2 of the Stage 1 Residential Decision. It will provide for increased housing capacity, housing choice and opportunities to provide social and affordable housing and contribute to the achievement of Strategic Objectives 3.3.1(a), 3.3.4 and 3.3.7 and RPS Objective 6.2.2 and Policy 6.3.7.</p> <p>Imposition of the Residential Medium Density Lower Height Limit Overlay is unnecessary and will inappropriately limit housing capacity and choice of housing type in the proposed areas. Housing New Zealand considers that this will not give effect to the intent of the Stage 1 Residential Decision</p>	<p>a) Retain RMD zoning in the areas identified on Planning Map 24,</p> <p>b) Include additional areas requested by landowners if they meet the requirements of Policy 14.1.1.2, and</p> <p>c) Delete the Residential Medium Density Lower Height Limit Overlay from the areas identified on Planning Map 24.</p>
2	Planning Maps 32, 33, 39 and 40 (Linwood)	<p>Support in part</p> <p>RMD zoning in these areas is consistent with</p>	<p>a) Retain RMD zoning in the areas identified on Planning Maps 32, 33, 39 and 40,</p>



		<p>the requirements of Policy 14.1.1.2 of the Stage 1 Residential Decision. It will provide for increased housing capacity, housing choice and opportunities to provide social and affordable housing and contribute to the achievement of Strategic Objectives 3.3.1(a), 3.3.4 and 3.3.7 and RPS Objective 6.2.2 and Policy 6.3.7.</p> <p>Housing New Zealand supports the proposed extensions to the RMD zone around the Linwood Key Activity Centre. This will provide increased opportunities for Housing New Zealand to deliver its redevelopment programme to meet future social housing demands in suitable locations within 800m walkable distance of key amenities.</p> <p>The RMD zone extension east of Eastgate Mall at Linwood presents a significant opportunity for the comprehensive redevelopment of social housing at medium densities given the configuration of the existing Housing New Zealand landholding in multiple adjoining titles, and the location near to key supporting services and public transport. Potential redevelopment of this area facilitated by the</p>	<p>b) Include the properties at 75, 77, 77A, B, &amp; C, and 79 Mackworth Street, Linwood in the RMD zone; and</p> <p>c) Include additional areas requested by landowners if they meet the requirements of Policy 14.1.1.2, and</p> <p>d) Delete the Residential Medium Density Lower Height Limit Overlay from the areas identified on Planning Maps 32, 33, 39 and 40.</p>
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		<p>extension of the RMD zone would assist in meeting future social housing demands, including demand for smaller units, which meet higher standards of efficiency, accessibility, safety, and comfort for occupants.</p> <p>Imposition of the Residential Medium Density Lower Height Limit Overlay is unnecessary and will inappropriately limit housing capacity and housing choice in the proposed areas. Housing New Zealand considers that this will not give effect to the intent of the Stage 1 Residential Decision.</p>	
3	Planning Maps 36 and 37 (Hornby)	<p>RMD zoning in these areas is consistent with the requirements of Policy 14.1.1.2 of the Stage 1 Residential Decision. It will provide for increased housing capacity, housing choice and opportunities to provide social and affordable housing and contribute to the achievement of Strategic Objectives 3.3.1(a), 3.3.4 and 3.3.7 and RPS Objective 6.2.2 and Policy 6.3.7.</p> <p>Housing New Zealand supports the proposed extensions to the RMD zone around the Hornby Key Activity Centre. This will provide</p>	<p>a) Retain RMD zoning in the areas identified on Planning Maps 36 and 37,</p> <p>b) Include the properties at 23, 25, 27, and 29 Amuri Street, and 24, 26, 28, 30, 32, 34, 34A, 36, 38, 40, 42, 44, 46, 48, 50, 50A, and 52 Gilberthorpes Road, Hornby in the RMD zone; and</p> <p>c) Include additional areas requested by landowners if they meet the requirements of Policy 14.1.1.2, and</p>

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		<p>increased opportunities for Housing New Zealand to deliver its redevelopment programme to meet future social housing demands in suitable locations within 800m walkable distance of key amenities.</p> <p>Imposition of the Residential Medium Density Lower Height Limit Overlay is unnecessary and will inappropriately limit housing capacity and housing choice in the proposed areas. Housing New Zealand considers that this will not give effect to the intent of the Stage 1 Residential Decision.</p>	<p>d) Delete the Residential Medium Density Lower Height Limit Overlay from the areas identified on Planning Maps 36 and 37.</p>
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