

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Waimakariri District Plan

and: Hearing Stream 12D: Ōhoka rezoning request

and: **Carter Group Property Limited**
(Submitter 237)

and: **Rolleston Industrial Developments Limited**
(Submitter 160)

Summary of evidence of Greg Akehurst

Dated: 1 July 2024

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SUMMARY OF EVIDENCE OF GREG AKEHURST

- 1 My full name is Gregory Michael Akehurst.
- 2 I prepared a statement of evidence in support of the Submitters' rezoning request on 5 March 2024. This summary statement has two components. The first is a summary of my evidence in chief and the second, is a summary response to Mr Rodney Yeoman's evidence in chief. Due to a family bereavement, I did not have the opportunity to prepare a formal brief of rebuttal evidence.
- 3 My evidence in chief focused on three broad areas;
 - 3.1 Estimates of residential capacity provided to Waimakariri District Council by Formative by the Waimakariri Residential Capacity and Demand Model (*WGCM22*) as outlined in the evidence of Mr Yeoman.
 - 3.2 A reassessment of capacity utilising Statistics New Zealand's estimates at an SA2 level, recent building consents and Mr Sexton's evidence of on the ground supply. The focus of this assessment is the capacity and demand that falls within the Greater Christchurch Urban Environment (*GCUE*) but outside the three main Waimakariri Townships.
 - 3.3 The capacity delivered by the rezoning sought by the Submitters at Ōhoka.
- 4 I identified that the NPSUD requires local authorities to; '*at all times, provide at least sufficient development capacity to meet expected demands... over the short term, medium term and long term*' (Policy 2), and otherwise seeks competitive land and development markets (Objective 2) and have '*robust and frequently updated information... to inform planning decisions*' (Objective 7).
- 5 This means that within the urban environment of Greater Christchurch, Councils must ensure that the **minimum levels of capacity to meet demands are met**. Given that additional capacity can only be provided by way of District Plan Reviews or Plan Changes, it is imperative that more capacity than the minimum required should be provided as capacity is consumed constantly, to ensure that Policy 2 is met (at all times).
- 6 I agree with the evidence of Mr Phillips, when he states that '*the urban environment*' constitutes more than just the urban zoned land in Rangiora, Kaiapoi and Woodend/Pegasus as asserted in the Formative Report and Mr Yeoman's evidence. It includes those areas of the Waimakariri District within the GCUE, which includes the Ōhoka urban area and its surrounds.

- 7 I find that Waimakariri District is currently in deficit with respect to providing sufficient capacity within the GCUE to meet its obligation under the NPSUD.
- 8 I note that the most recent Formative Report contains the same information/values relied upon by Mr Yeoman in his evidence in chief provided for PC31. Therefore, this report does not take into account Mr Yeoman's own corrections made during the course of the PC31 hearing – let alone any capacity related corrections made by Mr Sexton as outlined in his evidence.
- 9 Analysis of the WCGM22 has highlighted a number of areas of concern. Notwithstanding that, by relying on Mr Yeoman's figures as outlined in the Formative Report, it is clear that there is a shortfall of capacity within the GCUE in areas outside the three identified townships (Rangiora, Kaiapoi and Woodend/Pegasus).
- 10 By my estimation, and relying on the Formative numbers, the shortfall in the short-medium term for those areas within the GCUE that sits outside the three main townships is approximately 524 dwellings. This shortfall is expected to increase to over 1,541 dwellings in the long term – unless additional capacity is identified.
- 11 Therefore, I find that the rezoning sought by the Submitters for Ōhoka provides an appropriate way to meet this shortfall in the medium term, and at least a portion in the longer term, noting:
- 11.1 Its contribution of approximately 850 dwellings to the sufficiency of housing capacity in the urban environment at a district and sub-district scale is 'significant'. This is a point that Mr Yeoman also agrees with;
- 11.2 Its establishment adjacent to an existing urban area and economies of scale and other benefits realised through the provision of infrastructure and dwellings for approximately 850 households in a single location has urban form and economic benefits, consistent with that sought by the NPSUD; and
- 11.3 The economic benefits of rezoning the land will outweigh any associated costs.
- 12 I find that, accounting for the above, on economic grounds, the rezoning relief sought by the Submitters is supported and is considered more appropriate than providing insufficient capacity in this part of the GCUE and/or dispersing such capacity in an ad hoc manner elsewhere.
- 13 By focusing solely on the townships of Rangiora, Kaiapoi and Woodend/Pegasus within the GCUE, and not considering demands that arise outside these locations, Waimakariri District Council has

failed to identify a market segment whose housing needs are not being met.

- 14 The rezoning sought by the Submitters will address this shortfall in capacity in a location of demand that is not the same as the three main townships. The approximately 850 dwellings envisaged in the rezoning request will cater for a significant proportion of the medium- and long-term shortfall within the GCUE, outside the main townships, in an efficient manner.
- 15 The rezoning will otherwise deliver a number of economic benefits and outcomes that, in my view, are consistent with the thrust of the NPSUD.
- 16 On this basis, I support the Submitters' requested relief on economic grounds.

Response to Evidence of Rodney Yeoman for Waimakariri District Council

- 17 Mr Yeoman reiterates his opinion that the Ōhoka urban area is not part of the urban environment, because it fails to pass both of the conjunctive elements of the NPSUD definition.
- 18 I disagree with this position and adopt the position of Mr Jeremy Philips (Planning), as laid out in his evidence, that Ohoka is or is intended to be of urban character. This along with the fact that Ōhoka is part of a labour market of 10,000 people qualifies it as an 'Urban Environment'.
- 19 In my opinion, Mr Yeoman's claims that having studied recent growth trends, the WCGM22 is conservative, are not relevant with respect to Ōhoka. This is because the WCGM22 fails to identify that residential demand growth that arises in non-township areas, most efficiently can be met in these non-township areas. The WCGM22 assumes all urban growth for the entire district is best siphoned into the three main townships.
- 20 This position is reinforced by the Statistics New Zealand growth projections. These are prepared at SA2 level. SA2's are defined to reflect communities that interact together socially and economically. Population and household estimates and projections are typically reported at SA2 levels. SA2 areas or a collection of SA2 areas are commonly used to define townships.
- 21 SA2 2023 is the first major update of the geography since the Statistical Standard for Geographic Areas 2018 (SSGA2018) was first introduced in 2018. The update is to ensure SA2s are relevant and meet criteria before each five-yearly population and dwelling census. Compared to SA2 2018, SA2 2023 contains 135 new SA2s (including Ōhoka, which was previously captured in the wider Mandeville/Ōhoka SA2 prior to the 2023 update). Updates were made to reflect real world change of population and dwelling growth

mainly in urban areas, and to make some improvements to their delineation of communities of interest.

- 22 Finally, I note that the panel for PC31 accepted that there was a *“very real likelihood that the [WCGM22] model has overstated residential capacity”*, and *“that irrespective of the outcome of this application the Council take steps to review the calculations provided by Formative and review realisability of the areas currently identified for future urban growth within the district.”* However, this recommendation has been ignored as none of the changes/corrections made during the PC31 hearing have been included, and the original capacity results have been republished in the December 2023 Formative Report. They are increasingly out of date in what is a fast growing district.
- 23 While during the PC31 hearing I presented my own assessment of demand, I have not used those results in my evidence in chief here. Therefore, I disagree with Mr Yeoman’s claim made in para 3.9, that *“Mr Akehurst has presented his own assessment of demand and supply (Figure 5 and Figure 6)”*. While I was critical of the methodology used in WCGM22, I have adopted the same projections used in the WCGM22 for this hearing, to estimate the amount of residential demand and capacity that sits within the GCUE, but outside the three main towns.
- 24 My analysis was based on SA2 2018 level dwelling projections from Formative’s spreadsheet entitled *“WDC Population Projections Data – Output.xlsx”*. This information was provided by Council staff in response to a request for medium/long term population and household projections.
- 25 Adjustments were made to the Formative results to convert the boundaries from SA2 2018 to 2023, which better aligns with current land use patterns and communities of interest. Additional adjustment was made to include Kaiapoi East SA2, which was omitted from the Formative spreadsheet.
- 26 However, I was unable to justify the difference between the aggregated results from the Formative Report and the Formative spreadsheet provided by Council. Which makes it extremely difficult to agree with outputs from the WCGM22 – irrespective of the locational issues.
- 27 The bulk of the remainder of Mr Yeoman’s evidence is simply a repeat of his Evidence in Chief for PC31. The reservations I expressed in that hearing – I still hold, given Mr Yeoman has made no changes to that evidence for this hearing.
- 28 In conclusion, I do not have confidence that either the operation of the WCGM22 delivers an appropriate assessment of sufficiency for WDC given that it fails to recognise that demand arising outside the three main townships can be met in locations outside the three main

townships and still contribute to a well-functioning urban environment.

- 29 Based on the matters that I have assessed in my evidence statements, including the relevant objectives and policies of the NPSUD, I support the Submitters' rezoning request from an economic perspective.

Dated: 1 July 2024

Greg Akehurst