

**IN THE MATTER OF**

**the Resource Management Act 1991**

**AND**

**IN THE MATTER OF**

Submissions and further submissions in relation to  
the proposed Waimakariri District Plan 12D Ōhoka  
Rezoning

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**Summary Statement of Evidence of Rodney George Yeoman**

**on behalf of Waimakariri District Council**

**(Economics)**

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## **1. INTRODUCTION**

- 1.1 The purpose of this summary statement is to set out the key points from my evidence in relation to the Applicant's Evidence on the Proposed District Plan, Hearing Stream 12D.
- 1.2 My full name is Rodney George Yeoman. My qualifications and experience and code of conduct is set out in my evidence which is attached as Appendix C to the s42A report and I do not repeat them in this summary statement.
- 1.3 My summary statement has predominantly been based on assessing the information presented in the evidence of Mr Akehurst, (economics), Ms Hampson (economics), Mr Sellars (market analysis), Mr Jones (real estate), and Mr Sexton (spatial analysis), Hearing Stream 12D. I have reviewed the supplementary evidence of Ms Hampson (economics), Mr Sellars (market analysis), Mr Jones (real estate), and Mr Sexton (spatial analysis), however I have not responded to that as part of this summary statement, in accordance with the instructions I have received.

## **2. ŌHOKA DEMAND FOR URBAN RESIDENTIAL LAND**

- 2.1 Broadly, the evidence from the submitter's experts suggests that Ōhoka is a high growth area and the proposed development could accommodate urban demand that would have located outside of the three main towns (Rangiora, Kaiapoi and Woodend). That the proposed development would not be a substitute for urban activity elsewhere in the Urban Environment.
- 2.2 I consider that Ōhoka is not a high growth area, relative to the other main towns in Waimakariri District. Also that Ōhoka is not generating demand for urban land, per se, rather that the urban areas (Rangiora, Woodend, and Kaiapoi, as well as Christchurch) are generating the demand. Therefore, the demand estimated by the submitters experts could be accommodated in the main urban areas (Rangiora, Woodend, and Kaiapoi), and that the submitter's proposal should be considered on its merits as compared to the other alternatives submitted in the Stream 12 hearings.
- 2.3 I consider that the proposed development in Ōhoka is not inherently different to what could be developed in the three main towns (Rangiora, Kaiapoi and Woodend). Therefore, it would likely draw demand away from these other urban areas. In relative terms I consider that this development would not contribute to a well-functioning urban environment.

## **3. ŌHOKA DEMAND FOR COMMERCIAL LAND**

- 3.1 The evidence from the submitter's experts suggests that if the proposed development in Ōhoka is approved then there would be a need for commercial land. The provision of a single Local Centre Zone (LCZ) in the proposed development and a commercial floorspace cap of 2,700sqm is agreed by all the experts.

3.2 As noted in my evidence, in my opinion, if the zone changes requested in the RIDL/CGPL submission were successful it would be better if some of the requested 2.2ha of LCZ land was used for a different purpose, such as additional residential zone. Allowing a LCZ of 1.2ha would easily accommodate the floorspace cap recommended by Ms Hampson, and allow the other 1.0ha to accommodate an additional 10-12 dwellings.

#### **4. URBAN RESIDENTIAL LAND SITUATION**

4.1 Broadly, the evidence from the submitter's experts suggests that there may be a potential shortfall in capacity within the NPS-UD framework, either in the three main towns (Rangiora, Kaiapoi and Woodend) or potentially in the areas outside the three main towns (area within the dotted line shown in Map A of the Canterbury Regional Policy Statement (CRPS)).

4.2 I still consider that the demand projections adopted in the WCGM22 are conservatively high. This because the Council has selected a high projection, which is unlikely to be achieved continuously over the short-medium (10 years) or long term (20 years). Also that there is a continuing trend towards attached dwellings which means that more of future growth is likely to be accommodated within the urban areas via redevelopment. Therefore, in my opinion the amount of demand in the future is likely to be lower than estimated in the WCGM22.

4.3 I also consider that the supply (capacity) estimation within the WCGM22 is conservatively low. I consider that both the redevelopment and greenfield estimates of capacity will likely be larger than estimated by the WCGM22. I have acknowledged in my evidence that there will be instances (at a parcel level) where capacity achieved is lower and higher than shown in the WCGM22, however on average I consider that the model underestimates capacity:

(a) The redevelopment achieved by the market within Rangiora, Kaiapoi and Woodend is likely to be higher than predicted in the WCGM22. Generally, more development becomes feasible as time passes which means that more redevelopment is likely to occur in the three main towns. The NPS-UD is prescriptive and does not allow capacity assessments to account for this natural phenomenon. This means that the WCGM22 can only include capacity that was feasible at the base year and not include capacity that becomes feasible over the following 10 years. In my opinion the WCGM22, by design and as required by NPS-UD, is likely to significantly underestimate redevelopment that will be achievable in the medium and long term.

(b) The greenfield development is likely to be higher than the assumed 15 dwellings per hectare which the submitters experts have adopted. I consider that the LUMS and recent developer intentions show that development is likely to exceed the capacity predicted in the WCGM22.

4.4 I consider that there is likely to be sufficient capacity in both the short-medium term (2023-2033) and long term (2033-2053) to meet expected dwelling demand within the three main

towns as a group (Rangiora, Kaiapoi, and Woodend). In my opinion the WCGM22 provides a conservative estimate of the sufficiency as required in the NPS-UD.

4.5 However, even if one adopts the submitters evidence (both in terms of Urban Environment definition, demand, and capacity estimation), then at worst there may be a shortfall of 512 dwellings in the short-medium term (2023-2033) and 1,541 dwellings in the long term (2033-2053).

4.6 I consider that this shortfall could be accommodated in the three main towns via the rezoning of alternatives proposed by submitters in Stream 12E hearing for, either Future Development Areas or new areas, and that those alternatives would provide more positive contributions to a well-functioning urban environment than the proposed Ōhoka development would.

## 5. CONCLUSION

5.1 I consider that Ōhoka is not generating demand for urban land, per se. Rather it is the urban areas (Rangiora, Woodend, and Kaiapoi, as well as Christchurch) that are generating the demand. Therefore, the demand identified by the submitter's experts could be accommodated in the main urban areas (Rangiora, Woodend, and Kaiapoi), and that the submitters proposal should be considered on its merits as compared to the other alternatives submitted in the Stream 12 hearings.

5.2 I consider that there is likely to be sufficient capacity in both the short-medium term (2023-2033) and long term (2033-2053) to meet expected dwelling demand within the three main towns as a group (Rangiora, Kaiapoi, and Woodend). In my opinion the WCGM22 provides a conservative estimate of the sufficiency as required in the NPS-UD.

5.3 While I disagree with the adoption of a wider definition of Urban Environment and the submitter's experts focus on the areas outside the three main towns, at worst if their sufficiency assessment is adopted then there may be a shortfall of 512 dwellings in the short-medium term (2023-2033) and 1,541 dwellings in the long term (2033-2053).

5.4 Even if the commissioners are of a mind to adopt the wider definition of Urban Environment and accepted the submitter's position that there is high demand for urban residential dwellings outside the three main towns, then in my opinion it would be beneficial to consider the range of options for accommodating that demand, which would include developments that are closer to the three main towns.

5.5 I agree with the PC31 commissioners, who considered that any potential shortfalls can be assessed via the current District Plan Review process. In the rezoning hearings Stream 12 the commissioners have been presented with a number of requests to rezone more residential land, and each will have different merits. This process will enable a weighing of alternatives, and could result in some requested rezonings being approved, either Future Development Areas or new areas.

5.6 For the purposes of the NPS-UD Policy 8, I still consider that RIDL/CGPL development

would allow a 'significant' number of dwellings, however in my opinion the zoning requested by RIDL/CGPL is not consistent with NPS-UD as it would not contribute to well-functioning urban environment.

- 5.7 I do not support the development of the site from an economic perspective, which is discussed in my evidence.

Rodney Yeoman

28 June 2024