



Memo

To: Andrew Willis, Development Planning Unit, Waimakariri District Council

From: Rodney Yeoman, Director

Date: 4 October 2024

Re: Stream 12D Ohoka Minute 40

The purpose of this memo is to provide information in relation to the commissioners' questions from Hearing Stream 12D, as set out in Minute 31 and repeated in Minute 40, as follows:

7. By way of background, Hearing Stream 12D was held on 1 to 3 July 2024, and, as is set out in our Minute 31, was adjourned to:
 - a. Address matters of capacity and demand that could only be addressed after the Council's economic evidence for Hearing Stream 12E was made publicly available;
 - b. Enable expert conferencing to occur and for the IHP to put any questions to experts having read the joint witness statements; and
 - c. Address the bespoke planning provisions proposed by Carter Group Property Ltd and Rolleston Industrial Developments Ltd, with respect to the land for which they had sought rezoning of.
8. In our Minute 33, we subsequently directed further expert conferencing to address cumulative effects in respect to wastewater, stormwater, and transportation arising from rezoning requests in Hearing Streams 12C and 12D. We also directed that the Council obtain legal advice in respect to matters relating to the interpretation of the NPS-UD, the CRPS and the PDP itself.
9. The sole purpose of the reconvened hearing on 4th November 2024 is to cover the three matters listed in paragraph 7 above, and the cumulative effects conferencing (as it applies to Hearing Stream 12D) and legal response as set out in paragraph 8 above.

I have been asked to address the matters of capacity and demand from Hearing Stream 12E which specifically relate to 7(a) of Minute 40.

Matters of Capacity Hearing Stream 12E

First, in terms of matters of capacity there were several submissions supporting the rezoning of land around Rangiora, Kaiapoi, and Woodend which would enable a considerable amount of additional development potential (see Figure 1). Broadly, in Hearing Stream 12E there was economic evidence



from the submitters and the Council which suggested that most of the proposed rezoning would be likely to produce positive economic outcomes.

In my evidence for the Hearing Stream 12E, I collated data for the rezoning submissions to provide an estimate of the additional potential capacity that is being proposed (Figure 7.1).¹ In total the rezoning submissions could accommodate an additional 4,097 dwellings in Rangiora, 2,146 dwellings in Kaiapoi, and 2,135 dwellings in Woodend in the short-medium term (2023-2033). This means total additional dwellings of 8,378 for the three towns, and if adopted the capacity would be significantly increased in the short-medium term (2023-2033) and the long term.² As noted in my evidence, I considered that from an economic perspective many of these developments would produce economic benefits that exceed the costs.

The s42A reporting officer recommended that most of the rezoning proposed be adopted. The officer concludes that “If accepted, my rezoning recommendations for rezoning as set out above live-zone an additional 6,901 to 9,915 houses in greenfield areas.”³ I have reviewed the s42A reporting officer’s summary table which shows the recommendations for each of the rezoning submissions.⁴

For this memo I have updated Figure 7.1 of my evidence from Hearing Stream 12E to include the s42A officer’s recommendation. The figure below shows that in total a capacity of 6,406 dwellings is recommended to be accepted. This is a sizable increase in capacity within the context of both the existing capacity proposed in the Proposed District Plan (PDP) and the demand that is expected in the short-medium term (2023-2033).

Also, I consider that my estimate of 6,406 is conservative as the development intensity that is achieved by the market is likely to increase in the coming ten years. I consider that development capacity that will be achieved by the market will fall within the range set out in Mr Wilson’s summary table (i.e. between 6,901 to 9,915), and most likely reach a point towards the midpoint of Mr Wilson’s range.

¹ Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. page 32.

² Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. Paragraph [7.1]-[7.6], page 31-33.

³ Wilson P, (July 2024) s42A Officer’s Report 12E, Paragraph [1105].

⁴ Wilson P, (July 2024) s42A Residential Rezoning Summary Table.



Figure 1: Hearing Stream 12E Rezoning Submissions Capacity and s42A Officer Recommendations

Submitter Proposals	Potential Capacity	s42A Officer Recommend
Rangiora		
Sparks FDA*	300	300 Accept
Bellgrove South FDA*	335	335 Accept
West Rangiora FDA**	1,265	1,265 Accept
South East Rangiora FDA**	594	594 Accept
North East Rangiora FDA**	635	635 Accept
Doncaster LLRZ*	105	- Contingent
North Rangiora LLRZ	395	395 Accept
Total Inside PIB	3,629	3,524
Hobson and Whimp*	140	- Reject
Sparks non-FDA*	300	300 Accept
Bellgrove South Non-FDA*	28	28 Accept
Total Outside PIB	468	328
Rangiora Submitters	4,097	3,852
Kaiapoi		
Momentum North Block FDA*	600	600 Accept
Momentum South Block FDA*	96	96 Accept
Suburban Estates Limited FDA**	554	554 Accept
Survus Consultants Ltd FDA**	669	669 Accept
Total Inside PIB	1,919	1,919
Mike Greer*	186	- Reject
Fusion Homes**	41	- Reject
Total Outside PIB	227	-
Kaiapoi Submitters	2,146	1,919
Woodend/Ravenswood		
Woodwater*	485	485 Accept***
Chinnery Road LLRZ**	150	150 Accept
Total Inside PIB	635	635
Stokes*	1,500	- Reject
Total Outside PIB	1,500	-
Woodend/Ravenswood Submitters	2,135	635
Total	8,378	6,406

* Proposed capacity stated in submitters evidence

**Yeoman 12E evidence

***There is a recommended staging rule, with 170 allowed until Woodend Bypass is constructed.

The capacity noted above is proposed by submitters and recommended by the s42 reporting officer in Hearing Stream 12E which is additional to the capacity in the existing zoned land in the Proposed District Plan. As noted in my Hearing Stream 12E evidence, there is capacity enabled in the PDP both via intensification of the existing urban area and remaining developable sites in the existing greenfield



areas (5,940 in the short-medium term).⁵ However that development activity has been more intense in greenfield areas⁶ and more intensification⁷ is being achieved than modelled in the most recent assessment (WCGM22). I concluded that the WCGM22 makes conservative assessments of the likely development density and dwelling yield in both greenfield and brownfield areas. Hence, that medium and long-term capacity shown in the assessment are likely to underestimate capacity as compared to what is being achieved by the market already.

Also, there is additional capacity recommended by s42A reporting officers in the other Hearing Streams (12A, and 12C), which would provide additional capacity via LLRZ, GRZ (Oxford), settlement, and other hamlets (rural subdivisions) of 798 dwellings which is set out in Hearing Stream 12E s42A report⁸ and Mr Wilson's summary table⁹. Additionally, the s42A reporting officers will provide right of replies that may result in changes to the recommendations and could result in additional capacity beyond what is noted in this memo.

Both the estimates of new additional capacity recommended in Hearing Stream 12E hearing (6,406) and the existing capacity from the PDP (5,940), are likely to be conservative. Therefore, if the commissioners accept the recommendations from the Hearing Stream 12E s42A officers report then short-medium term capacity within the urban areas of the three main towns would be at least 12,346 dwellings (2023-2033). The recommendations from Hearing Stream 12E council officer's report would result in capacity more than doubling in size compared to the PDP.

Matters of Demand Hearing Stream 12E

The demand for urban housing is forecast to be 4,970 dwellings over the short-medium term (2023-2033), which is based on the Statistics New Zealand High projection.¹⁰ This level of development activity is similar to the average observed over the last five years.

Under the PDP there was estimated to be more than sufficient capacity to meet expected demand, with sufficiency of +970 dwellings being available after the end of the short-medium term (i.e. 5,940 minus 4,970).

⁵ Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. Paragraph 2.27.

⁶ Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. Paragraph 2.32-2.51.

⁷ Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. Paragraph 2.51-2.63.

⁸ Wilson P, (July 2024) s42A Officer's Report 12E, Paragraph [1114].

⁹ Wilson P, (July 2024) s42A Residential Rezoning Summary Table.

¹⁰ Yeoman R, (July 2024) Statement of Evidence, Waimakariri District Plan 12E Rangiora, Kaiapoi, Woodend, Variation 1 Rezoning. Paragraph 2.15.



Under the PDP+12E recommendations, there is estimated to be more than sufficient capacity to meet expected demand, with sufficiency of +7,376 dwellings being available after the end of the short-medium term (i.e. 12,346 minus 4,970).

Figure 2: Rangiora, Kaiapoi, and Woodend Demand and Sufficiency Short-Medium term (2023-2033)

Rangiora, Kaiapoi, and Woodend residential land sufficiency	2023-2033 Short-Medium	
	PDP	PDP+12E Recom
Demand+Margin	4,970	4,970
Feasible Supply	5,940	12,346
Sufficiency	970	7,376

Relative to the expected demand for residential in the urban areas of the district, the recommendations from Hearing Stream 12E s42A council officer's report would enable sufficient capacity to accommodate all growth that is expected in the short-medium term, and beyond. The sufficiency in the main urban towns would increase towards the end of the long term.

Based on the PDP and the recommendations from Stream 12E s42A council officer's report, I consider that there would be very little risk of a shortage of capacity for urban development in the District in the short, medium or long term. The supply that would be enabled in Rangiora, Kaiapoi, and Woodend would be much larger than the demand for urban activity.