

Before an Independent Hearings Panel
appointed by the Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to the
proposed Waimakariri District Plan, Variation 1 and
Variation 2

and: Hearing Stream 10A: Future Development Areas,
Airport Noise Contour, Bird Strike and Growth policies

and: **Christchurch International Airport Limited**
Submitter 254

Statement of evidence of Gary Sellars (housing capacity)

Dated: 2 February 2024

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STATEMENT OF EVIDENCE OF GARY SELLARS

INTRODUCTION

- 1 My full name is Gary Russell Sellars.
- 2 I am a Consultant at Colliers Valuation (*Colliers*). I have been either a Director or Consultant at Colliers for 16 years. Prior to that, I was the Managing Director of Fright Aubrey, where I worked for 23 years.
- 3 I am a Registered Valuer, Fellow of the New Zealand Institute of Valuers and a Fellow of the Property Institute of New Zealand. I was registered in 1976 and have been in continuous practice as a Registered Valuer since that time, including four years employed by the Hong Kong Government. I have been involved in the public sector since 1985 in Christchurch in positions with Fright Aubrey and more recently Colliers. I specialise in commercial, industrial and land development valuation and consultancy within the Central Business District (CBD) and suburban locations of Christchurch and major metropolitan areas in the South Island. I complete research on Christchurch office vacancies on an annual basis and regularly complete research on Greater Christchurch residential land and industrial business land supply and take-up.
- 4 I have been involved in the valuation of a number of large residential subdivision developments during the last 35 years including Pegasus Town, Ravenswood, Wigram Skies, Te Whariki, Yaldhurst Park, Karamu, Prestons, Belfast Village and Bellgrove. I have during this period regularly prepared and presented expert evidence before various courts or tribunals in relation to zoning applications and arbitrations.

CODE OF CONDUCT

- 5 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with it in preparing my evidence on technical matters. I confirm that the technical matters on which I gave evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from my opinions expressed.

SCOPE OF EVIDENCE

- 6 I have been asked to comment on the relief sought by CIAL in relation to the proposed Waimakariri District Plan (*Proposed Plan*).

- 7 My evidence will address:
- 7.1 The housing capacity in the Greater Christchurch area to determine the availability of land for residential development, taking into account the impact that the Remodelled Christchurch International Airport 50 dBA Ldn Outer Envelope Air Noise Contour (*Remodelled Contour*) and the National Policy Statement for Highly Productive Land (*NPS-HPL*) will have on future housing capacity.
 - 7.2 The housing capacity in Waimakariri District in isolation taking into account the same parameters.
 - 7.3 The likely market impact of the Medium Density Residential Standards (*MDRS*) on the Waimakariri District.
- 8 In conclusion, Colliers' housing capacity assessment found that:
- 8.1 The impact of the Remodelled Contour on Greater Christchurch is extremely limited with a reduction in housing capacity of 276 households per hectare or 0.9%.
 - 8.2 The impact of the Remodelled Contour on Waimakariri District is more pronounced, with a reduction in housing capacity of 514 households per hectare or 9.0%. However, there are other areas in Waimakariri District (existing or potential) to offset the lost capacity.

SUMMARY

GENERAL RESIDENTIAL MARKET OVERVIEW

- 9 New Zealand's residential property market has recently experienced a significant boom, largely driven by historic low interest rates never seen before in New Zealand. After a sustained, strong cyclical period between 2012 and 2016, the Canterbury market experienced a slowdown in growth in 2017 and moderate decreases in mid-late 2018. During early 2020 the market began to see growth again, until the emergence of the COVID-19 pandemic and subsequent lockdown in March 2020. During the early stages of the pandemic, the residential market was widely predicted to experience a sharp correction in line with forecasts for the wider economy. Actions taken by the Government and Reserve Bank of New Zealand to support the national economy through the pandemic ultimately contributed to the country's largest residential real estate boom. Primary drivers were historic low interest rates in combination with significant fiscal stimulus and the removal of Loan to Value Ratios.
- 10 In the June to December 2021 period, demand for residential sections was unprecedented. The market locally within Canterbury

was appropriately described as 'frenzied' and in my opinion, forming a bubble. Ultimately, due to the shortage of stock of titled sections, land values increased monthly with developers resorting to tendering small tranches of section product shortly prior to titling in the face of strong competition by buyers for scarce product. In some instances, prices more than doubled after New Zealand emerged from its initial COVID-19 lockdown.

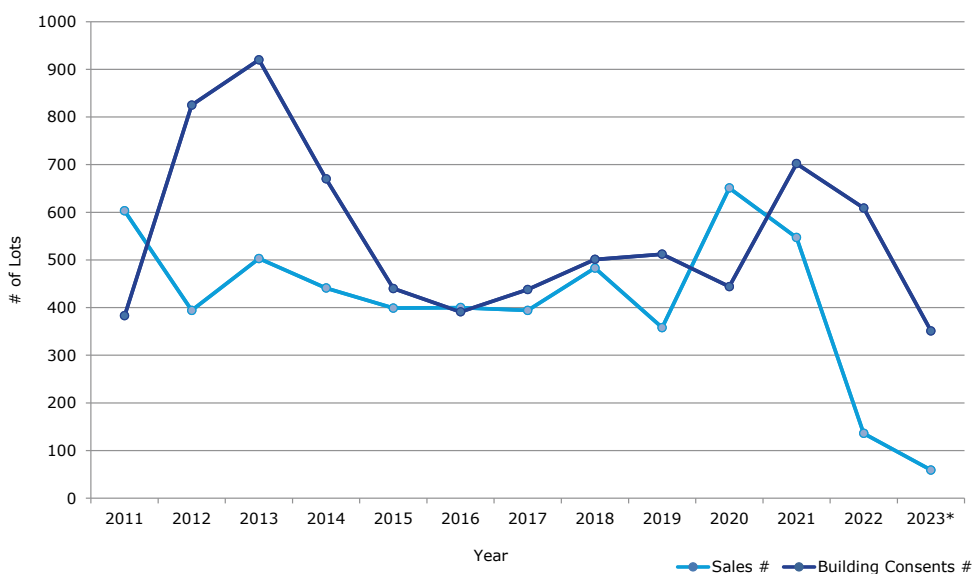
- 11 Changes in bank lending criteria due to the Credit Contract and Consumer Finance Act at the end of 2021, increasing interest rates, shortages of building materials and changes in market sentiment, led to demand for residential property coming off its peak levels although there was increased supply as the 2020/2021 building pipeline continued to deliver product to the market. The current position is that enquiry for housing continues to exist, but in much lower volumes.
- 12 Market intelligence research indicates that there remains an element of interest from purchasers, although few are prepared to make a purchase decision in the current market with continued uncertainty on interest rates, building costs, inflation, and the New Zealand economy. As a consequence, the volume of residential section sales has dwindled to a trickle and it is extremely difficult to forecast when the market will commence a return back to business as usual.
- 13 In conclusion, it is difficult to categorically measure the current market where there is limited transactional activity. What is clear is that there has been a correction below the peak levels experienced in late 2021. This downward price correction is likely to be between 10%-20% or thereabouts.
- 14 I have completed analysis on the number of initial residential section sales and new residential dwelling building consents in Waimakariri District over the last 13 years. The following is a summary table:

Residential Section Sales and New Building Dwelling Consents - WDC								
Location	Rangiora		Kaiapoi		Woodend		Totals	
Year	Sales #	Building Consents	Sales #	Building Consents	Sales #	Building Consents	Sales #	Building Consents
2011	220	211	194	79	189	93	603	383
2012	144	406	180	218	70	201	394	825
2013	148	394	228	300	127	226	503	920
2014	108	273	228	255	105	142	441	670
2015	124	173	186	190	89	77	399	440
2016	144	177	162	148	94	66	400	391
2017	111	219	117	123	166	96	394	438
2018	151	231	70	94	262	176	483	501
2019	83	187	57	59	218	266	358	512
2020	122	145	132	58	397	241	651	444
2021	49	205	130	139	368	358	547	702
2022	21	113	30	157	85	339	136	609
2023*	12	57	5	44	42	250	59	351

Sources: NZ Stats – New Dwelling consented by 2023 statistical area (Monthly) & Valpak (Headway Systems Limited)

* Part Year

Major Waimakariri District Township - Sales & New Dwelling Building Consents



Sources: NZ Stats – New Dwelling consented by 2023 statistical area (Monthly) & Valpak (Headway Systems Limited) *Part Year

- 15 Following the Canterbury earthquake sequence in 2010 - 2011, new dwelling consents surged in all three localities in the 2012 - 2014 period which resulted from demand from relocated red zone owners. Following the earthquake related rebuild, the market returned to business as usual. In 2021 - 2022, the volume of new dwelling consents increased in all three localities on the back of the boom in the residential market.
- 16 In the year ending December 2021, the total volume of new dwelling consents in the major townships of Waimakariri District was 702, just below the peaks in 2012 - 2014.
- 17 During the 11 year period from 2011-2021 there were 5,173 initial section sales or an average of 470 pa. In the same period there were 6,226 new dwelling consents issued or an average of 566 pa.
- 18 New dwelling consent data generally lags behind residential section sales by up to 12 months. Notwithstanding the lag affect, there is a discrepancy between the number of initial section sales and new dwelling consents because there are a number of examples where the land developer is the same as the dwelling builder and therefore there is no section sale transaction recorded.
- 19 Therefore, I consider the new dwelling consent data is a more accurate a representation of housing supply.
- 20 The new dwelling consent data for 2023 relates to a part year (eight months) although confirms a reduction in new dwelling consents in 2023. In Waimakariri District, the number of new dwelling consents in the eight month period in 2023 was 351 (58.0% of the 2022 full year number of 609).
- 21 The significant surge in demand for residential housing and residential sections during 2020-2022 placed stress on the supply of both vacant and improved product resulting in significant price escalation. This market cycle is well publicised and resulted from a mix of low interest rates and constrained supply.
- 22 In some locations at that time, there were few or no vacant residential sections available which resulted in significant price escalation. For example, in Selwyn District, price escalation in Prebbleton, Lincoln and Rolleston ranged between 100% - 145% over a 12 month period. In Rolleston, there were sections of at or around 600 sqm sold in 2020 for \$180,000 and a similar sized section sold in August 2021 for \$435,000, an increase of 142%. This is an extreme example, however it illustrates the constraint in supply of residential sections in Greater Christchurch at the time.

HOUSING CAPACITY ASSESSMENT

Survey Methodology

- 23 I was provided with a set of Geographic Information System (*GIS*) data prepared by Marshall Day Acoustics on behalf of CIAL which contained the full suite of Air Noise Contours associated with Christchurch International Airport (*Christchurch Airport*). This GIS data was merged with our Quickmap GIS software to enable accurate identification of relevant land areas.
- 24 As outlined at paragraph 7.1 above, for the purposes of the capacity assessment my survey utilised the 2023 Remodelled 50 dB Ldn Outer Envelope Air Noise Contour (*Remodelled Contour*). Where relevant, I also refer to the 2008 Operative 50 dB Ldn Air Noise Contour (*Operative Contour*).
- 25 The research team at Colliers reviewed the mapping data in association with aerial photographs and a physical inspection on the ground, and identified respective land areas available across Greater Christchurch.

Assumptions

- 26 I have made the following assumptions in my analysis and preparation of this evidence.

Rezoning Assumptions

- 27 Where I have identified land that is reasonably suitable to be rezoned for residential development, I have assessed the housing capacity taking into account its location. I have assumed that such land is adequately serviced to allow residential development.

Housing Capacity Land Yield

- 28 In arriving at the appropriate housing capacity land yield, I have adopted the following approaches:
- 28.1 Adopted yields in publicly available and consented subdivision master plans for Plan Change documents; or otherwise
- 28.2 Deducted 12.5% of the gross site area for stormwater management and then multiplied the remaining area by 15 households/hectare (*HHUs/ha*) to determine capacity. This is consistent with the methodology set out in the Canterbury Regional Policy Statement (*CRPS*), *Our Space*, the Greater Christchurch Housing Development Capacity (July 2021), the Greater Christchurch Housing Development Capacity Assessment (March 2023), and the Independent Review of Greenfield Densities commissioned by the Greater Christchurch Partnership and undertaken by Harrison Grierson Limited (*HGL*) (February 2021), and allows to some extent the greater capacity enabled by MDRS.

- 29 I have departed from this methodology for land in Rolleston where there is no publicly available and consented subdivision master plan and deducted 5.0% of the gross site area for stormwater management reflecting the superior drainage qualities of land in this specific location.
- 30 I have also departed from the above approach in relation to High Flood Hazard land where the yield has been reduced to 12 HHUs/ha.

Potential Future Development Capacity - Timing

- 31 The land identified under the Future Development housing capacity category has different characteristics in terms of development timeframes. Some land (e.g., Future Urban Development Areas (FUDA's) and New Development Areas (NDA's)) potentially will not be developed for some time and is not as 'development ready' as existing residential zoned land or land subject to plan changes.

Housing Capacity Land Categories

- 32 I have categorised the housing capacity into three broad categories and, in the case of the potential category, there are sub-categories:

32.1 *Remodelled Contour Housing Capacity:* In four locations the Remodelled Contour impacts development potential. The locations where residential development potential is lost are Kaiapoi and Rolleston because the Remodelled Contour has shifted over these areas. The locations where residential development potential is increased potentially are Harewood and Yaldhurst/ Broomfield because the Remodelled Contour has shifted away from these areas.

32.2 *Potential Housing Capacity Land:* I have identified potential housing capacity land currently not zoned for residential development as follows:

- (a) *Plan Changes:* In Waimakariri District there is one plan change (PC31) which has proceeded through the hearings process and was declined. This plan change is now subject to appeal. In Selwyn District there are three private PC's also subject to appeal. For these plan changes, I have considered "with" and "without" scenarios.
- (b) *Future Urban Development Areas:* In the Selwyn District Plan at Rolleston there are FUDA's. In response to the medium term shortfall in residential land, FUDA's were identified under Our Space- Greater Christchurch Settlement Pattern Update 2019.

- (c) *New Development Areas*: In Waimakariri District the FUDA's are described as NDA's in Rangiora and Kaiapoi in the operative District Plan.
- (d) *Greenfield Zoned Land*:¹ I have identified the housing capacity development potential of existing greenfield zoned land.

33 I note that my analysis does not take into account land that is subject to a rezoning submission in the proposed Waimakariri District Plan.

Rezoning Assumption

34 As outlined above, under all categories, I have assessed the housing capacity on the basis of the land being considered reasonably suitable for residential development, taking into account its existing use and location. I have assumed where possible that such land is adequately serviced to allow residential development. Consideration has been given to the NPS-HPL.

Geographic Areas

35 I have completed my analysis on the basis of suburbs, or groups of suburbs, in Christchurch and major townships in Waimakariri District and Selwyn District. The following is a summary:

35.1 Waimakariri District:

- (a) Rangiora
- (b) Woodend / Pegasus
- (c) Kaiapoi
- (d) Ohoka

35.2 Christchurch City:

- (a) North West - Belfast
- (b) North West – Harewood
- (c) North East – Redwood / Marshland
- (d) North East – Cranford

¹ "Greenfield land" is a term used in this evidence to describe undeveloped land that is potentially suitable for residential development and includes existing residential zoned land, FUDAs, NDAs, plan change areas and land zoned Rural but considered to be suitable for rezoning to residential.

- (e) South West – Yaldhurst / Broomfield
- (f) South West – Halswell / Awatea / Wigram

35.3 Selwyn District:

- (a) Prebbleton
- (b) Lincoln
- (c) Rolleston
- (d) West Melton

WAIMAKARIRI DISTRICT ASSESSMENT

36 The following is a summary of comments in relation to each geographic area in Waimakariri District:

Rangiora

37 In Rangiora, there is 15.3 ha which equates to a housing capacity of 226 HHU's relating to land which is zoned for residential development (not including NDA's). Excluded from my analysis is a large area of land which forms Stage 1 of Belgrove where subdivision development has commenced. The undeveloped zoned land is located in the north, south east and south west parts of the township. Significant areas are identified as NDA's, which is land classified as suitable for future urban development. Large blocks are located on the north eastern, south eastern and south western periphery of the township. In total there is 246.9 ha within NDAs, which equates to a housing capacity of 3,706 HHU's. In total, Rangiora has a total potential housing capacity of 3,932 HHU's. Attached at Appendix C is a plan of Rangiora depicting these areas.

Woodend / Pegasus

38 In the Woodend and Pegasus location, which includes Ravenswood, there is 25.5 ha zoned for residential development which equates to a housing capacity of 439 HHU's.

Kaiapoi

39 Kaiapoi has limited opportunity for further expansion due to the significant areas of land which are red zoned in and around the Kaiapoi River part of the township. Kaiapoi is also impacted by the Operative Contour and Remodelled Contour. The Remodelled Contour extends further to the north east and encroaches over land which is identified in NDAs.

40 In Kaiapoi there is 24.6 ha zoned for residential development which equates to 416 HHU's. This land is located on the eastern edge of the developed township and also to the west adjacent to

Silverstream. There is 79.2 ha identified within the NDAs located on the north eastern edge of the township, however 71.6 ha of this land is under the Operative and Remodelled Contours which therefore reduces the total effective NDA area to 7.6 ha or 91 HHU's. The net total area of potential and current zoned land in Kaiapoi is 32.2 ha or 507 HHU's.

- 41 NDA land located under the existing Operative Contour comprises a total area of 28.8 ha or 345 HHU's.
- 42 Additional NDA land to the north located under the Remodelled Contour comprises a total area of 42.8 ha or 514 HHU's. Therefore, the net effect of the Remodelled Contour on housing capacity in north east Kaiapoi is an exclusion of 514 HHU's.
- 43 I note that most of the land in the NDAs is located on the north eastern edge of Kaiapoi which is also located in a High Hazard area on the Waimakariri District 500 year Flood Hazard Map.
- 44 I have taken the view that because of the combination of the location inside the Remodelled Contour and the High Hazard flood categorisation, this land should be excluded from potential supply. Therefore, for the purposes of this analysis, I have excluded this land but included the residual area of 7.6 ha, which is outside the Remodelled Contour but within the High Hazard area, as potential. To account for the impediments on development of this constrained land I have adopted a reduced yield of 12 HHUs/ha.

Ohoka

- 45 PC31 named Ohoka Village would provide 850 residential sections as well as a school, retirement village and polo facility. PC31 was declined based on considerations under the National Policy Statement on Urban Development 2020 and rural character. The applicant has now appealed to the Environment Court. Following my methodology outlined earlier, I have adopted an assessed capacity for PC31 – Ohoka of 850 HHU's and included "with" and "without" scenarios in my summary tables below.

CHRISTCHURCH CITY ASSESSMENT

- 46 The following is a summary of comments in relation to each geographic area in Christchurch City:

North West - Belfast

- 47 In Belfast, I have identified a total area of 81.0 ha or 1,319 HHU's currently zoned for residential development. This includes land in Belfast Village, a block named Blue Skies adjacent to Belfast Village, and land to the south east including Spring Grove.

North West - Harewood

- 48 In Harewood, there is 59.2 ha zoned for residential development which equates to a housing capacity of 887 HHU's.
- 49 The Remodelled Contour in Harewood has moved further to the north west, opening up the opportunity for significant areas of land currently zoned Rural Urban Fringe as suitable to be rezoned for residential development (based on my methodology/assumptions set out above).
- 50 The movement to the north west of the Remodelled Contour has unlocked the potential for 117.7 ha or 1,765 HHU's to be rezoned for residential development. This land is located on the city side of Johns Road (*SH.1*). Some of this land comprising 93.4 ha (1,402 HHU's) falls within the HPL – LUC 2 category. I have therefore excluded this HPL land from the housing capacity. The net potential increase in housing capacity resulting from the Remodelled Contour in Harewood is therefore 363 HHU's.
- 51 Combining the existing greenfield zoned residential land with the land identified as potentially suitable for rezoning following the movement of the Remodelled Contour, results in a total housing capacity of 1,250 HHU's.
- 52 There is an additional area of land located on the northern side of SH.1 comprising 19.5 ha, equivalent to 256 HHU's adjacent to Clearwater Avenue and Willowcreek Lane. I have chosen to exclude this land on the basis that it is isolated by SH.1 and because it is subject to HPL – LUC 2 category.

North East – Redwood / Marshland

- 53 Redwood / Marshland includes the area in and around Prestons Road and further to the east where I have identified 132.5 ha zoned for residential development, which equates to a housing capacity of 2,029 HHU's.
- 54 Excluded from the survey area is a significant area of land zoned Residential New Neighbourhood (*RNN*) which is designated for stormwater purposes in the Highfield Park (South) Outline Development Plan (*ODP*).
- 55 In the north east, in particular in Marshland, there is an extensive area of land zoned Rural Urban Fringe, which potentially is suitable for rezoning to residential given its location north of the QEII Drive Expressway, east of the Northern Arterial and bordered by residential to the east and west. This extensive area of land is subject to the HPL – LUC 2 category. No allowance has been made in my housing capacity for this land potential.

North East – Cranford

- 56 I have identified two blocks of land either side of Cranford Street where there is 29.5 ha zoned for residential development, which equates to a housing capacity of 443 HHU's.

South West – Yaldhurst / Broomfield

- 57 There are four blocks of land in Yaldhurst/Broomfield which includes land at Riccarton Park adjacent to Riccarton Racecourse zoned for residential development, comprising 51.8 ha which equates to 777 HHU's.

- 58 In addition, there is an area of 10.2 ha zoned Rural Urban Fringe which is now outside the Remodelled Contour and immediately adjoins land currently zoned residential. This land area equates to a housing capacity of 153 HHU's. This land is subject to HPL – LUC 2 category, and has therefore been excluded from the housing capacity.

South West – Halswell / Awatea / Wigram

- 59 There is significant vacant land zoned for residential development in the Halswell / Awatea and Wigram areas of the city. This area of Christchurch has the most potential for further development in the short to medium term under the current zoning. I have identified 166.1 ha, which equates to 2,475 HHU's. Significant subdivision development has been completed or remains under construction in Halswell which has reduced the housing capacity in this location over the last year.

SELWYN DISTRICT ASSESSMENT

- 60 The following is a summary of comments in relation to each geographic area in Selwyn District:

Prebbleton

- 61 In Prebbleton, there is 117.0 ha zoned for residential development, which equates to 1,430 HHU's. All plan changes in Prebbleton have been resolved, with the exception of PC79 which was declined and is not under appeal. For this reason it has been excluded from the housing capacity.

Lincoln

- 62 There are a number of blocks of land located on the south eastern and north eastern edges of the township which are zoned for residential development comprising 55.9 ha. PC69, where the applicant was Rolleston Industrial Developments Limited, was recently approved under Variation 1 to the partially operative Proposed District Plan rezoning it to Medium Density Residential Zone (MRZ) and there are no appeal rights. This adds 168.3 ha to the housing capacity. The addition of the plan change land to the existing land zoned residential produces a total area of 224.2 ha

which equates to a housing capacity of 3,128 HHU's. Potentially, this land could produce a higher housing capacity due to the MRZ zoning.

Rolleston

- 63 Rolleston is the largest township in Selwyn District. I have identified a total area of 374.3 ha zoned for residential development which is equivalent to 5,875 HHU's.
- 64 Major development work has been commenced in the likes of Hampton Grange and Farrington Oval which has reduced the capacity in terms of my definition of Greenfield land.
- 65 Significant changes have occurred in Rolleston with large areas rezoned MRZ in Variation 1 to the partially operative Proposed District Plan.
- 66 There are three live plan changes in Rolleston which have all been declined but are now subject to appeal. The following is a summary:

Plan Change Status – Rolleston				
PC #	Applicant	Area Ha	Lots #	Status
PC73	Rolleston West Residential Ltd	152.2	2,282	Declined and under appeal
PC82	Brookside Road Residential Ltd	104.3	1,564	Declined and under appeal
PC81	Rolleston Industrial Developments	27.0	405	Declined and under appeal

- 67 Inclusion of all of the plan change areas under appeal adds 283.4 ha, which equates to a housing capacity of 4,251 HHU's. As for PC31 above in Waimakariri District, my summary tables below include "with" and "without" scenarios for these plan changes.
- 68 The combined Operative and Remodelled Contours encroach into the former PC71 area, reducing the development land area by 23.1 ha or 346 HHU's. Even though the combined Operative and Remodelled Contours reduce capacity by 23.1 ha, the net impact of the Remodelled Contour is 8.3 ha, which equates to a reduction in housing capacity of 125 HHU's.
- 69 Combining the existing greenfield zoned residential land, the FUDA land area and the land subject to plan change, the housing capacity area in Rolleston is 700.7 ha, which is equivalent to 10,769 HHU's.

West Melton

- 70 The land formerly comprising PC74 has been zoned General Residential Zone (GRZ) in the partially operative Proposed District Plan. The subdivision rules for this land specify that development of 10% of the land area is restricted to lots of between 600 – 1,000 sqm, with the balance 90% of land development to average lot areas of 1,500 sqm. A capacity of 8 HHU's/ha has therefore been adopted in this case to produce a housing capacity of 145 HHU's.
- 71 Land formerly known as PC77 now has approval for the development of a retirement village comprising 12.55 ha. Therefore, this land has been excluded from the housing capacity for West Melton.
- 72 Subdivision development has commenced on Wilfield Rise with this land under development now excluded.
- 73 The total area of land zoned for residential development in West Melton is therefore 50.2 ha, which is equivalent to 368 HHU's.

IMPACT OF REMODELLED CONTOUR ON HOUSING CAPACITY IN GREATER CHRISTCHURCH

Summary

- 74 Attached at **Appendix A** is a detailed summary of the Greenfield housing capacity data and attached at **Appendix B** is a map of Greater Christchurch identifying the various categories of land in the housing capacity study.
- 75 The following tables summarise my assessment of housing capacity in Greater Christchurch with and without the plan change land:

Colliers Housing Capacity Summary – With Plan Change Land

Location	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District					
Rangiora	-	-	3,706	226	3,932
Woodend / Pegasus	-	-	-	439	439
Kaiapoi	(514)	-	605	416	507
Ohoka	-	-	850	-	850
Christchurch City					
NW – Belfast	-	-	-	1,319	1,319
NW – Harewood	1,765	(1,402)	-	887	1,250
NE – Redwood / Marshland	-	-	-	2,029	2,029
NE – Cranford	-	-	-	443	443
SW – Yaldhurst/Broomfield	153	(153)	-	777	777
SW – Halswell/Awatea/Wigram	-	-	-	2,475	2,475
Selwyn District					
Prebbleton	-	-	-	1,430	1,430
Lincoln	-	-	-	3,128	3,128

Rolleston	(125)	-	5,019	5,875	10,769
West Melton	-	-	-	368	368
Total HHU's	1,279	(1,555)	10,180	19,812	29,716

Colliers Housing Capacity Summary – Without Plan Change Land

Location	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District					
Rangiora	-	-	3,706	226	3,932
Woodend / Pegasus	-	-	-	439	439
Kaiapoi	(514)	-	605	416	507
Ohoka	-	-	-	-	-
Christchurch City					
NW – Belfast	-	-	-	1,319	1,319
NW – Harewood	1,765	(1,402)	-	887	1,250
NE – Redwood / Marshland	-	-	-	2,029	2,029
NE – Cranford	-	-	-	443	443
SW – Yaldhurst/Broomfield	153	(153)	-	777	777
SW – Halswell/Awatea/Wigram	-	-	-	2,475	2,475
Selwyn District					
Prebbleton	-	-	-	1,430	1,430
Lincoln	-	-	-	3,128	3,128
Rolleston	(125)	-	768	5,875	6,518
West Melton	-	-	-	368	368
Total HHU's	1,279	(1,555)	5,079	19,812	24,615

76 The following is a summary of the housing capacity for each of the three local authorities with and without the plan change land:

Colliers Housing Capacity Summary – With Plan Change Land

Local Authority	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District	(514)	-	5,161	1,081	5,728
Christchurch City	1,918	(1,555)	-	7,930	8,293
Selwyn District	(125)	-	5,019	10,801	15,695
Total HHU's	1,279	(1,555)	10,180	19,812	29,716

Colliers Housing Capacity Summary – Without Plan Change Land

Local Authority	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District	(514)	-	4,311	1,081	4,878
Christchurch City	1,918	(1,555)	-	7,930	8,293
Selwyn District	(125)	-	768	10,801	11,444
Total HHU's	1,279	(1,555)	5,079	19,812	24,615

77 The following is a reconciliation table to arrive at a net housing capacity after excluding any questionable issues:

Greater Christchurch Housing Capacity- With Plan Change Land		
Greenfield Zoned Residential Housing Capacity		19,812
Plan Change Housing Capacity	5,101	
FDA / NDA (under Remodelled Contour) Housing Capacity	639	
FDA /NDA (outside Remodelled Contour) Housing Capacity	4,440	
RANC Greenfield Housing Capacity Potential (difference Remodelled Contour & Operative Contour)	1,918	12,098
Net Housing Capacity		31,910
Less FDA Impacted By /Remodelled Contour Area & HHZ		(639)
Less Potential Impacted HPL Housing Capacity		(1,555)
Net Total Housing Capacity		29,716

Greater Christchurch Housing Capacity- Without Plan Change Land		
Greenfield Zoned Residential Housing Capacity		19,812
Plan Change Housing Capacity	-	
FDA / NDA (under Remodelled Contour) Housing Capacity	639	
FDA /NDA (outside Remodelled Contour) Housing Capacity	4,440	
RANC Greenfield Housing Capacity Potential (difference Remodelled Contour & Operative Contour)	1,918	6,997
Net Housing Capacity		26,809
Less FDA Impacted By /Remodelled Contour Area & HHZ		(639)
Less Potential Impacted HPL Housing Capacity		(1,555)
Net Total Housing Capacity		24,615

78 The total impact on housing capacity in Greater Christchurch resulting from the Remodelled Contour compared to the existing Operative Contour equates to a net loss in housing capacity of 276 HHU's.

79 The following is a summary table of the net impact of the Remodelled Contour on housing capacity in Greater Christchurch. :

Remodelled Contour Impact	
Location	HHU's #
Kaiapoi	(514)
Harewood	363
Yaldhurst / Broomfield	-
Rolleston	(125)
Net Total	(276)

- 80 In the case of Harewood, this land is in a desirable residential location where residential development has generally transacted in the mid to upper price bracket.

IMPACT OF REMODELLED CONTOUR ON HOUSING CAPACITY IN WAIMAKARIRI DISTRICT

- 81 The following table summarises my assessment of housing capacity with and without plan change land in Waimakariri District in isolation:

Colliers Housing Capacity Summary – Waimakariri – With Plan Change Land					
Location	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District					
Rangiora	-	-	3,706	226	3,932
Woodend / Pegasus	-	-	-	439	439
Kaiapoi	(514)	-	605	416	507
Ohoka	-	-	850	-	850
Total HHU's	(514)	-	5,161	1,081	5,728

Colliers Housing Capacity Summary – Waimakariri – Without Plan Change Land					
Location	Remodelled Contour #	HPL #	Potential #	Zoned #	Total #
Waimakariri District					
Rangiora	-	-	3,706	226	3,932
Woodend / Pegasus	-	-	-	439	439
Kaiapoi	(514)	-	605	416	507
Ohoka	-	-	-	-	-
Total HHU's	(514)	-	4,311	1,081	4,878

- 82 The following is a reconciliation table to arrive at a net housing capacity for Waimakariri District with and without plan change land after:

Waimakariri District Housing Capacity – With Plan Change Land	
Greenfield Zoned Residential Housing Capacity	1,081
Plan Change Housing Capacity	850
FDA / NDA (under Remodelled Contour) Housing Capacity	514
FDA /NDA (outside Remodelled Contour) Housing Capacity	3,797
Net Housing Capacity	6,242
Less FDA Impacted By Remodelled Contour Area & HHZ	(514)
Net Total Housing Capacity	5,728

Waimakariri District Housing Capacity – Without Plan Change Land		
Greenfield Zoned Residential Housing Capacity		1,081
Plan Change Housing Capacity	-	
FDA / NDA (under Remodelled Contour) Housing Capacity	514	
FDA /NDA (outside Remodelled Contour) Housing Capacity	3,797	4,311
Net Housing Capacity		5,392
Less FDA Impacted By Remodelled Contour Area & HHZ		(514)
Net Total Housing Capacity		4,878

- 83 The total impact on housing capacity in Waimakariri District resulting from the Remodelled Contour compared to the existing Operative Contour equates to a decrease in housing capacity of 514 HHU's.
- 84 The only NDA land in Waimakariri District impacted by the Remodelled Contour is located on the north eastern edge of Kaiapoi. There is NDA land often referred to as the Momentum land which is under the Operative Contour comprising 28.8 ha (345 HHU's). In addition there is a further 42.8 ha (514 HHU's), part of which is also referred to as the Momentum land, under the Remodelled Contour. There is an area of 7.6 ha (91 HHU's) of NDA land outside and not impacted by the Remodelled Contour. Attached at Appendix D is a plan of this part of Kaiapoi depicting the various land areas discussed above.

CONSIDERATION OF OTHER IMPACTS ON HOUSING CAPACITY

Medium Density Residential Standards (MDRS)

- 85 I have considered the likely market impact that the new MDRS will have on Waimakariri District.
- 86 One of the key attractions of inner North Canterbury is the low density rural environment where there are few two level residential dwellings. House buyers are attracted to inner North Canterbury by the price advantage relative to suburban Christchurch, the larger section sizes and low development density. I am of the opinion this situation is unlikely to change in the foreseeable future.
- 87 It is too early to gauge the likely take up of this development opportunity however I am of the opinion it is most likely to suit locations where medium-high density residential housing is currently in demand close to major commercial and transport hubs.
- 88 MDRS will result in some higher density residential development in Waimakariri District, however in my opinion in the medium term, this will be relatively limited, in all likelihood it will be little more than has occurred in specific higher density areas within modern

subdivisions such as has occurred in Silverstream, Beach Grove and Pegasus together with central Rangiora.

- 89 My housing capacity assessment does not make any specific allowance for the additional potential which would result from adoption of MDRS. Therefore, my housing capacity analysis produces a conservative result.
- 90 The Formative Waimakariri Residential Capacity and Demand Model - IPI 2023 dated 8 December 2023 referred to the impact of MDRS on Waimakariri District urban areas.
- 91 Formative concluded MDRS is unlikely to result in a considerable amount of intensive development in greenfield areas and in the case of existing urban areas (brownfields) infill development is for the most part not financially feasible and therefore unlikely to provide much additional capacity for residential intensification in the medium term.

CONCLUSIONS

- 92 In Greater Christchurch the Colliers gross housing capacity of 31,910 HHU's reduces to a net housing capacity of 29,716 HHU's following adjustments for the impact of the Remodelled Contour and HPL restrictions.
- 93 The gross housing capacity without plan change land of 26,809 HHU's reduces to a net housing capacity of 24,615 HHU's following adjustments for the impact of the Remodelled Contour and HPL restrictions.
- 94 The net housing capacity under each scenario excludes any specific allowance for MDRS intensification.
- 95 The net impact of the introduction of the Remodelled Contour in Greater Christchurch, excluding consideration of land under the existing Operative Contour, is a loss of 276 HHU's.
- 96 The impact is considered to be relatively minor in the context of the total Greenfield land housing capacity in Greater Christchurch.
- 97 In Waimakariri District the Colliers gross housing capacity with plan change land of 6,242 HHU's reduces to a net housing capacity of 5,728 HHU's following adjustment for the impact of the Remodelled Contour.
- 98 The gross housing capacity without plan change land of 5,392 HHU's reduces to a net housing capacity of 4,878 HHU's following adjustment for the impact of the remodelled contour.

- 99 The net impact of the introduction of the Remodelled Contour in Waimakariri District, excluding consideration of land under the existing Operative Contour, is a loss of 514 HHU's.
- 100 In the Independent Hearing Panel Decision Report for PC31 – Ohoka Village, there was considerable discussion on housing capacity in Waimakariri District. The applicant, Rolleston Industrial Holdings Limited, challenged the WDC housing capacity input data completed by Formative Limited named WCGM22.
- 101 The Formative WCGM22 model assessed the medium term housing capacity in Waimakariri District at 5,934 HHU's. The model was validated by Inovo Projects and following site inspections and ground truthing, Inovo assessed a housing capacity of 4,361 HHU's. The Independent Hearing Panel accepted the Inovo validated capacity of 4,361 HHU's.
- 102 The WCGM22 does not include NDA land which is considered to be long term.
- 103 The land forming this evidence is only Greenfield land and only includes undeveloped land and excludes land that is developed and land under development. Therefore, the Colliers Greenfield land presents a conservative result. A large component of the housing capacity assessed in the WCGM22 model is excluded from the Colliers Greenfield survey.
- 104 I have prepared a table below which summarises the components of the WCGM22 model which are excluded from the Colliers Greenfield survey and also adds the Colliers Greenfield housing capacity for Waimakariri District to arrive at a combined total.

WCGM22 Summary & Colliers Greenfield Capacity

Location	WCGM 22 Capacity	Inovo Validated Capacity	Excl. from Colliers Greenfield
Rangiora			
Bellgrove	952	800	200
Townsend Fields	419	370	50
Summerset Retirement Village	211	182	182
Flaxton Village	59	52	52
East Rangiora	76	66	-
Kaiapoi			
Beachgrove	332	330	197
Silverstream	89	65	-
Future Silverstream	44	41	-
The Sterling	137	90	90
Momentum	116	-	-
Woodend/Pegasus			
Ravenswood	969	677	530
Freedom Lifestyle Village	131	114	114
Woodland Estate	104	75	48
Eders	42	45	45
Parsonage/Gladstone North	148	119	8
Gladstone South	18	73	-
Pegasus	369	86	86
Vacant/Infill			
Rangiora Vacant Lots	379	248	248
Rangiora Infill	355	270	270
Kaiapoi Vacant Lots	277	174	174
Kaiapoi Infill	292	273	273
Woodend/Pegasus Vacant Lots	413	209	209
Infill/Intensification	2	2	2
Total Adjusted WCGM22 Medium Term Capacity	5,934	4,361	2,778
Colliers Greenfield Land			5,728
Total Medium & Long Term Capacity			8,506

105 Adding the Colliers net Greenfield housing capacity of 5,728 HHU's including plan change land to the adjusted WCGM 22 capacity of 2,778 produces a total housing capacity including land developed and under development of 8,506 HHU's.

106 The Hearing Panel Decision Report concluded that urban growth within Waimakariri District is constrained by a number of factors thereby diminishing the development capacity which was assumed in the Formative research. The report found that the applicant had successfully demonstrated that the Council likely needs to provide for additional development capacity within the district to accommodate growth in the medium term and long term, particularly if the constraints identified come to fruition.

107 Based on the direction given to WDC it appears likely that additional land will be identified and rezoned in the proposed Waimakariri District Plan Review.

- 108 The impact of the Remodelled Contour on greater Christchurch is extremely limited with a reduction in housing capacity of 276 HHU's or 0.9%.
- 109 The impact of the Remodelled Contour on Waimakariri District is more pronounced, with a reduction in housing capacity of 514 HHU's or 9.0%. There are other areas in Waimakariri District (existing or potential) to offset the lost capacity.

Dated: 2 February 2024

Gary Sellars

Appendix A

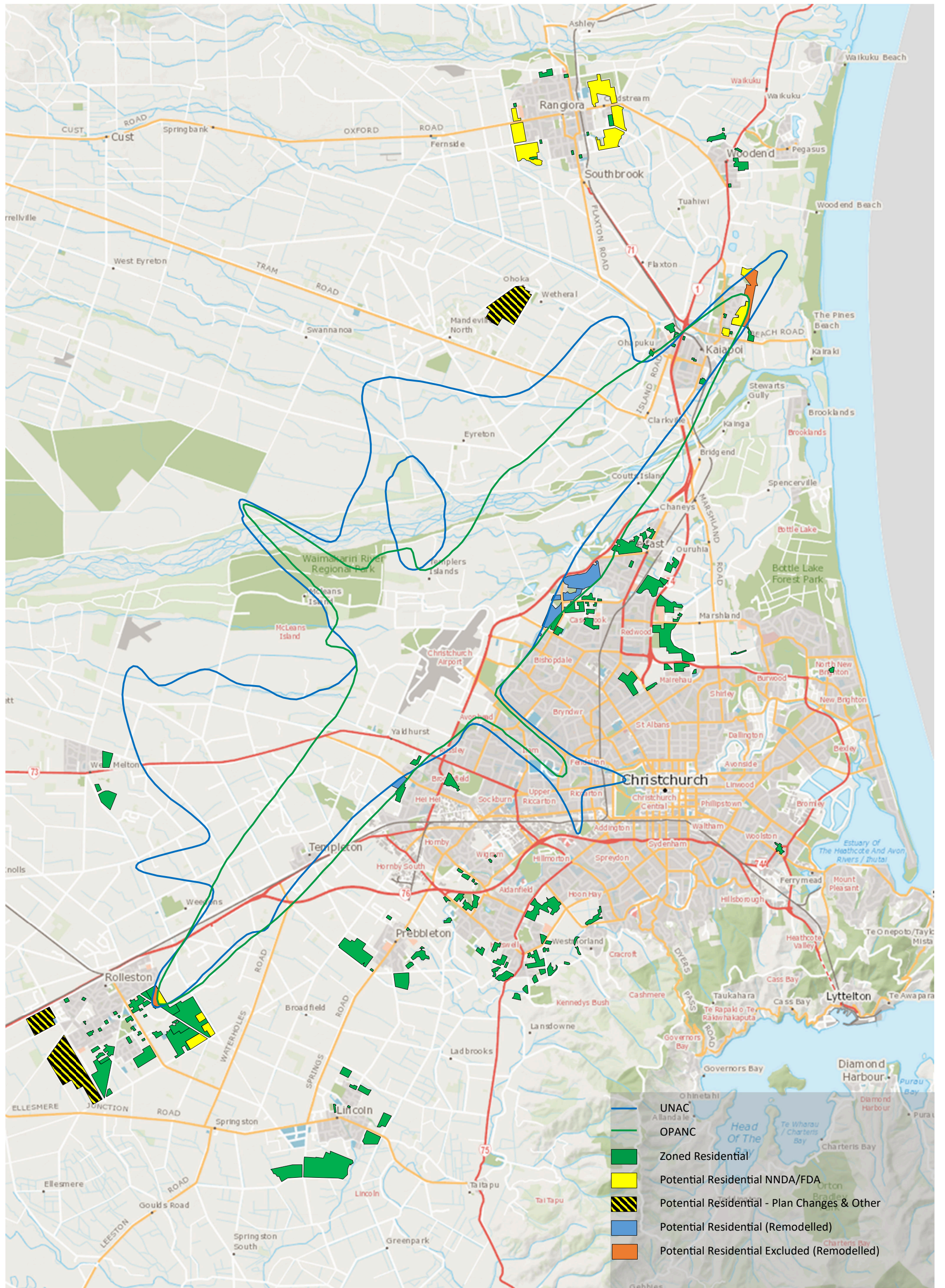
Colliers Housing Capacity Study

Location	FDA/NDA Inside RNAC 50 ha	FDA/NDA Inside RNAC 50 HC	FDA/NDA Outside RNAC ha	FDA/NDA Outside RNAC HC	Add. RNAC 50 - Greenfield Potential (Expert 50) ha	Add. RNAC - Greenfield Potential (Expert 50) HC	Plan Change ha	Plan Change HC	Greenfield - Zoned Residential ha	Greenfield - Zoned Residential HC	Total Greenfield/Future Development/ Plan Change & Including RNAC to Expert 50 Line - ha	Total Greenfield/Future Development/ Plan Change & Including RNAC to Expert 50 Line - HC	Less FDA Impacted by RNAC Area & HHZ ha	Less FDA Impacted by RNAC Area & HHZ HC	Less Potential Impacted HPL Area ha	Less Potential Impacted HPL HC	Total- Potential ha	Total- Potential HC
Waimakariri District																		
Rangiora																		
1									2.9	42	2.9	42					2.9	42
2									2.8	38	2.8	38					2.8	38
3									1.0	17	1.0	17					1.0	17
5									0.7	10	0.7	10					0.7	10
6									4.5	67	4.5	67					4.5	67
9									2.0	30	2.0	30					2.0	30
10									0.7	11	0.7	11					0.7	11
11									0.8	11	0.8	11					0.8	11
12			9.4	141							9.4	141					9.4	141
13			34.5	518							34.5	518					34.5	518
14			50.5	757							50.5	757					50.5	757
15			68.7	1,031							68.7	1,031					68.7	1,031
16			33.4	501							33.4	501					33.4	501
17			29.9	448							29.9	448					29.9	448
18			13.9	209							13.9	209					13.9	209
19			6.7	101							6.7	101					6.7	101
Total	-	-	246.9	3,706	-	-	-	-	15.3	226	262.3	3,932	-	-	-	-	262.3	3,932
Woodend/Pegasus																		
1									9.2	147	9.2	147					9.2	147
2									1.7	25	1.7	25					1.7	25
3									-	48	-	48					-	48
4									1.7	25	1.7	25					1.7	25
5									7.3	110	7.3	110					7.3	110
6									4.9	74	4.9	74					4.9	74
7									0.7	10	0.7	10					0.7	10
Total	-	-	-	-	-	-	-	-	25.5	439	25.5	439	-	-	-	-	25.5	439
Kaiapoi																		
1									0.4	6	0.4	6					0.4	6
2									5.8	133	5.8	133					5.8	133
3									6.9	117	6.9	117					6.9	117
4									1.6	30	1.6	30					1.6	30
5									0.4	5	0.4	5					0.4	5
6									2.8	42	2.8	42					2.8	42
7									0.7	11	0.7	11					0.7	11
8									6.0	72	6.0	72					6.0	72
9			-	-					-	-	-	-	0.0	0			-	-
11			-	-					-	-	-	-	0.0	0			-	-
12			-	-					-	-	-	-	0.0	0			-	-
13			42.8	514	7.6	91					50.4	605	(42.8)	(514)			7.6	91
Total	42.8	514	7.6	91	-	-	-	-	24.6	416	75.0	1,021	(42.8)	(514)	-	-	32.2	507
Ohoka																		
PC31							155.9	850			155.9	850					155.9	850
Total	-	-	-	-	-	-	155.9	850	-	-	155.9	850	-	-	-	-	155.9	850
Christchurch City																		
North West - Belfast																		
1									10.0	149	10.0	149					10.0	149
2									25.3	380	25.3	380					25.3	380
3									2.0	30	2.0	30					2.0	30
4									3.9	59	3.9	59					3.9	59
5									1.9	28	1.9	28					1.9	28
6									2.2	34	2.2	34					2.2	34
7									4.0	60	4.0	60					4.0	60
8									4.1	61	4.1	61					4.1	61
9									6.2	192	6.2	192					6.2	192
10									4.5	72	4.5	72					4.5	72
11									3.4	51	3.4	51					3.4	51
12									13.6	203	13.6	203					13.6	203
Total	-	-	-	-	-	-	-	-	81.0	1,319	81.0	1,319	-	-	-	-	81.0	1,319
North West - Harewood																		
1					62.1	931					62.1	931			(49.5)	(743)	12.6	188
2					0.4	6					0.4	6			(0.4)	(6)	-	-
3					20.3	304					20.3	304			(8.6)	(129)	11.7	175
4					4.7	70					4.7	70			(4.7)	(70)	-	-
5					29.8	447					29.8	447			(29.8)	(447)	-	-
6					0.4	7					0.4	7			(0.4)	(7)	-	-
1									7.8	117	7.8	117					7.8	117
2									1.0	14	1.0	14					1.0	14
3									18.6	280	18.6	280					18.6	280
4									0.8	12	0.8	12					0.8	12
5									1.0	14	1.0	14					1.0	14
6									3.3	49	3.3	49					3.3	49
7									0.2	3	0.2	3					0.2	3
8									8.5	127	8.5	127					8.5	127
9									5.6	84	5.6	84					5.6	84
10									12.5	187	12.5	187					12.5	187
Total	-	-	-	-	117.7	1,765	-	-	59.2	887	176.9	2,652	-	-	(93.4)	(1,402)	83.5	1,250

Appendix A

Location	FDA/NDA Inside RNAC 50 ha	FDA/NDA Inside RNAC 50 HC	FDA/NDA Outside RNAC ha	FDA/NDA Outside RNAC HC	Add. RNAC 50 - Greenfield Potential (Expert 50) ha	Add. RNAC 50 - Greenfield Potential (Expert 50) HC	Plan Change ha	Plan Change HC	Greenfield - Zoned Residential ha	Greenfield - Zoned Residential HC	Total Greenfield/Future Development/ Plan Change & Including RNAC to Expert 50 Line - ha	Total Greenfield/Future Development/ Plan Change & Including RNAC to Expert 50 Line - HC	Less FDA Impacted by RNAC Area & HHZ ha	Less FDA Impacted by RNAC Area & HHZ HC	Less Potential Impacted HPL Area ha	Less Potential Impacted HPL HC	Total- Potential ha	Total- Potential HC	
North East - Redwood/Marshland																			
1									18.9	324	18.9	324					18.9	324	
2									27.3	409	27.3	409					27.3	409	
3									0.9	13	0.9	13					0.9	13	
4									2.5	37	2.5	37					2.5	37	
5									37.1	556	37.1	556					37.1	556	
6									21.8	327	21.8	327					21.8	327	
7									3.4	52	3.4	52					3.4	52	
8									10.1	152	10.1	152					10.1	152	
9									1.1	17	1.1	17					1.1	17	
10									2.6	40	2.6	40					2.6	40	
11									2.0	30	2.0	30					2.0	30	
12									3.0	45	3.0	45					3.0	45	
13									1.8	27	1.8	27					1.8	27	
Total					-	-	-	-	132.5	2,029	132.5	2,029	-	-	-	-	132.5	2,029	
North East - Cranford																			
1									4.0	61	4.0	61					4.0	61	
2									25.5	382	25.5	382					25.5	382	
Total					-	-	-	-	29.5	443	29.5	443	-	-	-	-	29.5	443	
South West - Yaldhurst/Broomfield																			
1									5.6	85	5.6	85					5.6	85	
2									15.4	231	15.4	231					15.4	231	
3									14.9	224	14.9	224					14.9	224	
4 - RNAC Potential					10.2	153			15.8	237	26.0	390			(10.2)	(153)	15.8	237	
Total					10.2	153	-	-	51.8	777	62.0	930	-	-	(10.2)	(153)	51.8	777	
South West - Halswell/Awatea/Wigram																			
2									0.3	-	0.3	-					0.3	-	
3									0.7	-	0.7	-					0.7	-	
4									1.5	22	1.5	22					1.5	22	
5									3.0	45	3.0	45					3.0	45	
6									0.7	10	0.7	10					0.7	10	
7									4.5	67	4.5	67					4.5	67	
8									1.7	25	1.7	25					1.7	25	
9									1.6	24	1.6	24					1.6	24	
10									2.1	31	2.1	31					2.1	31	
11									3.1	46	3.1	46					3.1	46	
12									6.4	96	6.4	96					6.4	96	
13									1.7	26	1.7	26					1.7	26	
14									0.7	10	0.7	10					0.7	10	
15									46.4	696	46.4	696					46.4	696	
16									0.3	5	0.3	5					0.3	5	
17									9.6	144	9.6	144					9.6	144	
18									1.7	26	1.7	26					1.7	26	
19									1.9	28	1.9	28					1.9	28	
20									1.2	18	1.2	18					1.2	18	
21									7.7	116	7.7	116					7.7	116	
22									2.9	43	2.9	43					2.9	43	
23									19.0	285	19.0	285					19.0	285	
24									1.5	22	1.5	22					1.5	22	
25									1.7	25	1.7	25					1.7	25	
26									4.3	64	4.3	64					4.3	64	
27									5.6	83	5.6	83					5.6	83	
28									4.4	66	4.4	66					4.4	66	
29									8.3	125	8.3	125					8.3	125	
30									1.1	16	1.1	16					1.1	16	
32									2.1	32	2.1	32					2.1	32	
33									12.0	181	12.0	181					12.0	181	
34									2.5	38	2.5	38					2.5	38	
35									4.0	60	4.0	60					4.0	60	
Total					-	-	-	-	166.1	2,475	166.1	2,475	-	-	-	-	166.1	2,475	
Selwyn District																			
Prebbleton																			
1									3.0	46	3.0	46					3.0	46	
2									2.1	32	2.1	32					2.1	32	
3 (PC68)									67.0	820	67.0	820					67.0	820	
4									0.6	9	0.6	9					0.6	9	
5 (PC72)									28.7	290	28.7	290					28.7	290	
6									14.4	216	14.4	216					14.4	216	
7									1.1	17	1.1	17					1.1	17	
PC79									-	-	-	-					-	-	
Total					-	-	-	-	117.0	1,430	117.0	1,430	-	-	-	-	117.0	1,430	
Lincoln																			
1									7.3	109	7.3	109					7.3	109	
2									2.0	30	2.0	30					2.0	30	
3									7.5	113	7.5	113					7.5	113	
4									0.9	14	0.9	14					0.9	14	
5									0.4	6	0.4	6					0.4	6	
6									14.4	215	14.4	215					14.4	215	

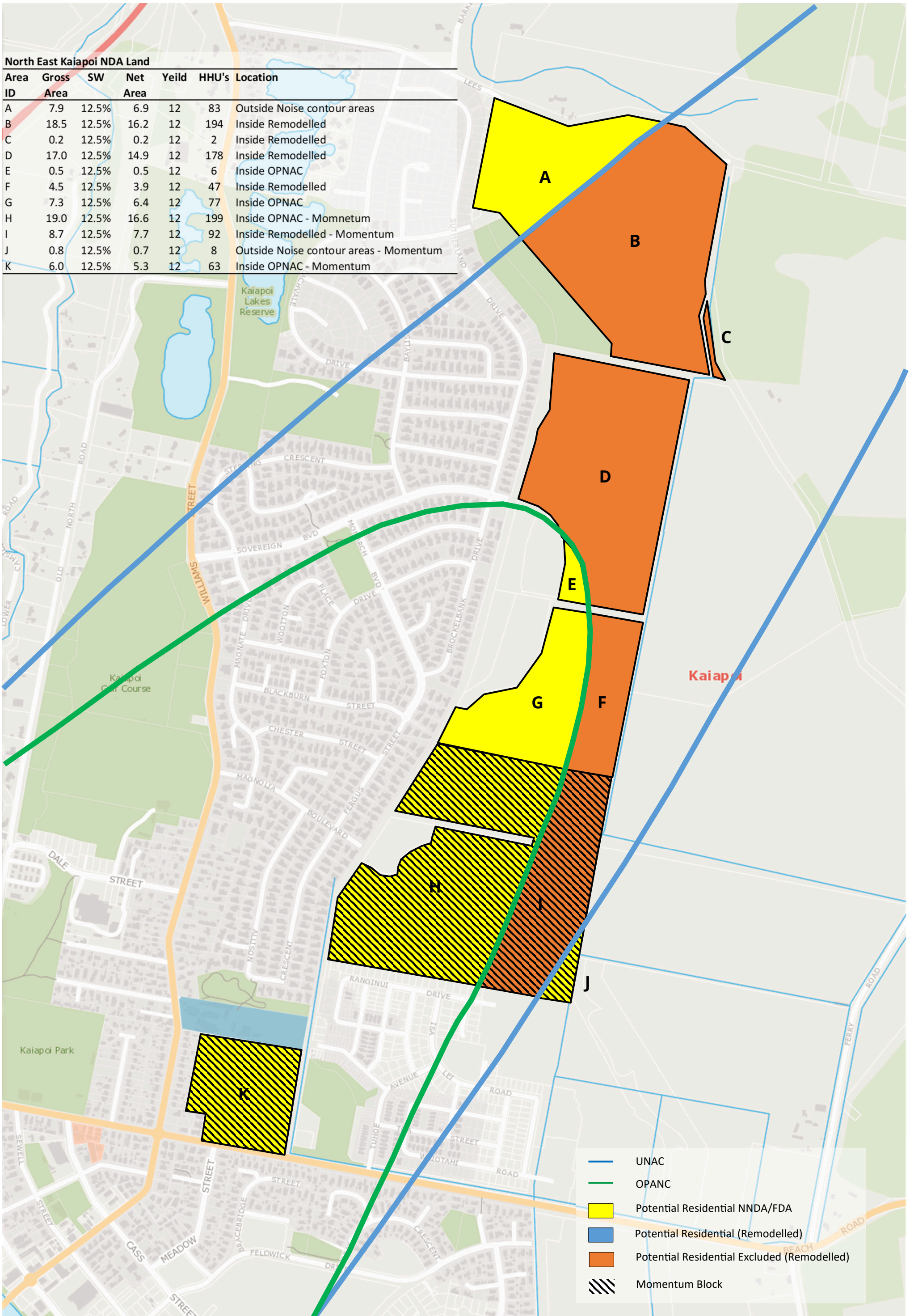
Appendix B



Appendix D - North East Kaiapoi - NDA Land

North East Kaiapoi NDA Land

Area ID	Gross Area	SW	Net Area	Yeild	HHU's	Location
A	7.9	12.5%	6.9	12	83	Outside Noise contour areas
B	18.5	12.5%	16.2	12	194	Inside Remodelled
C	0.2	12.5%	0.2	12	2	Inside Remodelled
D	17.0	12.5%	14.9	12	178	Inside Remodelled
E	0.5	12.5%	0.5	12	6	Inside OPNAC
F	4.5	12.5%	3.9	12	47	Inside Remodelled
G	7.3	12.5%	6.4	12	77	Inside OPNAC
H	19.0	12.5%	16.6	12	199	Inside OPNAC - Momnetum
I	8.7	12.5%	7.7	12	92	Inside Remodelled - Momentum
J	0.8	12.5%	0.7	12	8	Outside Noise contour areas - Momentum
K	6.0	12.5%	5.3	12	63	Inside OPNAC - Momentum



- UNAC
- OPNAC
- Potential Residential NNDA/FDA
- Potential Residential (Remodelled)
- Potential Residential Excluded (Remodelled)
- Momentum Block