APPENDIX G MARKET ASSESSMENT

PROPERTY **ECONOMICS**



LEHMANS RD, RANGIORA
PRIVATE PLAN CHANGE
ECONOMIC ASSESSMENT

Client: Doncaster Developments Ltd

Project No: 52145

Date: November 2021



SCHEDULE

Code	Date	Information / Comments	Project Leader
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TABLE OF CONTENT

1. II	NTRODUCTION	5
1.1.	KEY RESEARCH OBJECTIVES	5
1.2.	INFORMATION SOURCES	6
2. E	XECUTIVE SUMMARY	7
3. P	ROPOSED PLAN CHANGE	9
4. R	ESIDENTIAL MARKETS	.11
5. P	OPULATION AND HOUSEHOLD GROWTH	.14
6. D	WELLING CAPACITY AND SUFFICIENCY	.18
6.1.	WAIMAKARIRI URBAN RESIDENTIAL CAPACITY	.18
6.2.	RANGIORA WARD RESIDENTIAL CAPACITY	.19
7. S	UMMARY	.22
APPE	NDIX 1. PRELIMINARY CAPACITY PLAN	.23
APPEI	NDIX 2. RANGIORA CATCHMENT	.24
∆ DDF!	NDIX 3 OPERATIVE RESIDENTIAL ZONES AND FUDA	21



LIST OF TABLES

TABLE 1	WAIMAKAR	riri urban re	ESIDENTIAL SU	IFFICIENCY	SUMMARY	TABLE	18
TABLE 2	RANGIORA	RESIDENTIAL	SUFFICIENCY	SUMMARY	TABLE		19

LIST OF FIGURES

FIGURE 1 SITE LOCATION IN CONTEXT	9
FIGURE 2 IDENTIFIED CORE RESIDENTIAL CATCHMENT	11
FIGURE 3 GREATER CHRISTCHURCH EXTENT	12
FIGURE 4 WAIMAKARIRI DISTRICT RESIDENT POPULATION GROWTH	14
FIGURE 5 WAIMAKARIRI DISTRICT RESIDENT HOUSEHOLD GROWTH	15
FIGURE 6 RANGIORA RESIDENT POPULATION GROWTH	16
FIGURE 7 RANGIORA RESIDENT HOUSEHOLD GROWTH	17





1. INTRODUCTION

Property Economics have been engaged by Doncaster Developments Limited to undertake an economic assessment of a proposal to rezone approximately 7.8ha of land on Lehmans Road, Rangiora, to a zone enabling more intensive residential development at the site. The Applicant seeks to develop this land to achieve a more efficient use of the land resource and assist Rangiora meet its long term residential capacity requirements in an efficient manner.

This report assesses the residential demand/supply parameters in the context of the Waimakariri District's growth with a specific focus on Rangiora. It also reviews the relevant residential development strategies promoted by the Waimakariri District Council (WDC) in the context of Rangiora to identify the position of the proposed site for future residential development.

1.1. KEY RESEARCH OBJECTIVES

The core objectives of the report are to:

- Outline plan change location in the context of existing Rangiora urban area
- Identify future growth areas, their geospatial distribution and capacity as identified in the Great Christchurch Partnership report and HBA
- Evaluate population projection trends and household requirements to accommodate projected growth across the assessment areas (Waimakariri District and Rangiora) based on Statistics NZ latest estimates and projections under Medium and High Growth Scenarios.
- Determine the number of new dwellings required to accommodate projected growth, including unoccupied dwellings.



• Quantify the residential land sufficiency by assessing identified capacity against future dwelling demand in the short (3 years), medium (10 years) and long term (30 years).

1.2. INFORMATION SOURCES

Information and data have been obtained from a variety of sources and publications available to property economics, including:

- 2018 Census Dwelling Type Statistics NZ
- 2018 Waimakariri District Profile WDC
- Building Consents Statistics NZ
- Catchment Map Google Maps
- District Plan Changes WDC
- District Plan ODPs/Road Hierarchy WDC
- Greater Christchurch Housing Development Capacity Assessment July 2021 Greater Christchurch Partnership
- Household and Population Projections Statistics NZ
- Land Use Recovery Plan: Te Mahere Whakahaumana Tāone CERA
- Primary Parcels Layer LINZ
- Proposed Waimakariri District Plan WDC
- Rangiora Town Centre Strategy Blueprint To 2030+ WDC
- Section 32 Report- Whaitua Nohonoho/Residential Chapter WDC
- Ward Maps WDC
- Waimakariri 2048 District Development Strategy WDC
- Waimakariri District Council Independent Assessment Report July 2020 WDC
- Waimakariri Rural Residential Development Strategy WDC



2. EXECUTIVE SUMMARY

The proposal relates to rezoning approximately 7.8ha of land located in the northwest Rangiora on Lehmans Road from Residential 4A to Residential 2 enabling more intensive residential development at the site.

This report aims to undertake a high-level economic assessment of the economic merits of this proposal by reviewing and estimating and residential demand, capacity, and sufficiency in Rangiora and the wider Waimakariri over the next 3, 10 and 30 years. Based on the preliminary development plan, the subject land is proposed to provide around 105 allotments for residential dwellings.

Given the population and household projections of Statistics NZ, Waimakariri is projected to have around 113,000 residents and circa 43,900 households by 2048 under the High Growth Scenario.

In particular, Rangiora will experience a net increase of 14,590 residents and 6,130 households over the same timeframe from 2021 to 2048. This highlights a healthy demand for additional supply of residential development to accommodate the projected growth.

The Greater Christchurch Partnership (GCP) has recently released Greater Christchurch Housing Development Capacity Assessment (HBA) in July 2021. Based on the HBA 2021, Waimakariri urban residential capacity has a surplus of 440 dwellings in the short term (3-year timeframe). However, in the medium term, Waimakariri exhibits a shortfall of over 3,100 dwellings in order to accommodate the projected population if the extra capacity provided by Future Urban Development Areas (FUDA) is excluded.

Under these same conditions the long term shortfall is in excess of 10,700 dwellings across the District.

A further consideration is Change 1 to Chapter 6 of the CRPS, this change allowed Waimakariri to consider additional growth areas for Rangiora and Kaiapoi. In total the gross capacity of these areas has the potential to add a maximum of circa 11,400 dwellings. While this would provide for projected household growth it would result in a minimal margin for the Waimakariri and Rangiora markets. There are several other factors to consider in relation to the certainty of the FUDA provision being realised including:

- Multiple ownership
- The level of adoption through the District Plan
- Timing around release of capacity
- Provision of sufficient infrastructure capacity
- Potential submissions on individual area

In the long term, at the Waimakariri District level urban residential sufficiency is uncertain and depends on the development yield within these FUDA. There is likely to be a shortfall of around 870 dwellings at 12hh/ha by 2051. To ensure capacity sufficiency and optimise greenfield land



use in urban areas, additional dwellings provided by FUDA needs to be developed at a 15hh/ha density. If achieved, there is a capacity surplus of around 580 dwellings at 15hh/ha by 2051.

Looking at Rangiora specifically, it is estimated Rangiora requires additional 3,750 dwellings by 2051 when FUDA capacity is not considered. There is a sufficiency of 1,034-1,489 dwellings in the medium term, depending on the yield assumption on FUDA. Specifically, Rangiora is likely to have a shortfall of 715 dwellings at 12hh/ha by 2051, and a marginal surplus of 43 dwellings at 15hh/ha by 2051. This is on the basis all FUDA area come 'on stream' and are developed to that capacity within this timeframe. There is a lot of uncertainty around this occurring, specifically with infrastructure requirements and multiple land ownership constraints.

Based on these estimates, it is evident that significant uncertainties surround the future residential capacity of both Rangiora and the wider Waimakariri. These uncertainties mostly stem from the delivery of the identified FUDA (i.e., density, timing, feasibility, infrastructure, etc.).

In contrast, the proposal provides Rangiora and the broader district with a certainty over the short-medium term that extra capacity can be provided. This capacity is in an economically efficient location with the ability to 'plug into' existing infrastructure reducing marginal infrastructure costs to the community. The economic benefits of this proposal would likely outweigh the economic costs by a significant margin.

In conclusion, the assessment of this report supports the proposal to rezone the land for more intensive residential development. The future development at the proposed site is an appropriate use of the land and is more economically efficiently located than many FUDA identified areas with greater certainty around the additional capacity being delivered.



3. PROPOSED PLAN CHANGE

The proposed site is approximately 7.8ha of land located in the northwest corner of Rangiora and bounded to the west by Lehmans Road and rural area, to the southeast by Residential 2 zone, and to the north by the Rangiora Racecourse land.

This site is currently used for rural residential activities and is zoned as Residential 4A. This proposal seeks to rezone this land from Residential 4A to Residential 2 or a zone enabling more compact and efficient residential development at the site. Figure 1 shows the submission site of the proposal in the context of the existing WDP residential zones¹.

PPC Site Rangiora Rangiora Regasus Rangiora Regiona Regasus Pegasus Sata Hidway

FIGURE 1 SITE LOCATION IN CONTEXT

Source: WDC, Property Economics

¹ Note, this only shows some of the operative residential zones in Waimakariri.



Under the current Residential 4A provision for 'large lot' residential development, the submission site allows for approximately 15 allotments/dwellings at a capacity of one household per 5,000sqm. The preliminary capacity plan in Appendix 1 shows that the proposed residential development at the site will provide 105 dwelling units to Rangiora, ranging in size between 420sqm to 722sqm. Therefore, this proposal can be seen as an opportunity to expand the adjacent high-density residential zones and provide additional capacity of around 90 dwellings to Rangiora and the broader Waimakariri District. This will accommodate around 226 residentials in Rangiora on a one household per dwelling ratio and a 2.52 household size assumption².

² The household size is sourced from HBA 2021 based on Statistics NZ Average Household Size (AHS) projection for Waimakariri 2021 average household size.

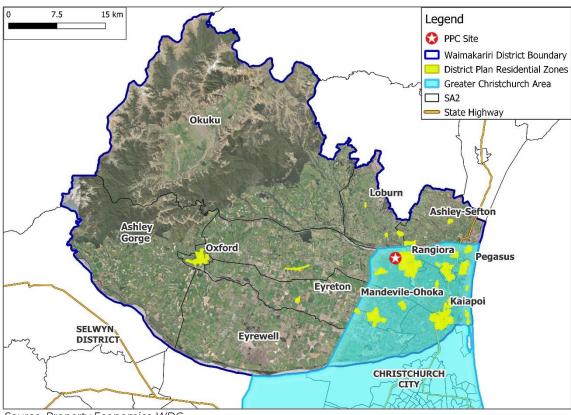


4. RESIDENTIAL MARKETS

To quantify the residential potential of the proposal, it is crucial to delineate the area in which the residential development of the proposal is likely to draw the majority of its purchasers. Figure 2 following illustrates the extent of the urban residential markets that are more likely to be redirected, or conversely, where residential dwellings in the proposal area are likely to compete.

As indicated in Figure 2, the Waimakariri District is the core residential catchment considered most relevant to the proposal in terms of residential development. Waimakariri covers around 225,000ha of land, bordered by the Waimakariri River in the south, the Puketearaki Range in the west, Pegasus Bay in the east and the Hurunui District boundary to the north. Most of the Waimakariri town centres are located on the southeast side of the district and are within the Greater Christchurch boundary and adjacent to Christchurch City via State Highway 1.

FIGURE 2 IDENTIFIED CORE RESIDENTIAL CATCHMENT



Source: Property Economics; WDC

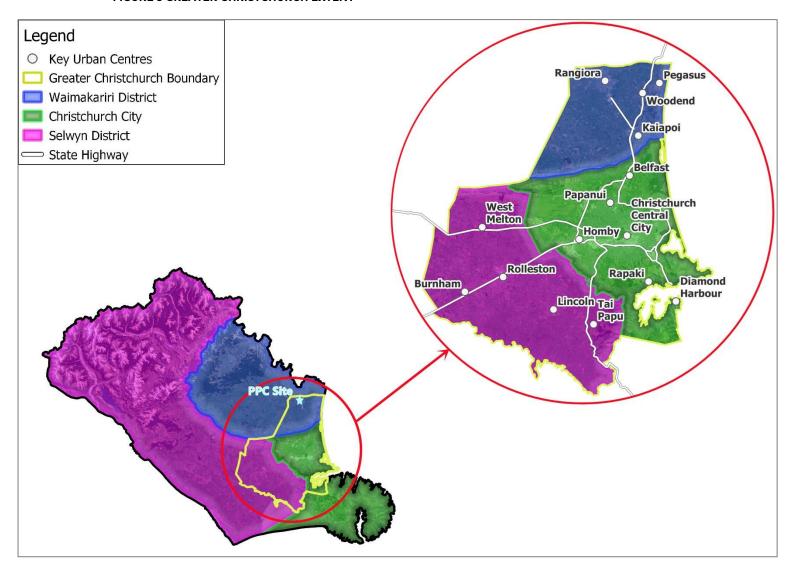
Note, the core market (i.e., Waimakariri District) identified in Figure 2 is not intended to represent the entire market of the proposal. Some residential developments likely to locate in the proposal area will also serve the broader Greater Christchurch region.



Figure 3 shows the Greater Christchurch extent that is expected to benefit from the residential developments at the proposal site. The Greater Christchurch region covers Christchurch City and the nearby areas within the Waimakariri and Selwyn Districts, from Burnham to Rangiora. Within the Waimakariri District boundary, Greater Christchurch covers the urban and most densely settled rural areas in the southeast corner of the Ashley River/Rakahuri. Specifically, the proposal site is located on the northern edge of the Greater Christchurch region.

Given the proximity to a major city (i.e., Christchurch) across the broader Canterbury region, Waimakariri is permeable to commuting and commerce between the two areas. It can be expected that the extra supply of dwellings in Waimakariri, especially within the Greater Christchurch boundary, will potentially serve the wider Greater Christchurch area.

FIGURE 3 GREATER CHRISTCHURCH EXTENT



Source: Property Economics, Google Map





5. POPULATION AND HOUSEHOLD GROWTH

Dwelling demand is heavily influenced by population growth. This section assesses the population and household growth projections for Waimakariri and Rangiora based on the latest estimates and projections (June 2021) sourced from Statistics NZ. The Medium and High population growth projections are shown as best estimates of the current growth trajectory for Waimakariri.

As indicated in Figure 4, the 2021 population estimate for the Waimakariri sits between the Medium and High Growth projections, which is a trend to continue over the next 27 years. Specifically, under the High Growth scenario, the Waimakariri population will reach around 112,697 residents by 2048. This is a 70% growth (or an increase of 46,447 residents) from the 2021 base year of 66,250 residents, signalling a significant demand for dwellings at the district level. Under the Medium growth scenario, a more conservative estimate of 86,723 residents by 2048 is expected, equating to a proportional increase of 31% (or 20,473 residents) from the 2021 estimate of 66,250 residents.

120,000 112,697 110,000 105,050 **Population** 97.550 100,000 June 2021 89,830 Estimate- 66,250 90,000 -0 64,740 86,723 83,030 80,000 61,340 79,630 75,790 70,000 71.520 66,750 60,000 50,000 52,260 40,000 2019 2021 2025 2029 2043 2047 2017 2023 2027 2031 2041 ─ ○─ Medium Projections - Population **- ○ -** High Projections - Population **─**● Population Estimates

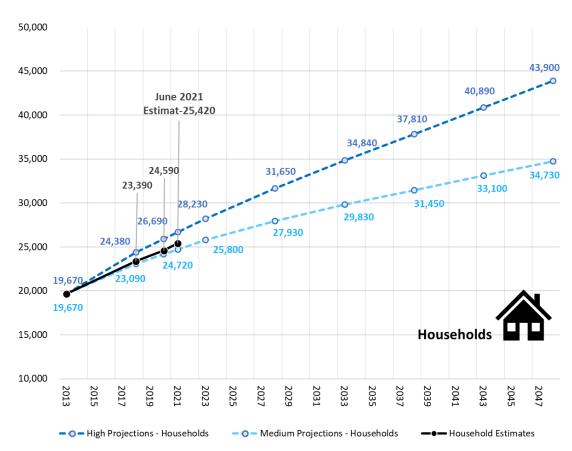
FIGURE 4 WAIMAKARIRI DISTRICT RESIDENT POPULATION GROWTH

Source: Statistics NZ; Property Economics



In contrast, Figure 5 shows that the Waimakariri households will increase faster than the population. By 2048, it will have 43,900 and 34,730 households under the High and Medium Growth scenario, respectively. This represents a 73% and a 37% increase from the 2021 base year of 25,420 households. Therefore, an additional 18,480 dwellings will be required to accommodate the projected growth under the High projection over the next 27 years on a one household per dwelling basis. Note that this estimate contains both urban and rural areas demand in Waimakariri.

FIGURE 5 WAIMAKARIRI DISTRICT RESIDENT HOUSEHOLD GROWTH



Source: Statistics NZ; Property Economics

Figures 6-7 show the estimated population for the Rangiora Subdivision of the Rangiora-Ashley Ward based on the Waimakariri Local Body Election boundary. The catchment is presented in Appendix 2.

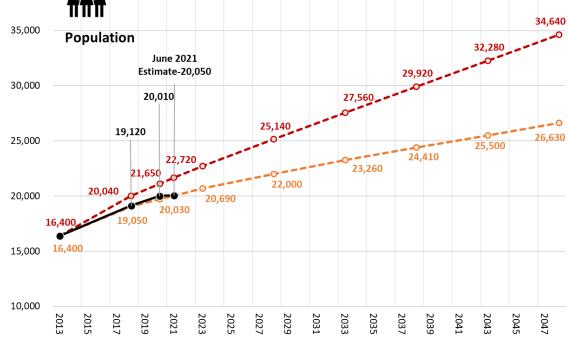
Note, even though the most recent population growth from 2020 to 2021 was marginal in Rangiora, the holistic dwelling demand across Waimakariri for the development proposed at the submission site will not be materially affected. This is evident in Figures 4-5, given the robust projected growth in the wider district.



It is estimated that there will be 34,640 residents living in Rangiora by 2048 under the High Growth scenario. This equates to a 73% increase (or a net growth of 14,590 residents) from the base year 2021. In contrast, the Medium Growth projections suggest that the Rangiora population will grow by around 33%, from 20,050 residents in 2021 to 26,630 residents by 2048.

40,000 35,000 **Population** June 2021

FIGURE 6 RANGIORA RESIDENT POPULATION GROWTH



Source: Statistics NZ; Property Economics

─ ○ Medium Projections - Population

As indicated in Figure 7, Rangiora is estimated to grow from 8,010 households in 2021 to 14,140 households in 2048 under the High projections, equating to a demand for an additional 6,130 dwellings (a 77% increase) over the next 27 years on a one household per dwelling basis. Under a more conservative Medium Growth projection, an additional 3,177 dwellings will be required out to 2048 in Rangiora, equating to a 40% increase from 8,010 households in the 2021 base year.

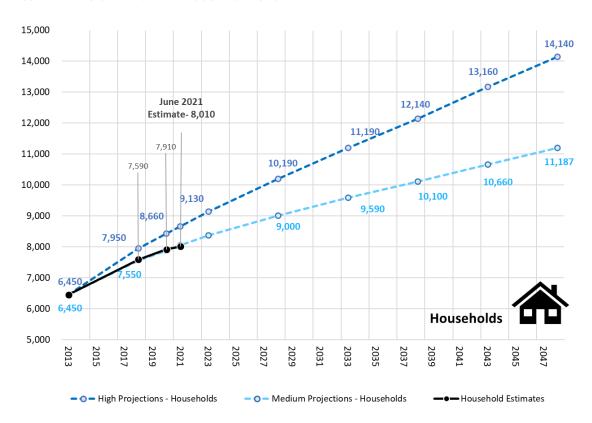
- ○- High Projections - Population

Population Estimates

By comparing the projections in population and households, the number of households is expected to grow faster than the population in Rangiora and the wider district. This is primarily due to a projected fall in the person per dwelling ratio over the forecast period. As household size decreases over time, it can be expected that there will be a large future demand for more compact residential development across the district. This requires efficient use of residential zoned land to provide the maximum number of quality and affordable dwellings to accommodate the growing demand.







Source: Statistics NZ; Property Economics

Further, given the close proximity to Christchurch city (30 minutes to Christchurch CBD by driving) and growing popularity as a place to live, the most tangible influence of Rangiora growth path moving forward is likely to be the new residential supply. Residential supply and capacity often have a marked influence on an area's market, with new supply a critical conduit to realising population growth. The supply rate correlates to the growth rate, with confined supply triggering many flow-on house supply issues and ultimately slowing growth.



6. DWELLING CAPACITY AND SUFFICIENCY

This section reviews and assesses the dwelling capacity and sufficiency in Rangiora and the wider Waimakariri based on *Greater Christchurch Housing Development Capacity Assessment* (hereafter, HBA 2021) released in July 2021 and Property Economics estimates.

In accordance with the HBA 2021, this section considers the potential residential capacity in the Future Urban Development Areas identified by *Our Space- Greater Christchurch Settlement Pattern Update 2019* (hereafter, Our Space 2019). These areas were proposed to deal with the medium-term dwelling shortage across the broader Greater Christchurch area. In July 2021, the Minister for the Environment has approved Proposed Change 1 to Chapter 6 of the *Canterbury Regional Policy Statement* (CRPS), which identifies several FUDA in town centres, including Rangiora. The HBA 2021 estimates FUDA capacities under two different scenarios, assuming that the dwelling in these areas will be delivered at either 12hh/ha or 15hh/ha. For instance, the '12hh/ha' assumption refers to 12 households per hectare.

6.1. WAIMAKARIRI URBAN RESIDENTIAL CAPACITY

Table 1 below summarises the urban residential sufficiency for Waimakariri based on the HBA 2021 estimates. Note, the Plan-Enabled, Realisable and Feasible capacities are estimated to be the same for Waimakariri over the next 30 years.

TABLE 1 WAIMAKARIRI URBAN RESIDENTIAL SUFFICIENCY SUMMARY TABLE

WAIMAKARIRI URBAN AREAS	SHORT TERM (2021-24)	MEDIUM TERM (2021-31)	LONG TERM (2021-2051)
DWELLING DEMAND			
without NPS-UD Buffer	1,528	4,508	11,160
with NPS-UD Buffer	1,833	5,410	13,059
DWELLING CAPACITY			
without FUDA	2,273	2,273	2,273
with FUDA at 12hh/ha	2,273	7,673	12,192
with FUDA at 15hh/ha	2,273	9,123	13,642
DWELLING SUFFICIENCY			
without FUDA	440	-3,137	-10,786
with FUDA at 12hh/ha	440	2,263	-867
with FUDA at 15hh/ha	440	3,713	583

Source: Greater Christchurch Partnership

As indicated in Table 1 below, Waimakariri has no urban residential capacity shortfall in the short term. The estimated capacity surplus is around 440 dwellings by 2024. However, there is a



shortfall of 3,137 dwellings in the medium term and a more substantial shortfall of 10,786 if no FUDA are developed. This estimated shortfall is largely offset by the additional capacity provided by FUDA, leading to a surplus of 2,263-3,713 dwellings in the medium term.

In the long term, the urban residential capacity of Waimakariri remains uncertain. There is a shortfall of 867 dwellings by 2051 when FUDA are developed at 12hh/ha. To ensure capacity sufficiency and optimise greenfield land use in urban areas, additional dwellings provided by FUDA needs to be developed at a density of 15hh/ha. It is predicted that there is a surplus of 583 dwellings at the 'optimal' 15hh/ha yield at the district level.

Given these estimates, Waimakariri future urban residential capacity will be largely dependent on the expected capacity of FUDA. This creates uncertainties in the district to accommodate the projected population growth, highlighting the requirement of 'back-up' residential development to secure the district's prosperity.

6.2. RANGIORA WARD RESIDENTIAL CAPACITY

Compared to the residential capacity and sufficiency for the entire district, Table 2 presents the estimates for Rangiora Ward specifically. It is worth mentioning that the HBA 2021 has applied an 8% assumption when estimating total dwelling demand in 3 TAs (i.e., Waimakariri, Christchurch and Selwyn), which is the assumption applied in this section.

TABLE 2 RANGIORA RESIDENTIAL SUFFICIENCY SUMMARY TABLE

RANGIORA WARD	2021 (Base)	2024	2031	2051
Households	8,010	8,496	9,118	11,536
Dwellings (incl. Unoccupied Dwellings)	8,707	9,235	9,911	12,539
Net Dwelling Requirement	-	528	1204	3833
Net Dwelling Requirement (with buffer)	-	634	1,445	4,407
Total Zoned Existing Capacity (est.)	660			
FUDA Capacity (12hh/ha)	-	303	1,819	3,032
FUDA Capacity (15hh/ha)	-	379	2,274	3,790
DWELLING SUFFICIENCY (without FUDA)	-	26	-785	-3,747
DWELLING SUFFICIENCY (12hh/ha)	-	329	1,034	-715
DWELLING SUFFICIENCY (15hh/ha)	-	405	1,489	43

Source: Property Economics

As summarised in Table 2, Rangiora has approximately 98ha of land within the operative residential zones that is vacant and available to accommodate future resident growth. The vast majority of the vacant residential land is within the Residential 2 zone and is in the ward's



southwestern edge. This gives an estimated total of around 660 zoned vacant or developable lots in Rangiora. Appendix 3 depicts the location of these zones in the context of Rangiora.

Having compared this zoned capacity to the estimated net dwelling requirement (with NPS-UD buffer) based on Statistics NZ Medium Growth projections, Rangiora is expected to have a negligible sufficiency of 26 dwellings by 2024, with FUDA estimated capacity excluded. However, in the medium and long term, Rangiora zoned capacity cannot accommodate the growing net dwelling demand, leading to a moderate shortfall of around 785 dwellings by 2031 and a more substantial shortage of 3,747 dwellings by 2051.

As shown in Appendix 3, the identified FUDA are located to the west and east of Rangiora. These areas have total land of approximately 389ha based on spatial data. The total developable land within these areas, therefore, is around 253ha, with 35% of land excluded for infrastructure development. This adds a total additional capacity of approximately 3,032 dwellings at 12hh/ha and 3,790 dwellings at 15hh/ha to the zoned capacity in the long term.

However, these additional capacities are likely to be gradually delivered over the next 30 years, with the most residential development completed in the medium term. Accordingly, it is assumed that the realisable rate of these FUDA in Rangiora will be 10% by 2024, 60% by 2031, and 100% by 2051, cumulatively. Note, these percentages are for indicative purposes only and never be as absolute.

Based on the assumptions mentioned above, the existing zoned dwelling supply and estimated FUDA capacity together provide sufficient capacity to cover the projected dwelling demand, including the NPS-UD buffer for the 10-year time period (till 2031). In the long term, however, additional capacity will be required to meet the net dwelling demand of 4,407 dwellings by 2051 if dwellings within FUDA are developed at 12hh/ha. Suppose Rangiora's population does reach 26,630 residents by 2051 (as is projected under the Medium projection) and the 8% unoccupied dwelling assumption holds true over the next 30 years. In that case, Rangiora will need to supply for an additional 715 dwellings.

Under the high-density scenario (i.e., 15hh/ha), Rangiora dwelling capacity is sufficient for the 30 years till 2051, with 43 dwellings left for future demand. This marginal surplus is likely to be occupied quickly, signalling a dwelling shortfall in Rangiora to accommodate further population growth right after 2051.

In addition to the estimated shortfall and insignificant surplus in Rangiora dwelling capacity, it is worth considering the significant uncertainties surrounding the development progress of FUDA. For instance, these uncertainties may stem from the great front-end consent costs associated with the development. These costs may raise the developer's holding costs and therefore reduce the likelihood of development. Also, early lock-in of consent parameters reduces a developer's flexibility to react to changing market conditions, reducing the possibility of embarking on development.

According to Deloitte's *Construction Sector COVID-19 Recovery Study*, local authorities as key spenders on infrastructure have experienced additional funding challenges because of the



pandemic-led economic downturns. This may lead to temporary residential development delays within the identified FUDA.

The estimated impact of FUDA on dwelling capacity largely depends on the realisable rate assumptions. Indeed, it is estimated that Rangiora will have a dwelling shortfall since 2024 if these FUDA are only able to deliver less than 25% of their capacity in the medium term (i.e., 758 dwellings at 12hh/ha and 948 dwellings at 15hh/ha).

In contrast to the significant uncertainties associated with FUDA delivery, the proposal can provide a meaningful extra supply of around 90 dwellings to the zoned capacity and help satiate some net dwelling requirements in the ward and the wider district. Therefore, the proposal is in a good position to accommodate the projected Rangiora population growth by adding certainties to the future supply of dwellings in the ward and the wider district.



7. SUMMARY

The Proposal is currently zoned (rural) Residential 4A with an estimated capacity of 15 dwellings under the Operative District Plan (ODP). In contrast, a high-density residential zone such as Residential 2 would offer a more compact residential development at the site, allowing for approximately 105 dwellings to be developed to the north-western corner of Rangiora.

The core economic market of this proposal, the Waimakariri District, is projected a have a strong growth out to 2048, growing by around 70% from the 2021 base year under the High Growth scenario. This level of growth equates to 46,447 net additional residents by 2048.

Based on HBA 2021, Waimakariri urban residential capacity is anticipated to have a significant shortage of 3,137 dwellings by 2031 and a more substantial shortfall of 10,786 dwellings by 2051 when FUDA capacity is excluded. Even with the extra dwellings supplied by FUDA, the district is likely to see a shortfall of 867 dwellings at the 12hh/ha density in the long term. Therefore, the district is able to accommodate the projected growth over the next 30 years only when FUDA is developed at 15hh/ha.

As the largest town centre in Waimakariri, Rangiora is anticipated to have additional 14,590 residents and 6,130 households by 2051 under the High Growth scenario. This equates to net growth of 73% in population and 77% in households over the next 30 years. To accommodate such significant growth, an additional supply of 3,747 dwellings will be required by 2051 in Rangiora when FUDA capacity is not considered.

Considering the extra dwellings supplied by FUDA, Rangiora has a sufficiency of 1,034-1,489 dwellings in the medium term, depending on the yield assumption. In the long term, however, Rangiora is unable to accommodate the projected growth with a shortfall of 715 dwellings at 12hh/ha. Even at a higher density of 15hh/ha, Rangiora dwelling sufficiency is estimated to be marginally above the projected demand, with a negligible surplus of 43 dwellings by 2051. These 43 dwellings will be occupied quickly given the strong population growth in Waimakariri.

In contrast to the uncertainties associated with the delivery of FUDA over the next 30 years, the extra capacity of 90 dwellings (on top of the current capacity of around 15 allotments under Residential 4A zoning) contributed by the proposal will accommodate a meaningful and certain portion (approximately 226 residents) of the projected growth in a more foreseeable future. In light of this, the proposal is critically required to deal with the projected dwelling capacity insufficiency in Rangiora and the wider district and optimise the land use efficiency at the proposed site.



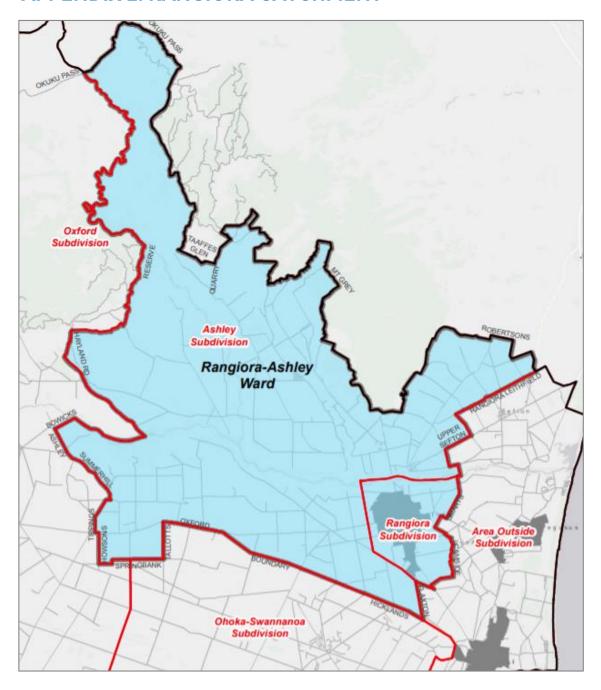
APPENDIX 1. PRELIMINARY CAPACITY PLAN



Source: Suburban Estates



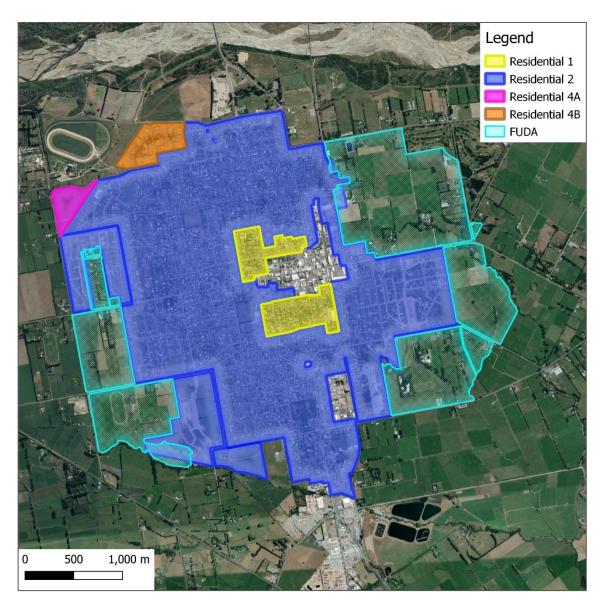
APPENDIX 2. RANGIORA CATCHMENT



Source: WDC



APPENDIX 3. OPERATIVE RESIDENTIAL ZONES AND FUDA



Source: WDC