

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

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

and: Hearing Stream 12: Rezoning requests (larger scale)

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

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

Statement of evidence of Gary Sellars (Market Analysis and
Medium Density Residential Standards) on behalf of Carter Group
Limited and Rolleston Industrial Developments Limited

Dated: 5 March 2024

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**STATEMENT OF EVIDENCE OF GARY SELLARS ON BEHALF OF
CARTER GROUP LIMITED AND ROLLESTON INDUSTRIAL
DEVELOPMENTS LIMITED**

INTRODUCTION

- 1 My full name is Gary Russell Sellars. 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.
- 2 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 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.
- 3 I have been involved in the valuation of a number of large residential subdivision developments during the last 35 years including Pegasus, 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.
- 4 I am familiar with the Submitters' request to rezone land bound by Mill Road, Whites Road, Bradleys Road (the *Site*).
- 5 I was involved in private plan change 31 (*PC31*) to rezone this land under the operative District Plan.

CODE OF CONDUCT

- 6 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 Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of 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 the opinions expressed.

SCOPE OF EVIDENCE

- 7 My evidence will address:
- 7.1 The residential property market in Waimakariri District; and
 - 7.2 The likely market impacts that the new Medium Density Rules (*MDR*) will have on Waimakariri District
- 8 In preparing my evidence, I have reviewed:
- 8.1 The National Policy Statement on Urban Development 2020 (*NPS-UD*).
 - 8.2 The Waimakariri Residential Capacity and Demand Model - IPI 2023 dated 8 December 2023 prepared by Formative Limited (*Formative*).
 - 8.3 Inovo Projects' (*Inovo*) review dated 30 August 2023 of Formative's Waimakariri Residential Capacity and Growth Model 2022 (*WCGM22*) Development Model.
 - 8.4 The Independent Hearing Panel Decision Report for Plan Change 31 (*PC31*) dated 27 October 2023.

SUMMARY

- 9 My evidence provides analysis of the current residential section market in the urban environment of Waimakariri District and assesses the current demand and capacity in relation to the proposal to rezone the subject land in Ōhoka to, among other things, provide approximately 850 residential lots.
- 10 The current medium term capacity in the three main Waimakariri District townships of Rangiora, Kaiapoi and Woodend/Pegasus as measured by the updated WCGM22 of 4,205 household units (*HHUs*) is less than my forecast demand of 5,180 HHUs which increases to 6,216 HHUs when the competitive margin is added.
- 11 Adopting my current medium term demand including the competitive margin of 6,216 HHUs or 622 HHUs per annum indicates that the current medium term capacity will be exhausted in just under seven years.
- 12 In order to meet the NPS-UD requirements to provide at least sufficient development capacity over the medium and long term, additional land needs to be rezoned as a matter of urgency.

RESEARCH METHODOLOGY

- 13 To quantify the current residential capacity available, my research team at Colliers has physically inspected on the ground and

identified all developed and undeveloped land in the major urban areas in Waimakariri District of Rangiora, Kaiapoi and Woodend/Pegasus. All undeveloped land has been inspected and development potential quantified. I have also completed analysis on historic section sales and new dwelling consent data in the respective townships. Section sale data has been obtained from the developers or real estate companies and base sale data was obtained from Property Guru, Valbiz and REINZ.

WAIMAKARIRI EXISTING RESIDENTIAL MARKET

Overview

- 14 The rezoning submission for the Site relates to the properties at 511, 531, 535 & 547 Mill Road and 290 & 344 Bradleys Road in Ōhoka which is currently proposed to be zoned Rural Lifestyle Zone (RLZ) in the proposed Waimakariri District Plan. The rezoning request provides for approximately 850 residential lots varying from 600 sqm to 3,300 sqm. In addition to the residential lots, the submission seeks to enable a commercial centre and options for a polo field with associated facilities, educational facilities and retirement village.
- 15 The proposed development will provide larger lot sizes than are currently offered in the major Waimakariri District townships where recent development is at a much higher density. Residential section purchasers requiring a section size greater than 500 sqm now have limited choice in Greater Christchurch and also in the rural townships.

Land Market

- 16 I have completed detailed analysis of the residential market in the three major urban townships of Waimakariri District. To provide context and to assist in understanding the nature of the market I have initially completed an analysis of the lot sizes throughout the major urban areas. I have then outlined analysis of residential section sales volume and price together with new dwelling building consent volume in the three major townships together with the surrounding inner North Canterbury rural district outside the major townships, but within the Greater Christchurch Partnership Urban Environment.
- 17 Table 1 and Figure 1 provides an analysis of lot sizes in the three major urban townships in Waimakariri District.

Waimakariri District Townships - Residential Lot Sizes								
Location	Rangiora		Kaiapoi		Woodend		Total Townships	
Lot Band Size	# Lots	%	# Lots	%	# Lots	%	# Lots	%
0	1,255	15.7%	705	12.7%	50	1.2%	2,010	11.4%
1-199			96	1.7%	25	0.6%	121	0.7%
200-299	64	0.8%	207	3.7%	81	2.0%	352	2.0%
300-399	207	2.6%	503	9.0%	329	8.2%	1,039	5.9%
400-499	298	3.7%	392	7.1%	993	24.7%	1,683	9.6%
500-599	310	3.9%	401	7.2%	549	13.6%	1,260	7.2%
600-699	2,176	27.2%	868	15.6%	735	18.3%	3,779	21.5%
700-799	1,424	17.8%	1,058	19.0%	381	9.5%	2,863	16.3%
800-899	825	10.3%	549	9.9%	330	8.2%	1,704	9.7%
900-999	509	6.4%	242	4.4%	160	4.0%	911	5.2%
1 000-1,249	480	6.0%	385	6.9%	152	3.8%	1,017	5.8%
1 250-1 499	147	1.8%	51	0.9%	40	1.0%	238	1.4%
1,500-2,999	234	2.9%	74	1.3%	154	3.8%	462	2.6%
3,000-4,999	37	0.5%	20	0.4%	22	0.5%	79	0.4%
5,000-7,499	17	0.2%	8	0.1%	11	0.3%	36	0.2%
7,500-9,999	16	0.2%	1	0.0%	10	0.2%	27	0.2%
Total	7,999	100.0%	5,560	100.0%	4,022	100.0%	17,581	100.0%

Source: RPNZ - CoreLogic

Table 1 – Lot sizes

Township - Lot Size Analysis

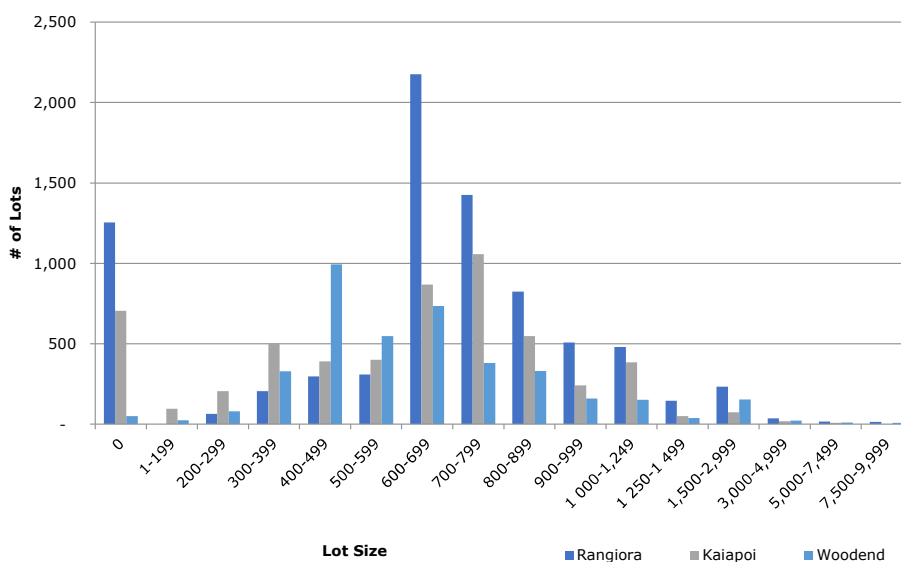


Figure 1 – Lot size analysis

- 18 Rangiora is the largest urban town in Waimakariri District with 7,999 residential properties, followed by Kaiapoi with 5,560 and Woodend with 4,022. In total there are 17,581 residential properties located in these three urban townships.
- 19 Within the three main urban towns there are 2,010 properties (11.4%) which relate to historic cross lease or unit title dwellings (flats) where because they have an undivided share or entitlement in the site, the land area is listed 0 sqm.
- 20 In Rangiora, which is the largest urban town and the most established with a significant proportion of land development and housing completed pre-2000, the majority of residential properties have a land area greater than 600 sqm. 5,414 lots (67.7% of the total) have a land area of between 600 – 1,249 sqm. Excluding

cross lease/unit title properties, 5,414 (80.3%) residential properties have a land area of between 600 – 1,249 sqm.

- 21 Kaiapoi, which is the second largest urban town, accommodates 5,560 residential properties of which 3,102 or 55.8% of the total have a land area of between 600 - 1,249 sqm. Excluding cross lease/unit title properties, 3,102 (63.9%) residential properties have a land area of between 600 – 1,249 sqm.
- 22 In Woodend, which includes the relatively modern subdivisions of Ravenswood and Pegasus, there is a higher proportion of properties in the smaller land area category. 1,758 properties out of a total of 4,022 or 43.7% have a land area of between 600 – 1,249 sqm. Excluding cross lease/unit title properties, 1,758 (44.3%) residential properties have a land area of between 600 – 1,249 sqm.
- 23 In summary, in the three main urban townships of Waimakariri District, where there are 17,581 residential properties, 10,274 (or 58.4%) of the total residential stock sits in the 600 – 1,249 sqm size band. Excluding cross lease/unit title properties, 10,274 (66.0%) residential properties have a land area of between 600 – 1,249 sqm.
- 24 Apart from Kaiapoi, which has two large comparatively modern subdivisions at Silverstream and Beachgrove and Woodend, which has two large comparatively modern subdivisions at Pegasus and Ravenswood, all of the other major urban townships in Waimakariri District have long established urban areas where up until recently residential development has historically been completed with traditional larger lots, hence the high proportion of properties greater than 600 sqm, especially in Rangiora (80.3%).
- 25 The relatively high proportion of properties with a land area greater than 600 sqm in the three major townships reflects existing developed housing stock, much of which was constructed pre 2000. Virtually all modern residential land development has been at a much higher density. Therefore, in the future there will be very limited supply of sections greater than 500 sqm.
- 26 I have also completed research on lot sizes in the western part of the District's Urban Environment, excluding the main townships of Rangiora, Kaiapoi and Woodend/Pegasus, which for the purposes of this evidence, includes the rural residential settlements of Ōhoka, Mandeville, Swannanoa, Eyreton and Clarkville. The following table provides an analysis of lot sizes in this area:

Location	SW Urban Environment	
	# of Lots	%
300 - 399	1	0.2%
900 - 999	1	0.2%
1000 - 1,249	4	0.7%
1,250 - 1,499	4	0.7%
1,500 - 2,999	26	4.5%
3,000 - 4,999	240	41.8%
5,000 - 7,499	147	25.6%
7,500 - 9,999	83	14.5%
1.0000 - 1.9999 ha	67	11.7%
2.0000 - 2.9999 ha	1	0.2%
Total	574	100.0%

Source RPNZ - Corelogic

- 27 Apart from one property which is in the 300 – 399 sqm category, all other properties are between 900 sqm – 2.9999 ha. There are 538 (93.7%) residential properties in the immediate environs of Ōhoka which have a land area between 3,000 – 9,999 sqm.
- 28 As illustrated in Table 2, I have completed lot size analysis on the five major active residential subdivisions in Waimakariri District. In all but Townsend Fields in Rangiora, the majority of residential sections are less than 500 sqm.

Section Sizes	#	<500 m ²	%
Bellgrove - Stage 1	199	143	71.9%
Townsend Fields	125	2	1.6%
Ravenswood - Stages 1 - 8	1,060	918	86.6%
Beachgrove - Stages 1 - 6	358	314	87.7%
Silverstream	803	693	86.3%

Table 2 – Section sizes

- 29 In Stage 1 of Bellgrove comprising 199 lots, 71.9% are less than 500 sqm. I understand that in the remaining stages of Bellgrove, there will be a higher density of development and a greater proportion of lots will be less than 500 sqm.
- 30 The above analysis is consistent with the modern style of residential subdivision completed in Greater Christchurch of higher density developments and accordingly smaller residential section sizes. Residential section purchasers requiring a section size greater than 500 sqm have limited choice in Greater Christchurch and also in the rural townships.
- 31 Rezoning the Site at Ōhoka will provide North Canterbury residents with a greater range of choice in terms of lot size and also location. It is highly unlikely that any new subdivisions in the existing three major urban townships in Waimakariri District will provide section sizes anywhere near the size proposed at Ōhoka.
- 32 I have completed research on the supply of residential sections in the Waimakariri District analysing the number of sales and new

dwelling building consents issued over the last 13 years. Table 3 provides an analysis of the number of vacant residential section sales and new dwelling building consents in the three major townships of Waimakariri District together with the area outside the major townships within the Greater Christchurch Partnership Urban Environment for the period from 2010 – 2022. This new dwelling building consent data excludes townhouse and apartment building consents.

Waimakariri District Townships & Non Urban - Sales & New Dwelling Building Consents

Location	Rangiora		Kaiapoi		Woodend		Total Townships		Non Urban		Total	
	Sales #	Building Consents #	Sales #	Building Consents #	Sales #	Building Consents #	Sales #	Building Consents #	Sales #	Building Consents #	Sales #	Building Consents #
2010	36	175	13	23	29	81	78	279		65	78	344
2011	220	211	194	79	189	93	603	383	42	39	645	422
2012	144	406	180	218	70	201	394	825	11	146	405	971
2013	148	394	228	300	127	226	503	920	31	177	534	1097
2014	108	273	228	255	105	142	441	670	13	107	454	777
2015	124	173	186	190	89	77	399	440	15	95	414	535
2016	144	177	162	148	94	66	400	391	23	56	423	447
2017	111	219	117	123	166	96	394	438	34	60	428	498
2018	151	231	70	94	262	176	483	501	25	70	508	571
2019	83	187	57	59	218	266	358	512	15	57	373	569
2020	122	145	132	58	397	241	651	444	17	50	668	494
2021	49	205	130	139	368	358	547	702	17	91	564	793
2022	21	113	30	157	85	339	136	609	8	76	144	685

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

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

Table 3 – Sales and consents

33 The information in Table 3 is shown Figure 2A & 2B below:

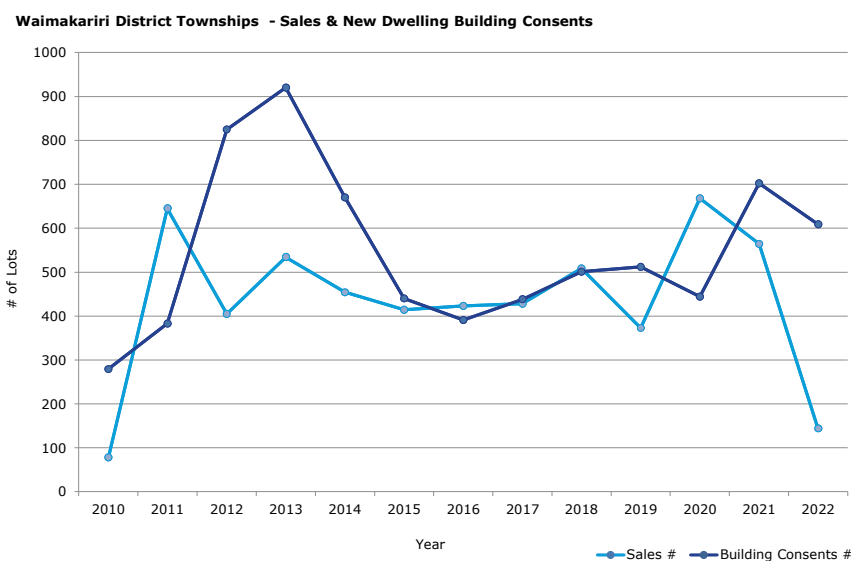
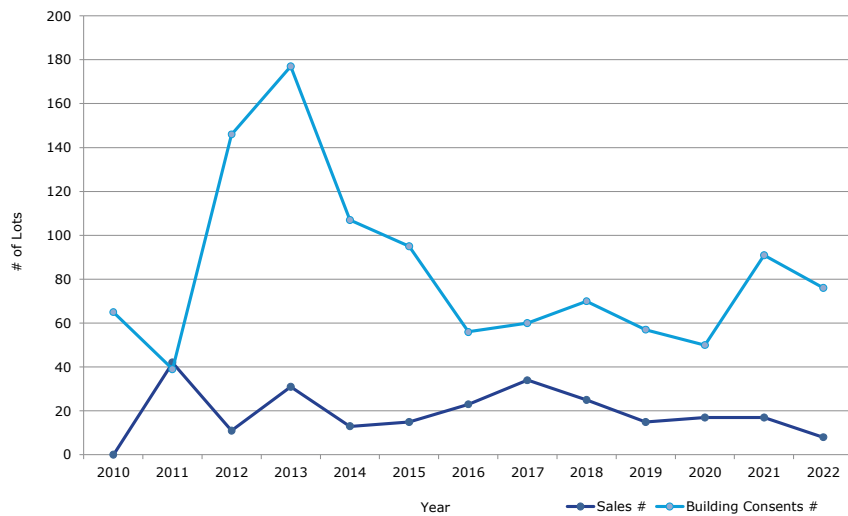


Figure 2A

Waimakariri District Non Urban - Sales & New Dwelling Building Consents



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

Figure 2B

- 34 The number of vacant residential section sales in the major townships has fluctuated over the last 13 years from a low in 2010 of 78 immediately following the Global Financial Crisis to a peak in 2020 of 651. During the period from 2011 - 2019, there was a relatively consistent pattern of volume in a range of between 358 – 603 sales per annum. The sub-peak of 603 sales in 2011 can be attributed to relocating red zone owners purchasing sections in Waimakariri District following the Canterbury earthquakes. In the 2019 – 2020 period, there was a sharp increase in sales volume from 358 to 651 which reflected the buoyant residential market at that time immediately following the COVID-19 lockdown. From 2021, there was a sharp decrease in volume resulting from initially constrained supply, but later the residential market corrected following significant interest rate rises.
- 35 The volume of sales is often a reflection of supply and demand. If supply is constrained, then this will affect volume. The decline in the volume of sales in 2021 was a result of constrained supply rather than a reflection of demand at that time. .
- 36 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. During the 11 year period from 2011-2021 there were 5,173 initial section sales or an average of 470 per annum. In the same period there were 6,226 new dwelling consents issued or an average of 566 per annum.
- 37 Analysis of the relationship between the volume of initial sales of vacant sections and new dwelling building consents in the rural districts surrounding the major townships but within the Greater Christchurch Partnership Urban Environment is challenging.

- 38 In the 13 year period there were 5,638 initial section sales and 8,203 new dwelling building consents.
- 39 Our vacant section sales data is limited to sections up to 5,000 sqm, whereas the new dwelling building consent data relates to all properties.
- 40 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.
- 41 Therefore, I consider the new dwelling consent data is a more accurate representation of housing demand.
- 42 Though not shown in the Table 3 above, in the Waimakariri District major townships the number of new dwelling consents in the eight month period in 2023 that we have data for (January – August) was 351, which extrapolated over a 12 month period equates to 526 (86.4% of the 2022 full year number of 609).
- 43 Table 4 below provides an analysis of the average vacant residential section sale price in the three major townships together with the area outside the major townships within the Greater Christchurch Partnership Urban Environment for the period from 2010 – 2023.

Waimakariri District Residential Average Area & Sale Price											
Location	Rangiora		Kaipoi		Woodend		Total Townships			Non Urban	
Year	Ave Lot Area	Sale Price	Ave Lot Area	Ave Sale Price	Ave Lot Area	Ave Sale Price	Ave Lot Area	Ave Sale Price	Ave Sale \$ / m²	Ave Lot Area	Ave Sale Price
2010	960	165,167	765	154,846	661	205,979	816.31	178,621	219	-	-
2011	777	167,269	717	162,609	633	174,048	712.92	167,890	235	3,993	224,552
2012	749	202,341	652	177,828	783	206,332	709.30	191,518	270	3,870	220,791
2013	808	222,435	574	163,796	700	218,424	673.34	194,372	289	4,309	234,333
2014	746	201,770	490	156,047	716	221,741	602.85	182,053	302	4,237	287,714
2015	804	183,303	542	176,753	723	204,648	661.39	184,709	279	4,382	234,833
2016	711	198,035	614	178,672	652	177,015	657.55	185,314	282	4,256	233,760
2017	664	189,636	656	190,151	707	171,045	679.67	181,930	268	4,134	245,618
2018	836	196,276	456	175,551	692	169,584	703.08	178,783	254	4,165	272,483
2019	690	210,859	437	180,252	670	177,029	637.61	185,352	291	3,957	304,278
2020	731	229,045	409	188,652	522	177,517	538.44	189,389	352	4,014	350,976
2021	678	333,715	423	232,248	533	241,155	522.00	247,401	474	2,740	339,271
2022	628	370,609	420	309,499	648	324,747	597.00	330,890	554	3,312	521,875
2023*	575	361,636	429	328,117	513	267,217	515.00	284,551	553	2,633	475,375

Sources : Valpak(Headway Systems Limited) *Part Year

* Part Year

Table 4 – Lot area/sale price

44 This same information is shown on Figure 3 which illustrates the sale price trend line in the three major townships and the surrounding area outside the townships.

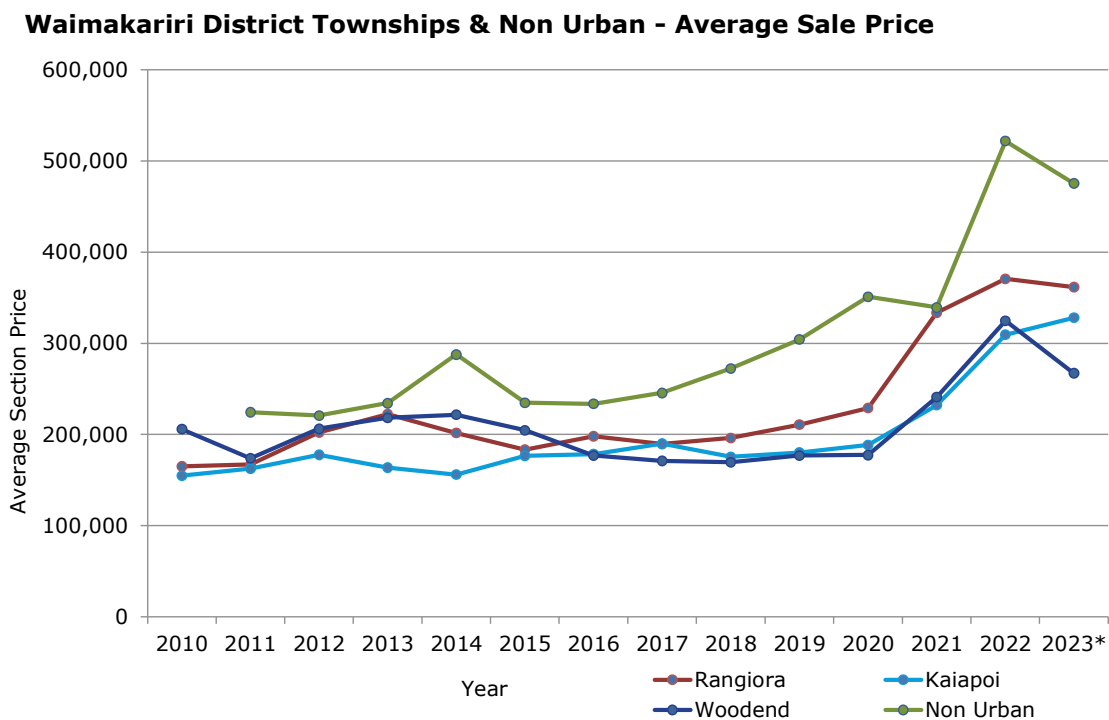


Figure 3

45 The above data is for titled sections only. The sales data for 2023 provides only part of the true picture of the current situation. Many sections sold in 2023 have not been constructed or titled and therefore this sale data has not been captured by the recorded data.

46 The average section sale price in all locations generally increased incrementally in the period from 2010 – 2020. From 2020, the average section sale price increased substantially. In Rangiora, the average section sale price increased from \$229,045 in 2020 to \$370,609 in 2022 (61.8%). In Kaiapoi, the average section sale price increased from \$188,652 in 2020 to \$309,499 in 2022 (64.0%) and in Woodend, the average section sale price increased from \$177,517 in 2020 to \$324,747 in 2022 (82.9%). In the surrounding area, outside the major townships, the average sale price increased from \$350,976 in 2020 to \$521,875 in 2022 (48.7%).

47 Figure 4 below plots the average land price per square metre (*psm*) in the three major urban townships of Waimakariri District

Major Waimakariri District Townships - Average Section Rate / m²

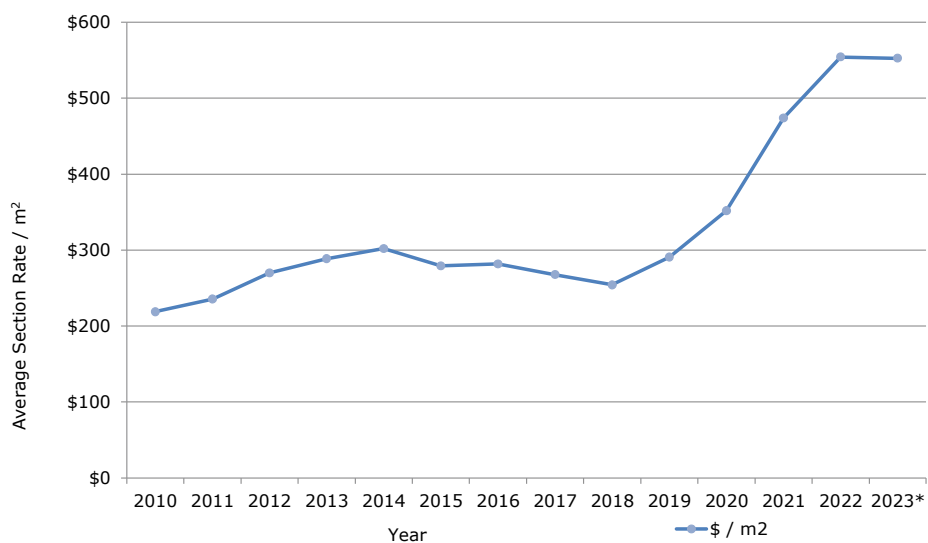


Figure 4

- 48 In the nine year period from 2010 – 2019 the average residential land value in the major townships increased from \$219 to \$291 psm, that being 33% or 4% per annum. In the four year period from 2019 – 2023 the average residential land value increased from \$291 to \$553 psm, that being 90% or 23% per annum.
- 49 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.
- 50 In some locations at that time, there were few or no vacant residential sections available which resulted in significant price escalation. For example, in the 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.
- 51 The substantial increase in residential land prices in this period in the Greater Christchurch area resulted from a mix of unprecedented demand fuelled by low interest rates and constrained supply where insufficient land was zoned and available for development. The level of increase in Greater Christchurch was influenced by the degree of constrained supply. For example, in Rolleston in 2021, there were virtually no sections available for sale and accordingly land prices increased by 140% in the space of 12 months. The situation in Waimakariri District and also Christchurch City was not as dramatic but limited supply still contributed to significant price escalation.

- 52 In 2021 there were numerous examples of entire stages in subdivisions in Greater Christchurch selling within hours of release. This occurred in a number of stage releases at Ravenswood.
- 53 In the June 2020 – December 2021 period, demand for residential sections in Greater Christchurch was unprecedented. The market 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 prior to titling in the face of strong competition from buyers for scarce product. In some instances, prices more than doubled after New Zealand emerged from the two COVID-19 lockdowns.
- 54 Changes in bank lending criteria due to the Credit Contract and Consumer Finance Act (CCCFA) at the end of 2021, increasing interest rates, shortage of building materials and a change in market sentiment, led to demand for residential property coming off its previous 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.
- 55 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 reduced greatly, and it is difficult to forecast when the market will return back to business as usual.
- 56 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. The downward price correction is likely to be between 10% and 20% or thereabouts.
- 57 Notwithstanding the recent drop in sale prices, current price levels are significantly higher than early 2021 which is at or around the time it became apparent that there was a severe shortage of residential sections in Greater Christchurch.

Waimakariri District's Western Urban Environment

- 58 I have completed analysis for the western part of the Waimakariri District's Urban Environment excluding the main townships of Rangiora, Kaiapoi and Woodend/Pegasus. However, it is difficult to accurately measure demand/supply in this area due to the relatively small sample of sales and the extremely limited supply. For example, in 2011, there were 42 sales but the average number of sales since, excluding 2023, is 14 per annum.

- 59 Notwithstanding this small sample size, it is notable that the average section sale price in the nine year period from 2011 – 2019 was \$251, 467, whereas in the period from 2019 until 2022, the average section sale price increased from \$308,563 to \$561,667 (60%).
- 60 This significant price escalation since 2019 reflects the constrained supply in this part of the District and the buoyant residential market at that time.

MARKET CAPACITY

Formative WCGM22 Development Model

- 61 Formative completed the Waimakariri Capacity and Growth Model 2022 (*WCGM22*) in 2022 on behalf of Waimakariri District Council (*WDC*).
- 62 This document formed part of the Section 42A documentation provided by WDC in PC31. Inovo reviewed the Formative WCGM22 Development Model on behalf of the applicant in PC31 (*Inovo Review*) concentrating on just the three main township areas of Rangiora, Kaiapoi and Woodend/Pegasus/Ravenswood. Colliers assisted Inovo in the validation of the WCGM22 Development Model which involved physical inspections of the sites to ground truth the data.
- 63 Attached at **Appendix 1** is a copy of the Inovo Review which outlines its methodology and findings. As a matter of clarification, a single household unit (*HHU*) refers to a developed section right through until the completion of the dwelling. Therefore all vacant sections and those sections where a dwelling is under construction and not completed are treated as new capacity in terms of this evidence and the WCGM22 model.
- 64 The Formative WCGM22 assessed medium term capacity within the Waimakariri urban environment of the three main townships (incorporating Rangiora, Kaiapoi, and Woodend/Pegasus) as being 5,934 HHU's. The Inovo Review following validation and ground truthing concluded a validated capacity of 4,361 HHU's. Therefore, Inovo concluded that Formative had over-stated the capacity by 1,573 HHU's. I note that given the scope of the Inovo Review at the time, it did not attempt to identify errors in supply outside the three main town areas or focus on any errors within the long-term. Given the errors identified within the three main townships, ground truthing and validation of capacity outside of the main towns and in the long term should be undertaken.
- 65 In light of the Inovo Review, the Hearing Panel Decision Report on PC31 concluded that the delivery of new housing within Waimakariri District is constrained by a number of factors thereby diminishing the development capacity which was assumed in the Formative

research. The Decision Report found that the applicant had successfully demonstrated that the WDC 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.

Post PC31 Review

- 66 In January 2024, the research team at Colliers re-inspected the relevant properties referenced in the WCGM22 and the Inovo Review, and updated those capacity figures to account for the number of dwellings formerly under construction which have now been completed.
- 67 Inspections in January 2024 revealed that the medium term capacity has reduced by 156 HHUs to a total of 4,205 HHUs. It is noted that of the 4,205 HHU capacity, there are a further 188 dwellings under construction on these lots which will further reduce capacity in the next 6 – 9 months by 188 HHUs.
- 68 Table 5 illustrates the updated medium term capacity which includes the original Formative WCGM22 capacity, the Inovo Review (validated capacity) and the updated Colliers capacity as at January 2024.

Updated WCGM22 Model Summary						
Location	WCGM22 Capacity	Validated Capacity	Difference in Capacity vs WCGM22	Colliers Updated Capacity Jan 2024	Updated Difference in Capacity	Vacant Lots Dwg Under Construction
Rangiora						
Bellgrove	952	800	-152	800		
Townsend Fields	419	370	-49	370		
Summerset Retirement Village	211	182	-29	182		
Flaxton Village	59	52	-7	52		
East Rangiora	76	66	-10	66		
Kaiapoi						
Beachgrove	332	330	-2	330		24
Silverstream	89	65	-24	65		
Future Silverstream	44	41	-3	41		
The Sterling	137	90	-47	90		
Momentum	116		-116			
Woodend/Pegasus						
Ravenswood	969	677	-292	581	-96	106
Freedom Lifestyle Village	131	114	-17	114		
Woodland Estate	104	75	-29	75		
Eders	42	45	3	45		
Parsonage/Gladstone North	148	119	-29	119		8
Gladstone South	18	73	55	73		
Pegasus	369	86	-283	49	-37	8
Vacant/Infill						
Rangiora Vacant Lots	379	248	-131	248		
Rangiora Infill	355	270	-85	270		
Kaiapoi Vacant Lots	277	174	-103	174		16
Kaiapoi Infill	292	273	-19	273		
Woodend/Pegasus Vacant Lots	413	209	-204	186	-23	26
Infill/Intensification	2	2		2		
Total Medium Term Household Capacity	5,934	4,361	-1,573	4,205	-156	188

Table 5 – Updated WCGM22

Medium Term Demand/Capacity Summary

Capacity

- 69 Accounting for the Inovo Review and the updated Colliers analysis, the adjusted medium term WCGM22 capacity is 4,205 HHU's.

Demand

- 70 Analysis of the average number of residential section sales in major townships in Waimakariri District of Rangiora, Kaiapoi and Woodend/Pegasus over the 11 year period from 2011 – 2021 indicated an average of 470 per annum, and over the five year period from 2017 – 2021, the average number of residential section sales was 487 per annum.
- 71 Analysis of the new dwelling consent data over the same 11 year period in the major townships equates to 566 per annum and over the same five year period, 519 per annum.
- 72 As outlined earlier in my evidence, I consider the new dwelling consent data is a more accurate representation of housing supply/demand than the number of initial section sales.
- 73 For the purposes of my analysis, I have adopted a demand of 518 dwellings per annum, prior to adding a competitive margin allowance, being a mid point between sales and building consent metrics, which equates to 5,180 dwellings in the 10 year medium term.
- 74 The WCGM22 assessed the medium term dwelling demand plus competitive margin in the WDC Urban Environment at 4,970 HHU's and the long term demand plus margin at 11,700 HHU's.
- 75 The NPS-UD requires Councils to include a competitive margin which is an additional buffer above the demand of 20% in the medium term. Adopting my medium term estimated demand of 5,180 dwellings, this would mean that the WDC needs to provide a capacity of at least 6,216 HHU's including a competitive margin.
- 76 My medium term demand estimate plus margin of 6,216 HHU's is higher (25.1%) than the WCGM22 demand assessment of 4,970 HHU's. My medium term demand plus margin is also significantly higher (47.8%) than the updated WCGM22 capacity (i.e. the capacity that accounts for Inovo Review and updated Colliers analysis) of 4,205 HHU's.
- 77 Therefore, adopting the updated WCGM22 medium term capacity of 4,205 HHUs, there is a shortfall of 2,011 HHUs over the medium term.

- 78 Adopting my current medium term demand including the competitive margin of 6,216 HHUs or 622 HHUs per annum indicates that the current medium term capacity in the major townships will be exhausted in just under seven years.

Additional Capacity for the Long Term – New Development Areas

- 79 Significant areas of land which are identified as being potentially suitable for future urban development subject to more detailed evaluation are identified as New Development Areas (NDAs) in Rangiora. Large blocks are located on the north eastern, south eastern and south western periphery of the township.
- 80 The WCGM22 Development Model counts NDAs as long term capacity. With the exception of Stages 2-5 of Bellgrove and the undeveloped Townsend Fields land, the model excludes most of the unzoned NDA land in Rangiora and Kaiapoi for the medium term.
- 81 As such, I have considered whether and to what extent these excluded NDAs would provide additional capacity over the long term.
- 82 In quantifying the potential capacity in the NDAs, I have excluded land that is in public ownership for either education or stormwater retention purposes together with land that is clearly unlikely to be feasibly developed for residential purposes such as the Lamb & Hayward Funeral Directors' property in Kippenberger Avenue, Rangiora.
- 83 Land designated NDA on the northern edge of the Bellgrove subdivision and in part of the Townsend Fields subdivision is NDA although it is zoned for residential purposes in the PDP. As set out above, Stages 2-5 at Bellgrove (located to the north of Stage 1) and the undeveloped Townsend Fields land are incorporated in the medium term WCGM22. Therefore, I have excluded Stages 2-5 at Bellgrove and the undeveloped land at Townsend Fields from the long term capacity analysis below.
- 84 In arriving at an appropriate housing capacity land yield, I have adopted the following approaches:
- 84.1 adopted yields in publicly available and consented subdivision master plans or plan change documents; or otherwise
 - 84.2 where a site contains a substantial existing dwelling I have deducted a curtilage area of between 0.20 – 0.25 ha to allow for its retention; and
 - 84.3 deducted 12.5% of the gross site area for stormwater management and 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, Our Space, the Greater Christchurch Housing Development Capacity (July 2021), the Greater Christchurch Development Capacity Assessment (March 2023), and the Independent Review of Greenfield Density commissioned by the Greater Christchurch Partnership and undertaken by Harrison Grierson Limited (February 2021). It allows to some extent the greater capacity enabled by the Medium Density Residential Standards (*MDRS*).

- 85 I have departed from the above approach in relation to High Flood Hazard land where the yield has been reduced to 12 HHUs/ha, to reflect the likelihood that a greater area of land will be required for stormwater management (in the event it is able to be developed).
- 86 Where there is a publicly available and consented subdivision master plan I have adopted the actual lot number. This was the case with Stage B-D at Bellgrove, which is separate and dislocated from Stages 1 and 2 – 5 and located on the opposite side of Kippenberger Avenue. In all other cases I have converted the land area (following dwelling curtilage allowance, if required) by deducting 12.5% for stormwater management and dividing the net area by the appropriate lot yield.
- 87 In Rangiora, there is a net area of approximately 200 ha within NDAs which adopting either actual yields or calculated yields equates to a housing capacity of about 3,021 HHUs.
- 88 In Kaiapoi, there is net area of approximately 79.2 ha identified within the NDAs located on the north eastern edge of the township at 310 Beach Road with the balance located east of the Sovereign Palms subdivision in the vicinity of Lees Road and Clifford Road. Out of a total of 79.2 ha, 71.6 ha of this land is under the Christchurch International Airport 50 dBA Ldn Operative and Remodelled Air Noise Contours which therefore reduces the total unaffected NDA area to about 7.6 ha or 91 HHUs. Through its submission on the PDP, Christchurch International Airport Limited (*CIAL*) has opposed any new residential development in areas located under those Contours.
- 89 I also note that 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.
- 90 These matters present potentially significant constraints on the ability to realise development capacity from those NDAs. For that reason, while I have noted that capacity in Table 6 (for completeness), I have not accounted for it as part of my assessment of the potential supply. I have however included the residual area of 7.6 ha, which is outside the Remodelled Contours 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.

- 91 The following is a summary of the land in the NDA areas which is considered to have long term residential development potential, with the properties in piecemeal ownership amalgamated within each geographic area.

Waimakariri - New Development Areas				
Townships	Gross Area ha	Net ha	HHA's per ha	Potential HHA's
Rangiora				
Bellgrove - Stage 2 - 5				Zoned PDP
Bellgrove Stage B - D	31.1	27.2	Plan	425
Townsend Fields Development				Zoned PDP
FDA - Potential - (51)	203.1	172.8	15	2,596
Sub Total	234.2	200.0		3,021
Kaiapoi				
310 Beach Road - Inside NCL	6.0	5.3	12	63
Cliffords Road - Outside NCL	8.7	7.6	12	91
Cliffords Road - Inside NCL	75.8	66.3	12	795
Sub Total	90.5	79.2		949
Total	324.8	279.2		3,970

Table 6

CAPACITY SUMMARY

- 92 Table 7 summarises the overall situation in the main townships of Waimakariri District in Rangiora, Kaiapoi and Woodend/Pegasus, with the updated WCGM22 capacity of 4,205 HHUs deemed to be short-medium term and the residual NDA land (excluding the Bellgrove and Townsend Fields components) deemed to be long term.

Consolidated Summary	
Category	Capacity HHU's
Updated WCGM22 Model	4,205
NDA Areas	3,970
Total	8,175
Less Kaiapoi Land impacted inside the Remodelled Contour	(858)
Net Total Capacity	7,317

Table 7

MDRS

- 93 I have considered the likely market impact that the new MDRS will have on the Waimakariri District.
- 94 One of the key attractions of inner North Canterbury is the low density rural environment where there are few double storey 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 that this situation is unlikely to change in the foreseeable future.

- 95 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.
- 96 MDRS will result in some higher density residential development in the Waimakariri District; however in my opinion in the medium term this will be relatively limited. It is likely that it will be little more than what has occurred in specific higher density areas within modern subdivisions such as has occurred in Silverstream, Beachgrove and Pegasus together with central Rangiora. Examples of this form of development include Silverstream where two storey terraced housing is constructed on sites comprising 100-300 sqm, in Beachgrove where two storey terrace houses have been constructed on lots of 168 sqm, at Pegasus where two storey terrace houses have been constructed on lots between 150-250 sqm, and at Bellgrove – Stage 1, 200-300 sqm lots are being developed.
- 97 All of these developments predate the MDRS and form a standard component of modern subdivision development.
- 98 The WCGM22 allows for MDRS feasible capacity in the medium term. Allowance for further MDRS capacity in terms of infill is provided for in the long term WCGM22.
- 99 PWC prepared a report for Ministry of Environment dated 14 July 2022 named 'The Medium Density Residential Standards under the Resource Management Act – Estimates of development impacts at Statistical Area 2 level'. The purpose of this report was to provide a spatial estimate of the development impacts of MDRS.
- 100 The report provided estimates of the additional new dwelling consents in residential areas subject to MDRS policy during the 5 to 8 years following policy enactment for various local authority areas in New Zealand. Additional dwellings are defined as those dwellings over and above what would be expected to have otherwise occurred without MDRS.
- 101 For Waimakariri District, the mean impact over a 5 to 8 year period was an additional 269 dwellings and in the case of the median impact, 255 dwellings.
- 102 Therefore, the PWC report estimates a very low uptake over 5 – 8 years which is essentially in the medium term.

- 103 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.
- 104 Formative concluded that the 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. I generally agree with that conclusion.

CONCLUSION

- 105 Rezoning the Site will enable a new residential subdivision for provision of approximately 850 lots of varying size from 600 sqm to 3,300 sqm. The proposed rezoning will provide purchasers with a greater range of option and choice of larger lot sizes than are offered in the major Waimakariri District townships and the urban areas of Greater Christchurch.
- 106 One of the key attractions of inner North Canterbury is the low density rural environment where there are few double storey 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 that this situation is unlikely to change in the foreseeable future
- 107 The western part of the district’s urban environment is a desirable location for purchasers who require a large section in an existing urban area due to its proximity to Christchurch City, Christchurch International Airport and the surrounding main townships of Rangiora, Kaiapoi and Woodend/Pegasus. Vacant large sections in the surrounding major townships are simply no longer available with all existing and proposed development providing sections less than 500 sqm and more likely in the 350 – 450 sqm range. Therefore, Rangiora, Kaiapoi and Woodend/Pegasus are not an option as a supply substitute to Ōhoka and the adjoining rural residential settlements.
- 108 The current medium term capacity as measured by the updated WCGM22 of 4,205 HHUs is less than my forecast demand of 5,180 HHUs which increases to 6,216 HHUs when the competitive margin is added.
- 109 Adopting my current medium term demand including the competitive margin of 6,216 HHUs or 622 HHUs per annum indicates that the current medium term capacity will be exhausted in just under seven years.

- 110 In order to meet the NPS-UD requirements to provide at least sufficient development capacity over the medium and long term, additional land needs to be rezoned as a matter of urgency.
- 111 Formative concluded that the 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. I generally agree with that conclusion.

Dated: 5 March 2024

Gary Sellars

APPENDIX 1

Review of Formative WCGM22 Development Model

EXECUTIVE SUMMARY

The following summarises the findings from our review and validation of the household capacities set out in the WCGM22 model and relied on by Mr Yeoman. That review has included desktop / GIS analysis of the WCGM22 and physical inspections of sites.

METHODOLOGY

Our review of the WCGM22 has entailed desktop analysis and physical inspections of areas and sites in order to confirm or revise the assumed housing capacities, as follows:

DESKTOP REVIEW

Firstly, GIS was used to identify any of the following areas that cannot be developed or intensified in a way that provides additional residential capacity:

- Recreation Reserve Lots
- Utility Reserve Lots
- Council Owned Facilities (i.e. water treatment plants)
- Parcels featuring heritage buildings
- Parcels featuring protected trees
- Pre-Schools/early learning centres
- Churches/Places of Worship.
- Land covenants and/or encumbrances that prevent further subdivision or intensification
- Land where a dwelling had been completed therefore removing any potential future capacity in the medium term

Secondly, the household capacity stated in the WCGM22 in Greenfield areas was reviewed and validated, by either:

- Adopting yields in publicly available and consented subdivision master plans, or otherwise
- Deducting 12.5% of the gross site area for stormwater management, and then multiplying the remaining area by 15 houses/hectare applied to determine capacity (in accordance with the definition of 'net density' in the CRPS).

PHYSICAL REVIEW AND 'GROUND TRUTHING'

Following the GIS analysis described above, physical inspections of sites and areas in the District were then undertaken (in the week of 21 August 2023) in order to validate findings and provide real time / current information on the potential future capacity of land. In undertaking those site inspections, particular attention was given to:

- Land identified as vacant, that has since been developed, completed and occupied (and cannot provide capacity);
- Land identified as vacant, that has been partially developed and appears incomplete and/or unoccupied (and can therefore provide capacity);
- Land identified as providing capacity by way of infill, that has attributes indicating such infill is unlikely to materialise (e.g. building position, lifestyle properties with areas of open space that appear unlikely to be developed, other site specific or environmental attributes indicating infill unlikely).
- Land where capacity has been underestimated.

Photographic examples of the above are included in **Appendix A**.

RESULTS

The table below summarises the results of the analysis described above:

Location	WCGM 22 Capacity	Method of validating capacity:		Difference in Capacity (vs WCGM22)
		Capacity (per master plan)	Capacity (gross -12.5% x 15hh/ha)	
Rangiora:				
Bellgrove	952		800	-152
Townsend Fields	419		370	-49
Summerset Retirement Village	211		182	-29
Flaxton Village	59		52	-7
East Rangiora	76		66	-10
Kaiapoi:				
Beach Grove	332	330		-2
Silver Stream	89		65	-24
Future Silver Stream	44		41	-3
The Sterling	137		90	-47
Momentum	116		0 (not med term)	-116
Woodend/Pegasus:				
Ravenswood	969	677		-292
Commons Lifestyle Village	131		114	-17
Woodland Estate	104	75		-29
Eders	42		45	+3
Pegasus	369	86		-283
Parsonage/Gladstone Road	148		119	-29
Gladstone South	18		73	+55
Vacant/Infill	WCGM 22 Capacity	Validated Capacity		Difference in Capacity (vs WCGM22)
Rangiora Vacant lots	379	248		-131
Rangiora infill	355	270		-85
Kaiapoi Vacant lots	277	174		-103
Kaiapoi infill	292	273		-19
Woodend/Pegasus Vacant lots	413	209		-204
Infill /intensification	2	2		0
Total	5934	4361		-1573

CONCLUSION

In summary, this analysis finds that:

- Actual household capacity is approximately 4361 households, this 1573 households less than the corresponding total in the WCGM22.
- This conclusion potentially underestimates the shortfall insofar that feasible yield from infill lots (lot shape), economic benefit from the existing dwelling values, ability to develop to the densities in WCGM22 due to downstream constraints (i.e. existing infrastructure network constraints constraining development) has not yet been considered in my review. This model potentially underestimates the supply insofar that some developers may achieve higher yields than 15 houses/hectare and the WCGM22 Model may have missed some lots as was found with a very small number missed in Pegasus. However, such variance is unlikely to materially alter the conclusion above that the WCGM22 model overstates household capacity.

The appendices provide further detailed information underpinning the summary and conclusions above, as follows:

- **Appendix A | Photographic Examples of Sites;**
- **Appendix B | Detailed Methodology and Findings**
- **Appendix C | Land Covenant Examples**

Chris Sexton
Civil Engineer
B.E.(Hons.), MEngNZ

Appendix A | Photographic Examples of Sites



Figure 1 - Houses Already Constructed in Townsend Fields Rangiora



Figure 2- Rangiora Housing New Zealand Multi Lot Development (High Street)



Figure 3 - Houses Built within Mike Greer Development in Pegasus



Figure 4 - Developed Lots within Ravenswood



Figure 5 - Completed Houses within Woodland Estate



Figure 6 - Completed Houses in Beach Grove Subdivision - Kaiapoi

Appendix B | Detailed Methodology and Findings

1 Introduction

This memo outlines the findings of a further investigation into the WCGM22 model as developed by Formative as part of their economic assessment for the Waimakariri District. Further investigation of the model focused mainly on areas identified in the Medium Term due to the Mill Road Plan Change PC31 aiming to provide housing capacity within the medium term. The National Policy Statement Urban Development (NPS-UD) requires that Territorial Local Authorities (Councils) are to ensure that a sufficient number of land parcels are available as future development to ensure that a competitive margin is maintained (objective 2). The Ministry of Housing and Urban Development has provided the following guidance in terms of the NPS-UD:

Ensuring sufficient development capacity helps keep urban environments affordable and competitive. HBAs contribute to objective 2 by quantifying the future development capacity for expected housing demand by type and location, which informs housing bottom lines (clause 3.6). Competitive margins are added to demand forecasts to enable more competitive land and development markets, giving an overall housing bottom line (clause 3.6). Market indicators must be used to analyse how planning and infrastructure decisions support housing affordability for different community groups and provide for competitive housing markets. Clause 3.27(3) also requires that any undersupply of development capacity (and the reasons for this) are identified, so they can be addressed.

2 Methodology

The WCGM22 data was analysed in QGIS and combined with other open source data to provide further information. This included matching the ID's with the LINZ Data Service Primary Parcel Dataset allowing further information such as address, parcel appellation, title reference, legal owner etc to be included.

The WCGM22 data was then analysed to check for the following:

- Recreation Reserve Lots
- Utility Reserve Lots
- Council Owned Facilities (i.e. water treatment plants)
- Parcels featuring heritage buildings
- Parcels featuring protected trees
- Pre-Schools/early learning centres
- Churches/Places of Worship.

A number of areas were then checked for land covenants and/or encumbrances that would prevent further subdivision or intensification. Examples of these can be found in Appendix C for Ravenswood, Townsend Fields, Pegasus and Mansfield Drive.

Vacant lots were identified in the WCGM22 dataset as lots with 0 buildings on the parcels. These vacant lots were then checked to see if they are still vacant. This was initially done using the latest aerial imagery flown in early 2023 over the urban areas by Waimakariri District Council/ECan.

Vacant lots were then verified by driving the district and confirming if the sites were vacant or if a dwelling had been completed therefore removing any potential future capacity in the medium term. Dwellings under construction were also noted in areas where there were no restrictive covenants as these were seen to provide only a single housing unit in the medium term rather than multiple.

Greenfield Development was identified by Mr Yeoman as being the following:

- A) Bellgrove
- B) Townsend Fields
- C) Summerset Retirement Village
- D) Flaxton Village
- E) East Rangiora
- F) Beach Grove

- G) Silver Stream & Future Silver Stream
- H) The Sterling
- I) Momentum
- J) Ravenswood
- K) Commons Lifestyle Village
- L) Woodland Estate
- M) Eders
- N) Pegasus

Along with:

Parsonage/Gladstone Road
Gladstone South

These subdivisions don't necessarily match the names assigned by the developers and the areas identified in Mr Yeomans response to Minute 5 by the Commissioners.

For areas A-N where there were bulk vacant lots, these were assessed by using the following methodology. For sites where a subdivision master plan was publicly available that had been consented then this was adopted as the yield for the subdivision. For all other subdivisions, first an allowance of 12.5% of the site area was removed for stormwater management, with a density of 15 houses/hectare applied over the remaining area to come up with a projected yield.

2.1 Rangiora

2.1.1 Area A – Bellgrove

No master plan for the entire Bellgrove development could be found that was publicly available. The predicted yield for Bellgrove was calculated using the net site area (61.0 ha), minus a 12.5% allowance for stormwater management and allowing for 15 houses per hectare over the remainder of the site. This resulted in a predicted yield of 800 lots, 152 less than WCGM22 predicted in the medium term.

2.1.2 Area B – Townsend Fields

No master plan for the area identified as Townsend Fields within Mr Yeomans Maps could be found that was publicly available. The predicted yield for the area identified as Townsend Fields was calculated using the net site area (28.2 ha), minus a 12.5% allowance for stormwater management and allowing for 15 houses per hectare over the remainder of the site. This resulted in a predicted yield of 370 lots, 49 less than WCGM22 predicted in the medium term.

2.1.3 Area C – Summerset Retirement Village

Mr Yeoman clarified within his response to Minute 5 that WCGM22 considered retirement villages, although not at their ultimate yield, but instead as the yield that would be realised under normal development. This approach has been taken when assessing these areas, with the same methodology used as when assessing greenfield sites with a 12.5% allowance made for stormwater treatment. This resulted in a predicted yield of 182 lots on the Summerset Retirement Village site as identified by Mr Yeoman in his Maps attached to his response to Minute 5. This result is 29 lots less than originally predicted by WCGM22.

2.1.4 Area D – Flaxton Village

Mr Yeoman clarified within his response to Minute 5 that WCGM22 considered retirement villages, although not at their ultimate yield, but instead as the yield that would be realised under normal development. This approach has been taken when assessing these areas, with the same methodology used as when assessing greenfield sites with a 12.5% allowance made for stormwater treatment. This resulted in a predicted yield of 52 lots on the Flaxton Village site as identified by Mr Yeoman in his Maps attached to his response to Minute 5. This result is 7 lots less than originally predicted by WCGM22.

2.1.5 Area E – East Rangiora

No master plan for the area identified as East Rangiora within Mr Yeomans Maps could be found that was publicly available. The predicted yield for the area identified as East Rangiora was calculated using the net site area (5.1 ha), minus a 12.5% allowance for stormwater management and allowing for 15 houses per hectare over the remainder of the site. This resulted in a predicted yield of 66 lots, 10 less than WCGM22 predicted in the medium term.

2.1.6 Vacant Lots

Vacant Lots were identified as lots with 0 buildings on them in the WCGM22 model. A number of these lots were found to have houses or buildings already on them due to buildings being constructed over multiple parcels. It was also found that a number of lots within new subdivisions had been included such as the Townsend Fields Development. Lots within this subdivision are subject to restrictive covenants that prevent further subdivision of the land. WCGM22 had identified a number of these lots as being able to provide 2 or more additional lots in the medium term. This, along with the fact that a majority of these parcels now have dwellings completed on them further reduces the capacity available in the medium term as it has already been realised.

WCGM22 featured multiple utility reserves (stormwater basins) and recreation reserves in the vacant land category.

Vacant lots were verified by first reviewing aerial imagery flown at the beginning of 2023 by the Waimakariri District Council to identify if a dwelling had been constructed on the remaining viable vacant sites. This was then confirmed by visiting the sites to confirm the buildings had been completed along with checking to see if any additional lots had completed buildings on them since the aerial imagery was flown.

This resulted in a vacant lot yield of 248 lots within Rangiora, 131 lots less than originally predicted by WCGM22.

2.1.7 Infill/Intensification

It was assumed that infill/intensification would include lots that had 1 or more building on them within the WCGM22 model and were not included within the identified subdivisions. A number of lots were identified in the WCGM22 model that had been included in error. These lots were identified on the following criteria:

- Pre-Schools
- Lots already Developed

Some examples of these errors include the Kāinga Ora high density development built in 2019 on High Street/White Street in Rangiora, The Pre School at 62 Percival Street, the existing Holmwood retirement village in Rangiora (village built over multiple parcels).

These errors resulted in the total available amount of lots available for infill/intensification within Rangiora being 270, a reduction of 85 lots from the original WCGM22 model.

2.2 Kaiapoi

2.2.1 Area F – Beach Grove

The area identified as Beach Grove in WCGM22 as identified by Mr Yeoman within his response to Minute 5 when referenced back to the master plan for Beach Grove results in a future yield of 330 residential lots. This is 2 lots lower than that predicted by WCGM22. The reason for the small difference is due to the fact that Beach Grove has a higher density than most other residential subdivisions within the Waimakariri District, along with the required area for stormwater management being far smaller due to the works undertaken by Waimakariri District Council to construct a stormwater pump station at the end of Macintosh Drain, removing attenuation requirements for the development.

2.2.2 Area G - Silver Stream

No master plan for the area identified as East Rangiora within Mr Yeomans Maps could be found that was publicly available. The predicted yield for the area identified as East Rangiora was calculated using the net site area (5.0 ha), minus a 12.5% allowance for stormwater management and allowing for 15 houses per hectare over the remainder of the site. This resulted in a predicted yield of 65 lots, 24 less than WCGM22 predicted in the medium term.

2.2.3 Future Silver Stream

No master plan for the area identified as East Rangiora within Mr Yeomans Maps could be found that was publicly available. The predicted yield for the area identified as East Rangiora was calculated using the net site area (3.13 ha), minus a 12.5% allowance for stormwater management and allowing for 15 houses per hectare over the remainder of the site. This resulted in a predicted yield of 41 lots, 3 less than WCGM22 predicted in the medium term.

2.2.4 Area H – The Sterling

Mr Yeoman clarified within his response to Minute 5 that WCGM22 considered retirement villages, although not at their ultimate yield, but instead as the yield that would be realised under normal development. This approach has been taken when assessing these areas, with the same methodology used as when assessing greenfield sites with a 12.5% allowance made for stormwater treatment. This resulted in a predicted yield of 90 lots on The Sterling site as identified by Mr Yeoman in his Maps attached to his response to Minute 5. This result is 47 lots less than originally predicted by WCGM22.

2.2.5 Area I – Momentum

Mr Yeoman mentioned that Future Development/New Development areas as identified by Waimakariri District Council should not be included in the medium term, and instead be included as long term yield. The Momentum site as identified by Mr Yeoman in his response to Minute 5 and within WCGM22 shows that the site has been identified as proposing medium term development capacity. This site is zoned as Rural in the current operative district plan, and also zoned as rural lifestyle zone in the proposed district plan. It is based upon these reasons that this site has been excluded from the medium term. This site also falls within the Airport Noise Contour and is covered by High Flood Hazard, both qualifying matters in regards to the MDRS. This results in an overestimation by WCGM22 of 116 lots within the medium term.

2.2.6 Vacant Lots

Vacant Lots were identified as lots with 0 buildings on them in the WCGM22 model. A number of these lots were found to have houses or buildings already on them. A majority of the vacant lots were found to be within the Beach Grove Subdivision (outside of area F).

WCGM22 featured multiple utility reserves (wastewater pump stations) and recreation reserves in the vacant land category.

Vacant lots were verified by first reviewing aerial imagery flown at the beginning of 2023 by the Waimakariri District Council to identify if a dwelling had been constructed on the remaining viable vacant sites. This was then confirmed by visiting the sites to confirm the buildings had been completed along with checking to see if any additional lots had completed buildings on them since the aerial imagery was flown.

The vacant lot housing capacity was found to be 174 within Kaiapoi, 103 less than predicted by WCGM22.

2.2.7 Infill/Intensification

It was assumed that infill/intensification would include lots that had 1 or more building on them within the WCGM22 model and were not included within the identified subdivisions. A number of lots were identified in the WCGM22 model that had been included in error. These lots were identified on the following criteria:

- Pre-Schools
- Lots already Developed
- Lots with restrictive covenants/encumbrances preventing intensification and/or further subdivision
- Lots featuring buildings with heritage status
- Lots featuring protected trees
- Housing New Zealand Multi Lot Residential Developments
- Churches/places of worship
- Council owned utilities (water treatment plants etc.)

Some examples of these errors include the Kaiapoi Congregation of Jehovah's Witnesses, the Church Street Water Supply headworks, Peraki Street Wastewater Pump Station, The Pre School at 58 Williams Street and houses within the Mansfield Drive development that feature encumbrances that prevent further subdivision and intensification.

These errors resulted in the total available amount of lots available for infill/intensification within Kaiapoi being 273, a reduction of 19 lots from the original WCGM22 model.

2.3 Woodend-Pegasus

2.3.1 Area J – Ravenswood

The area identified as Ravenswood in WCGM22 included the commercial areas of Ravenswood that were rezoned as part of Plan Change 30 that was notified in November 2020 and became operative on 26 June 2023. This resulted in 12.8 hectares of land being rezoned from Residential 6a to Business 1 within the Ravenswood Development. The available yield within area A as identified by Mr Yeoman within his response to Minute 5 when referenced back to the master plan for Ravenswood results in a future yield of 703 residential lots. This is 266 lots lower than that predicted by WCGM22 due to the removal of the commercial areas, along with the slightly lower density achieved over Stages 5 and 6 compared to what WCGM22 predicted.

On site validation found that 26 of these lots have since had houses been completed on them, further reducing the available capacity that WCGM22 predicts. This results in the figure of the number of available housing units within this area to 677, a reduction of 292 from the original WCGM22 prediction.

2.3.2 Area K – Commons Lifestyle Village

Mr Yeoman clarified within his response to Minute 5 that WCGM22 considered retirement villages, although not at their ultimate yield, but instead as the yield that would be realised under normal development. This approach has been taken when assessing these areas, with the same methodology used as when assessing greenfield sites with a 12.5% allowance made for stormwater treatment. This resulted in a predicted yield of 114 lots on the Commons Lifestyle Village site as identified by Mr Yeoman in his Maps attached to his response to Minute 5. This result is 17 lots less than originally predicted by WCGM22.

2.3.3 Area L – Woodland Estate

The master plan for the Woodland Estate development was available online. Mr Yeoman has identified the Woodland Estate Subdivision as being Stage 3 based upon the map he provided in his response to Minute 5. The yield from Stage 3 is found to be 75 lots. This is lower than WCGM22 by 29 lots. Woodland Estate Stage 3 will have its stormwater managed in the downstream stormwater management area as constructed as part of the earlier stage. This stormwater management area also makes allowance for Area M – Eders as identified by Mr Yeoman.

2.3.4 Area M – Eders

As mentioned above, this area will have its stormwater managed by the downstream stormwater management area, this means that a density of 15 houses/hectare has been applied over the site. This results in a yield of 45 lots, 3 more than predicted by WCGM22.

It should be noted that a dwelling has been constructed on this site and completed at the beginning of 2023. This dwelling has a floor area of 320m² and may impact the potential yield from the site due to the dwellings location and size. This has not been considered in either assessment.

2.3.5 Parsonage/Gladstone Road

This area identified by Mr Yeoman in his maps attached to his response to Minute 5 relates to the lots identified in WCGM22 between Parsonage Road and Eders Road. This is a total of 9.07ha, when considering a density of 15 houses/hectare after a 12.5% allowance for stormwater management has been accounted for this results in a predicted yield of 119 lots. The WCGM22 model predicted a number of 101 lots within this area (when referring to the mapped area presented in Appendix 1 of Mr Yeomans response to Minute 5). This estimated yield is 28 lots more than WCGM22 predicts.

2.3.6 Gladstone South

This area identified by Mr Yeoman in his maps attached to his response to Minute 5 relates to the lots identified in WCGM22 between Eders Road and Gladstone Road. This is a total of 5.57ha, when considering a density of 15 houses/hectare after a 12.5% allowance for stormwater management has been accounted for this results in a predicted yield of 73 lots. The WCGM22 model predicted a number of 65 lots within this area (when referring to the mapped area presented in Appendix 1 of Mr Yeomans response to Minute 5). This estimated yield is 8 lots more than WCGM22 predicts.

2.3.7 Area N – Pegasus

The area identified as Pegasus in Mr Yeomans Map was easily identified in the WCGM22 data. It was found through assessment of the lots within this area, a number of lots had been developed with houses completed already. There was also a reserve identified in this area. The larger of the areas identified within Pegasus is

the Mike Greer development. The WCGM22 model predicted a yield of 85 lots from this development alone. This development is nearing completion with most of the dwellings already completed and occupied.

The Maps provided by Mr Yeoman identified a number of lots on Lakeside as being included in the “Pegasus” subdivision area N. Reviewing the raw model data and historic parcel ID’s (Parcel ID’s are updated if a lot is subdivided) there was no match found for these lots within WCGM22. This was included in our assessment and resulted in an additional 16 allotments being included that had been missed.

The total number of available lots (lots not being developed with completed houses) was found to be XX lots. This was found to be significantly lower than that predicted by WCGM22.

2.3.8 Vacant Lots

Vacant Lots were identified as lots with 0 buildings on them in the WCGM22 model. A number of these lots were found to have houses or buildings already on them. It was also found that a number of lots had been included that are subject to restrictive covenants that prevent further subdivision of the land. WCGM22 had identified a number of these lots as being able to provide 2 or more additional lots in the medium term. This, along with the fact that many of these parcels now have dwellings completed on them further reduces the capacity available in the medium term as it has already been realised.

WCGM22 featured multiple utility reserves (wastewater pump stations) and recreation reserves in the vacant land category.

Vacant lots were verified by first reviewing aerial imagery flown at the beginning of 2023 by the Waimakariri District Council to identify if a dwelling had been constructed on the remaining viable vacant sites. This was then confirmed by visiting the sites to confirm the buildings had been completed along with checking to see if any additional lots had completed buildings on them since the aerial imagery was flown.

The yield potential was also checked for multiple developments by checking the restrictive covenants to see if there was anything to prohibit further development. It was found that within Pegasus a number of lots identified by Mr Yeoman in WCGM22 featured restrictive covenants that specified minimum floor area for buildings and prohibiting further subdivision of the land. The vacant lots within the Ravenswood development (outside of Area J) are covered by restrictive covenants that prevent further subdivision or sale of the land without improvements. This meant that lots could only have a yield of 1 if there was not a house already completed due to inability to further subdivide.

Lots within the existing stages of the Woodland Estate subdivision are subject to covenants however, there are no apparent restrictions on further subdivision based on our review. Lots that had been completed were removed from the capacity assessment, and lots under construction were considered as providing only a single dwelling in the medium term. This assumption that dwellings under construction would only provide a single lot was based on the assumption that a brand new dwelling would not be demolished to create 2 lots in the medium term.

This resulted in a vacant lot yield of 209 lots within Woodend, Ravenswood and Pegasus, 204 lots less than originally predicted by WCGM22

2.3.9 Infill/Intensification

There were only 2 lots identified as providing infill/intensification in WCGM22. Both lots identified could support further subdivision to allow intensification.

Appendix C | Land Covenant Examples

RAVENSWOOD RESTRICTIVE COVENANTS

Land Use Restrictions

- 3.36 No Lot shall be used for any form of temporary residential purposes either by the construction of temporary Buildings or by the placement of caravans, modular homes, mobile homes, motor homes, house trailers, buses, tractors, huts, tents and/or vehicles able to be used for human habitation except for a builder's shed at the commencement of, and for the duration of construction, of any dwelling being erected on the Lot.
- 3.37 Lot Owners must not use any Lot for any primary purpose other than for residential occupation unless previously agreed in writing by a duly authorised representative of Ravenswood. Ancillary purposes are governed by the planning provisions under any regulatory land use controls applicable from time to time.
- 3.38 No Lot shall be sold, leased, transferred, assigned or otherwise disposed of to any Governmental agency or Territorial Authority for the purposes of public or institutional housing without the prior approval of Ravenswood.
- 3.39 No inflammable, explosive or noxious materials are to be stored or used on any Lot or in any Building. The Lot Owner must not allow any offensive activity to be conducted or permitted to exist upon any Lot, or in any Building, nor shall anything be done or permitted to exist on any Lot or in any Building that may be or may become an annoyance or private or public nuisance. An annoyance or private or public nuisance includes loud sounds or noises or offensive smells.
- 3.40 No Lot, driveway or common area shall be used for the purpose of long term vehicle parking, repair or maintenance. No unregistered, non-licensed or expired license or inoperable vehicles of any kind shall be permitted to remain on any Lot (unless parked inside the garage).
- 3.41 No recreational or commercial vehicles boats or trailers are to be regularly located on the road or in front of the Building line of the main Building constructed or to be constructed on the Lot.
- 3.42 No Lot may be further subdivided nor shall any further easements be agreed to, granted or registered on any Lot, including rights of way.

TOWNSEND FIELDS RESTRICTIVE COVENANTS:

ANNEXURE SCHEDULE

The Covenantor:

1. No Subdivision

Shall not further subdivide the land either by way of unit plan, cross-lease or fee simple subdivision, but this shall not apply to a boundary adjustment between two lots which does not create any additional record of title.

PEGASUS RESTRICTIVE COVENANTS

(3.44) No Lot may be further subdivided nor shall any further easements be agreed to, granted or registered on any Lot, including rights of way.

MANSFIELD DRIVE RESTRICTIVE ENCUMBRANCE

1. (a) The Grantor shall not cover the surface of any of the said lots with more than 300m² of any substance impervious to water (including buildings).

(b) The Grantor shall not further subdivide any of the lots by any means whatsoever including Cross-Lease Titles and the Unit Titles Act 1972.

(These covenants shall be called "the secured covenant" provided that the secured covenant shall be enforceable only against the registered proprietors and occupiers for the time being of the said lots and not otherwise against the Grantor and its successors).