

From: kimsanders@xtra.co.nz
To: [Mailroom Mailbox](#)
Subject: Chapter 6 CRPS Submission - Urban Estates Ltd
Date: Monday, 15 February 2021 4:48:39 pm
Attachments: [ECAN submission to RPS.pdf](#)

Please find attached by a submission on behalf of Urban Estates Ltd.

Please confirm by return email, acknowledgment you received this submission.

Thank you
Kim Sanders
0272342285



15 February 2021

Environment Canterbury

P O Box 345

Christchurch 8140

Re: SUBMISSION TO CHAPTER 6 OF THE CRPS BY URBAN ESTATES LTD

This submission addresses aspects in both support or objection towards the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement.

1. Background

Urban Estates Ltd are actively involved in current land development in Rolleston & Prebbleton. This includes a current Rolleston subdivision (Delapre) and two Zone Change applications (68 & 78) which Selwyn District Council have accepted and are currently preparing to notify.

Urban Estates Ltd are developers and builders who recognise market demands and who have seen how price rises can be impacted by a lack of supply and inadequate provision for future development areas.

2. The National Policy Statement

Urban Estates Ltd does not agree that the currently proposed changes to Chapter 6 gives effect to the requirements set down in the National Policy Statement. Their submission is that the land will not satisfy market demands and that the NPS “requires” Regional Councils to do better than that.

Urban Estates believes the NPS calls for all zone changes to be given the opportunity to be heard so as to assess each specific application “on it’s merits”. There should be no mechanism to hold back zone change applications being able to be heard.

3. **The Current Market**

It is quite clear that the current market through-out the country is out of control. The Central Government (via the NPS and other forums) are actively trying to control the market. One of the obvious mechanisms is to “not hold back future supplies” and to let the market set the speed of development. Developers will not build their subdivisions ahead of selling rates, they will build to the demand. There are many examples in New Zealand where lack of supply and competition has increased section prices dramatically (Auckland, Queenstown, Wanaka and now Christchurch). Christchurch stayed steady for many years after the earthquakes because the earthquake demanded good forward planning which kept ahead of the selling rates. It is clear the numbers predicted in the RPS will be used up well in advance. The NPS requires the RPS to be better prepared for the future.

4. **Support for New Development Areas**

Urban Estates Ltd supports all the new land included for Kaiapoi, Rangiora and Rolleston. It is well known that the owner of Farringdon (in Rolleston) is actively planning & engineering their new areas now. This is an obvious example that that developer expects the market to use up the supply faster than predicted.

5. **Urban Estates Ltd’s Specific Land Submissions**

Urban Estates Ltd generally supports all logical Zone Change applications including all those recently accepted by Selwyn District Council, so that each one can be treated on its merits and go through a democratic hearing process. Urban Estates have interests in two of these Zone Changes and strongly supports a third:

a. **Plan Change 78 – 63 hectares corner of Lincoln Rolleston Road and Selwyn Road**

This land has been inserted in the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement. It is clearly necessary and interestingly seems to show that ECan supports masses of land being developed in Rolleston, but not in Prebbleton which is closer to Christchurch.

b. **Plan Change 68 – 67 hectares, Hamptons Road, Prebbleton**

This land has not been inserted in the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement. Urban Estates Ltd submits that it is not right to restrict one town which is closer to Christchurch CBD from growing when an adjacent town (with only slightly inferior soils) is allowed to grow dramatically. This Hamptons Road land is the next logical extension of Prebbleton, it has residential on two boundaries and would satisfy the market to help keep Prebbleton house prices from increasing due to a lack of options.

c. **Plan Change 72 – 28 hectares, Trices Road, Prebbleton**

This land has not been inserted in the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement. Urban Estates Ltd submits the same applies for this land as in 5b

above and furthermore it is entirely logical to surround the Council's new Birches Road Park with some residential housing.

Note, details of these zones changes can be obtained on Selwyn District Councils website: [Selwyn District Council - Plan Changes](#)

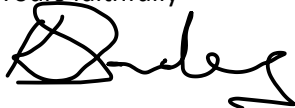
6. **General Summary**

The current CRPS proposals are producing "more of the same". Whilst Christchurch may be able to sustain these unnecessary restrictions, it will eventually reach a time when the market is stretched (again). Rather the CRPS should follow the lead made by the NPS and "open it up". There is enough evidence which has been submitted in the past (various forums) on poor economics which lead to market increases. Urban Estates submit "where is the harm" to open up a plentiful supply of future development land when it will unquestionably lead to better market conditions for New Zealand home owners.

Please note, if there are to be any hearings or informal discussions, Urban Estates would like to be heard on the matters raised above.

Address for service is: Urban Estates Ltd, c/- Kim Sanders Consulting, 30 Clark Street, Christchurch 8081.
kimsanders@xtra.co.nz, Phone: 0272342285

Yours faithfully

A handwritten signature in black ink, appearing to read 'Kim Sanders', with a stylized, flowing script.

Kim Sanders

(for Urban Estates Ltd)
