

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHĪ

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Private Plan Change 23
Whisper Creek, Spencerville to the Christchurch District Plan

**STATEMENT OF PRIMARY EVIDENCE OF RODNEY GEORGE YEOMAN ON
BEHALF OF CHRISTCHURCH CITY COUNCIL (ECONOMICS)**

Dated: 14 April 2026

TABLE OF CONTENTS

TABLE OF CONTENTS	1
EXECUTIVE SUMMARY	1
2. INTRODUCTION	3
Qualifications and experience	3
Code of conduct	4
Scope of evidence	4
3. SUMMARY OF PPC23 ECONOMIC ASSESSMENT	6
4. ECONOMIC ISSUES	8
5. SUBMISSIONS ON PPC23	27
6. CONCLUSION	34

EXECUTIVE SUMMARY

1. In this statement, I have reviewed the economic evidence provided by the applicant and submissions raising economic issues in relation to Plan Change 23 Whisper Creek. Broadly, I consider that the economic benefits associated with the proposal may be net positive, and as such I support the rezoning.
2. However, I do not consider that the Economic Assessment provided by the applicant provides a robust quantification of the benefits, and there is limited discussion of the costs which are assumed to be immaterial.
3. I consider that this one-sided approach is unusual, and that no use of a resource can be truly costless, whether that be land or any other resource. Land use is never costless in economic terms because it always involves opportunity cost and often creates externality effects. The applicant's economist should have provided a more balanced assessment to enable decision-makers to understand the full range of economic implications associated with the proposed development.
4. My review has the following core findings:
 - (a) I agree, based on information provided by the applicant, that the existing Golf course alternative is not commercially viable, which means that this alternative can be ignored as a viable option. However, in my opinion, the baseline counterfactual should be that the land remains in rural production, and that dwellings are accommodated elsewhere in the Urban Environment.
 - (b) In relation to demand and supply in the residential market and the NPS-UD Policy 2, there is already sufficient capacity provided within the planning framework to meet expected demand. However, the sufficiency requirement in Policy 2 is framed as a minimum threshold ("at least"), such that the provision of extra capacity is not precluded if the merits of a proposed development meets the other aspects of the NPS-UD.
 - (c) In relation to unanticipated development proposed in PPC23 and the NPS-UD Policy 8, it is arguable whether the development is within the definition of 'Urban Environment', however I agree that PPC23 is likely

to be 'significant' and it may 'contribute to well-functioning urban environment'.

- (d) In terms of economic benefits, the development would provide some additional competition in the housing market and housing choice, albeit relatively small within the context of the Urban Environment. The implications for affordability will be minimal, as the proposed development will provide lots and dwellings of above average size, which will mean that sales values will be above the average in the Urban Environment. Moreover, only a portion of the one-off construction benefits estimated in terms of GDP and employment should be considered as net additional to the economy. If this development does not occur, then demand would be satisfied elsewhere and hence most of the GDP and employment is not new to the economy and should not be viewed as economic benefits.
 - (e) In terms of costs, I consider that these have not been quantified or addressed in the Economic Assessment. In my opinion, there will likely be costs, such as loss of rural production, infrastructure costs, potentially a reduction in the uptake of intensification, and other externalities (environmental, social, etc.).
 - (f) The proposed provision of commercial land within PPC23 is relatively large compared to the amount of convenience based demand that can be expected. Hence the viability of this aspect of the development is questionable. While I agree that the potential retail distribution effects on other centres will be minimal, the provision of too much land precludes other uses and hence would be inefficient from an economic perspective.
5. Furthermore, my review of the economic issues raised in the submissions does not change my position, and I still consider that the economic outcome from PPC23 may be positive. However, I agree with submitters that the Economic Assessment is neither complete, nor compelling.
6. In conclusion, while I do not agree with the quantification in the Economic Assessment, and consider that it overstates the potential economic benefits and ignores the likely costs. I do however agree that PPC23 may result in positive economic outcomes relative to the counterfactual.

2. INTRODUCTION

7. My full name is Rodney George Yeoman. I am a Director of Formative, an independent consultancy, specialising in social, economic and urban form issues. Prior to this, I was an Associate Director of Market Economics Limited, an independent research consultancy, for 12 years.
8. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of economic matters arising from the submissions and further submissions on Private Plan Change 23 Whisper Creek, Spencerville to the Christchurch District Plan (the **District Plan; PPC23**).
9. I am authorised to make this statement on behalf of the Council. I understand that this statement will be attached to the officer's report under section 42 (**s42 report**) of the RMA, that is being prepared by Mr Craig Friedel.

Qualifications and experience

10. I hold the degrees of Bachelor of Commerce and Bachelor of Laws from the University of Auckland. I also hold Postgraduate Honours in Economics from the Australian National University.
11. I have over 20 years consulting and project experience, working for commercial and public sector clients. I specialise in policy assessment, industry and markets research, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.
12. I have applied these specialties in studies throughout New Zealand, and in Australia, across most sectors of the economy, notably assessments of district plan policies and rules, urban form, land demand, housing, and other local government issues.
13. I have extensive experience undertaking assessments under the Resource Management Act (**RMA**), National Policy Statement on Urban Development (**NPS-UD**), National Policy Statement for Highly Productive Land (**NPS-HPL**), and various other resource management legislation.
14. I have local experience in Christchurch providing research for Christchurch City Council, Selwyn District Council, Waimakariri District Council, Greater

Christchurch Partnership, Environment Canterbury, and developers for more than ten years.

15. Relevantly, my research is applied in the 2023 Housing Capacity Assessment¹ (**HCA**) and I provided economic evidence in the Greater Christchurch Spatial plan hearing². I have also provided research and evidence in this local area for District Plan Reviews³, Intensification Planning Instruments⁴, Private Plan Changes, Fast track applications, and Environment Court appeals.
16. I am a member of New Zealand Association of Economist, Population Association of New Zealand, and New Zealand Association for Impact Assessment.

Code of conduct

17. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

18. I have been commissioned by Council to provide evidence to this Hearing regarding the economic effects associated with proposed PPC23.
19. In preparing my evidence I have reviewed the following documents:
 - (a) "Request for Change to the Christchurch District Plan to rezone land generally located at 240 Spencerville Road, Marshlands from a Specific Purpose (Golf Resort) Zone and Rural Urban Fringe Zone to a Residential New Neighbourhood Zone" May 2025, Planz (**s32 report**).
 - (b) "Economic Assessment of Proposed Rezoning at Whisper Creek" 1 May 2025, Insight Economics attached to the s32 report as Appendix A (**Economic Assessment**).

¹ Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.

² Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan.

³ Selwyn and Waimakariri.

⁴ Selwyn, Waimakariri, and Christchurch.

- (c) “Response to RFI for Whisper Creek Private Plan Change 23” 25 July 2025, Insight Economics (**RFI Economic response**).
- (d) Associated plan change maps and other relevant technical reports from the applicant.
- (e) Reports from Council on Plan Change 14 and other planning documents.⁵

20. The following submissions:

- (a) Spencerville-Residents-Association (14), Ouruhia-Residents-Group (70), and a number of individuals (e.g. 19, 23, 63) that use the same proforma submission that oppose the development for the same reasons. These will be referred to as Spencerville-Ouruhia Residents (**SOR submissions**).
- (b) Environment Canterbury (69) which is neutral, but raises urban form and infrastructure issues which have economic implications (**ECan submission**).
- (c) A number of submissions from others in the community (22, 30, 32, 34, 54, 65 71, and 75), who oppose PPC23.
- (d) Supporting submission from the local businesses (8 and 59).
- (e) Submission from the owners of the land directly covered by PPC23 (5, 7, 52, and 58). I understand that one landowner (64) has been withdrawn their submission, so their relief cannot be considered.

21. My evidence is structured as follows:

- (a) Section 3 provides a summary of the applicants Economic Assessment.
- (b) Section 4 provides an independent assessment of the economic issues.
- (c) Section 5 provides a review of the submissions that raise economic issues.

⁵ Christchurch City Council (2025) Assessment of demand, plan enabled and feasible plan enabled housing capacity for the partial withdrawal of PC14.
 Christchurch City Council (2026) Population and Household Projections.
 Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan.
 Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.
 Environment Canterbury Regional Council (2013) Canterbury Regional Policy Statement (operative).

(d) Section 6 concludes my statement.

22. I address each of these points in my evidence below.

3. SUMMARY OF PPC23 ECONOMIC ASSESSMENT

23. First the Economic Assessment outlines the aspects of the subject site, being approximately 170ha and currently in use as a dairy farm and four 4 ha lifestyle blocks.⁶
24. The current zoning of most the land (Specific Purpose (Golf Resort)) would allow the development of a full golf course, visitor accommodation (540 bedrooms), commercial (1,500m²), and 150 dwellings.⁷
25. The PPC23 proposed zoning would enable 800 dwellings on 64ha and 1.46ha of commercial of land, with the remainder of the land near Pūharakekenui (Styx River) being open space.⁸ The economic assessment states that the proposal would achieve a density of “12.5 dwellings per hectare” on the developable land, which is less than the target of 15 dwellings per hectare for Christchurch.⁹
26. The Economic Assessment provides a discussion of the commercial viability of a golf resort development on the site, and concludes that it is “purely theoretical as no demand for such uses has materialised over the past 15 years”¹⁰ and the forgone value is “negligible”¹¹.
27. The Economic Assessment provides summary information about the housing market in Christchurch City (section 5). The assessment concludes that population growth in Christchurch has outpaced the old population projections,¹² and that the number of dwellings consented has been higher than the projections in the 2023 HCA,¹³ and that attached dwellings have become increasingly popular and account for the majority of new houses built in Christchurch.
28. The Economic Assessment briefly outlines an argument around latent demand for standalone dwellings, and Pokeno (Auckland) is provided as a case study to support this proposition.¹⁴ The assessment provides census

⁶ Economic Assessment, p3 para 1.

⁷ Ibid, Page 6 bullet points 1 to 4.

⁸ Ibid, Figure 3 Indicative Masterplan.

⁹ Ibid, p24 para 5.

¹⁰ Ibid, p8 bullet point 1.

¹¹ Ibid, p8 para 4.

¹² Ibid, sub-section 5.1.

¹³ Ibid, sub-section 5.2 and 5.3.

¹⁴ Ibid, sub-section 5.4.

data for the local area around PPC23, and concludes that the area is different to the rest of Christchurch.¹⁵ Finally, the Economic Assessment provides dwelling sales price and rents for the City, concludes that housing is becoming less affordable.

29. In relation to NPS-UD, the Economic Assessment considers that the proposed development:
- (a) is significant with respect to Objective 6.¹⁶
 - (b) will increase competition in land market with respect to Objective 2.¹⁷
 - (c) will contribute to a well-functioning Urban Environment with respect to Objective 1.¹⁸ Through the economies of scale of this large development, optimise infrastructure investment, providing jobs during the construction, and a range of urban form benefits from PPC23 master-planned development.
 - (d) provide a range of dwelling options and improve choice to meet a wide range of needs, as per Policy 1.
30. The Economic Assessment also provides a qualitative discussion of the potential implications of the commercial hub that is proposed.¹⁹ This assessment establishes the potential centres near the site that could be at risk of retail distribution effects and the total retail demand from the households that may live in development. Qualitatively, it is concluded that the proposed centre is small relative to the other centres, impacts will be dispersed over a number of centres, and much of the spend from the households will flow out to the other centres anyway. As such there is no material risk of an impact on existing centres. It is also worth noting that the RFI Economic Response provides an assessment of the scale of a normal convenience focused centre to serve the needs of the residents in PPC23. It notes that it would be 0.24ha of land and 1,250m² of Gross Floorspace Area (**GFA**), and suggests 3,000m² GFA would be appropriate upper limit.²⁰
31. The Economic Assessment quantifies some of the wider economic benefits including one-off construction benefits of \$258m in GDP and 1,865 jobs²¹,

¹⁵ Ibid, sub-section 5.5.

¹⁶ Ibid, sub-section 6.1.

¹⁷ Ibid, sub-section 6.2.

¹⁸ Ibid, sub-section 6.3.

¹⁹ Ibid, section 7.

²⁰ PPC23 1st RFI Response Economics 29.07.2025, p3.

²¹ Economic Assessment, sub-section 8.1.

ongoing activity in the new commercial space (a small café and one or two takeaway, and a preschool) with 10 jobs²², and travel time/costs savings of \$0.5 to \$1m per annum²³. Other wider economic benefits are briefly discussed qualitatively.

32. Finally, the Economic Assessment concludes that PPC23 development is supported on economic grounds.

4. ECONOMIC ISSUES

33. Based on my review of the Economic Assessment, and my experience with RMA assessments, I consider that the core economic issues are as follows

- (a) What is the counterfactual to which the proposed PPC23 development should be compared?
- (b) What is the residential demand and supply situation in the market in which PPC23 will be developed?
- (c) How does the proposed PPC23 sit within the national (NPS-UD), regional (CRPS), and district planning frameworks?
- (d) What are the economic benefits of the proposed PPC23 development, and how should they be quantified?
- (e) What are the economic costs of the proposed PPC23 development, and how should they be quantified?
- (f) Does the economic benefits outweigh the economic costs, hence the overall merits from an economic perspective?

34. I cover each of these questions to provide an independent review of the proposed development of PPC23.

What is the counterfactual to which the proposed PPC23 development should be compared?

35. A core issue in any economic assessment is definition of the baseline situation from which the proposal should be assessed. Importantly, this baseline ensures that the economic assessment measures the net benefits,

²² Ibid, sub-section 8.2.

²³ Ibid, sub-section 8.4.

rather than the gross benefits. It also ensures that the opportunity costs associated with the proposal are considered.

36. In this situation, the Economic Assessment does not apply a consistent baseline counterfactual throughout the report. For most of the assessment, it is assumed that the baseline scenario is that the golf course is not developed and the land remains in its current state.²⁴ The proposed development is assumed to generate new dwellings, which would not otherwise have been built elsewhere in the Urban Environment and are treated as being net additional.
37. However, when assessing transport effects, the Economic Assessment shifts its counterfactual and assumes that these households would in fact have lived elsewhere in the Urban Environment and would therefore have generated higher transport costs if the development does not proceed as proposed in PPC23.²⁵
38. Similarly, while the Economic Assessment notes that most of the site is currently used for rural production²⁶ at no point does the Economic Assessment consider this lost activity or whether this is a cost. Implicitly this opportunity cost of the land is ignored and assumed to be zero.
39. I consider that the Economic Assessment has not adequately set out the situation to ensure that the correct counterfactual is used. Nor has it consistently applied the counterfactual in the assessment.
40. In my opinion, I agree that the development of the golf course is not viable and that it does not represent the correct counterfactual to be adopted. The counterfactual should be that rural production on this site continues, and that development occurs elsewhere in the Urban Environment, some in Christchurch and some in other areas like Kaiapoi or Rangiora.
41. If the correct counterfactual had been applied in the Economic Assessment then:
- (a) **Rural Production:** there would be a loss of rural activity, which should have been easily quantified by the applicant's economist.
 - (b) **Net Construction:** much of the construction benefits noted in the Economic Assessment would have occurred regardless of PPC23, with

²⁴ Ibid, sub-section 4.3.

²⁵ Ibid, sub-section 8.4.

²⁶ Ibid, sub-section 3.1.

development merely being a transfer from other areas in the Urban Environment.

- (c) **Transport Benefits:** would potentially be lower, as it is likely that not all the development would have occurred in Rangiora or Rolleston, as assumed in the Economic Assessment.

42. In summary, had the Economic Assessment of PPC23 applied the correct counterfactual, the resulting analysis would have shown materially lower benefits and identifiable costs, which means that the current assessment overstates net gains associated with PPC23.

What is the residential demand and supply situation in the market in which PPC23 will be developed?

43. The Economic Assessment relied on the 2023 HCA and recent building consent data to suggest that demand may be higher in Christchurch City than previously projected.²⁷ However, the Economic Assessment does not present data on capacity or establish whether there is a need for more development capacity in the district. Nor did the assessment provide an understanding of the quantum of demand for PPC23, or even greenfield demand in the District.
44. First, I agree that demand is likely to be higher than presented in the old projections used in the 2023 HCA. I note that newer projections were released in late 2025²⁸, and Council is now applying growth projections that are higher. Their latest projections suggest a medium term (2025-2035) demand of 17,500 dwellings (including competitiveness margin), and for the long term period (2025-2053) 37,100 dwellings.²⁹ This is 46% higher than the medium-term demand shown in the 2023 HCA, which is relied on within the Economic Assessment.
45. I also note that since the Economic Assessment was produced for PPC23 that the amount of capacity provided for in the District has increased significantly. The Council was required by legislation³⁰ to provide capacity for more development potential to withdraw PC14. The adopted change to the District Plan provided plan enabled capacity of 458,262 dwellings, of which 68,200-78,400 was estimated to be commercially feasible under

²⁷ Ibid, sub-section 5.1-5.3.

²⁸ Statistics New Zealand (2025) Sub-national projections (25 Sept).

²⁹ Christchurch City Council (2025) Subnational Population Projections analysis LTP 2027.

³⁰ Schedule 3C of the Resource Management Act.

current conditions.³¹ Moreover, I note that there is likely to be considerable additional supply that becomes feasible over the long term as existing housing stock depreciates and market conditions and relationships evolve, which results in more development being feasible.

46. Therefore, the new demand projections for housing (37,100 in 2025-2053) are still significantly lower than the capacity provided for in the current District Plan (over 68,200). I consider that in terms of meeting the sufficiency test in the NPS-UD, the Council has more than achieved this requirement.
47. However, it is important to emphasise that I agree with the s32 report which notes that, *“regardless of whether or not adequate capacity is being provided, the NPS-UD does not preclude the provision of further capacity i.e. it is a tool for ensuring minimum capacity requirements are met, rather than being a tool for limiting additional capacity (provided such additional capacity is in locations that meet the other NPS-UD policy tests). In short, there is no policy direction within the NPS-UD that prevents or discourages the provision of more than adequate capacity, provided such additional growth areas are appropriately located and serviced. The NPS-UD assessment is therefore focussed on whether or not the plan change delivers a ‘well-functioning urban environment’.”* page 34
48. I agree that the PPC23 development can still be considered in terms of its merits, and that the rezoning of the site is not precluded by the fact that the recent changes in the District Plan have provided a large supply of capacity, which exceeds the likely level of demand.
49. Furthermore, I note that the 2025 capacity assessment shows remaining capacity of 7,600 dwellings in greenfield areas of Christchurch. While I agree with the Economic Assessment, which notes that “the majority of consents for the past four years running”³² were for attached housing, I consider that the minority of demand for standalone dwellings could have been assessed to establish the likely demand for greenfield locations, and hence PPC23.
50. In the absence of an assessment in the Economic Assessment, I provide the following indicative assessment based on building consents. I note that

³¹ Christchurch City Council (2025) Assessment of demand, plan enabled and feasible plan enabled housing capacity for the partial withdrawal of PC14.

³² Economic Assessment, p11 para 1.

over the last five years an average of 1,600 standalone houses were consented per annum. If half of these were in greenfield areas, then this would indicate a demand for 800 dwellings per annum.³³ This would mean that the supply of greenfield capacity could run out within the medium term, i.e. capacity of 7,600 might provide 9.5 years of supply if demand is 800 per annum.

51. While the above is an indicative assessment, potentially there could be a need for more supply in greenfield areas in the coming decade (around 2035). However, the Economic Assessment provides no evidence on this aspect, and I am unable to establish from the material whether this is the case or not.

How does the proposed PPC23 sit within the national (NPS-UD and NPS-HPL), regional (CRPS), and district planning frameworks?

52. The NPS-UD Policy 8 requires councils to be responsive to plan changes that add significant development capacity that contributes to well-functioning urban environments, even if they are unanticipated or out-of-sequence. The Economic Assessment concludes that PPC23 is significant and would contribute to the urban environment. The Economic Assessment provides no review or guidance on whether PPC23 is part of the Urban Environment.
53. I consider that for Policy 8 to apply the Site must affect an Urban Environment, and provide significant capacity, and contribute to a well-functioning urban environment.
54. First, although the Economic Assessment did not address this issue, I have considered whether the site falls within the Urban Environment. The NPS-UD does not mention Special Purpose Zones (SPZ) in relation to housing, nor does it provide a definition of what constitutes “housing land”.
55. I note that clause 3.37 Monitoring does mention some residential zones, but there is no mention of SPZ. The NPS-UD does mention SPZ in relation to business land (Interpretation 1.4(1)), “to the extent it allows business uses”. This relates to the fact that most SPZ are defined for unique/large-scale commercial or government activities which have business activities (i.e.

³³ Statistics New Zealand (2025) New Dwelling Building Consents (year end December).

Airport, Port, Corrections, Military, Hospital, Stadium, University, Tourism Activity, Māori purpose, etc).

56. In my opinion the omission of any reference in the NPS-UD to considering a residential role of SPZ when a business role is specifically referred to, means that there is no definitive direction in the NPS-UD that SPZ should be included in the assessment of housing land within the Urban Environment. A plain reading of the NPS-UD would suggest that there is no such requirement and I note that I have reviewed Housing Capacity Assessments for all of the Tier 1 councils, and some Tier 2 councils, across New Zealand. None of those assessments include SPZ within the modelled housing capacity (including Christchurch, Selwyn, Waimakariri, Queenstown, Dunedin, Auckland, Hamilton, Waipā, Waikato, Wellington, and Kaipara).
57. I note that the definition of Urban Environment is set out in Interpretation 1.4(1) of the NPS-UD, requires that land be predominantly urban in character and within a housing and labour market of at least 10,000 people.
- (a) I consider that SPZ (Golf Resort) is intended to be predominantly used for recreational tourism activity (golf course and open space) with resort facilities and low levels of ancillary accommodation in a rural setting (150 dwellings). Furthermore, the site is currently undeveloped and used for rural farming, with surrounding areas not being zoned for urban activity. Intentionally, the site is an island of activity away from the urban area. Therefore, in my opinion it is debatable whether or not this site is predominately urban, which is also covered in detail by the planning and urban design evidence. I note that s42 report finds that golf course SPRZ is urban in character³⁴ and the urban design evidence also considers that the potential residential and commercial enabled within SPRZ suggests urban character.³⁵
- (b) However, I consider that the SPZ (Golf Resort) site is likely to be within a housing and labour market of at least 10,000 people because of its proximity to Christchurch, and I would expect that most of the staff at the resort would live in the Christchurch Urban Environment. Hence this location is likely to be within a labour market of more than 10,000 people.

³⁴ S42 Report paragraph [5.3.7]

³⁵ JFJ Schroder – Urban Design Evidence – PPC23, paragraph [94].

58. Therefore, in my opinion it would be debateable whether the SPZ (Golf Resort) is within the Urban Environment because it may not pass both of the conjunctive requirements in the NPS-UD. In my opinion the SPZ (Golf Resort) is, by design, predominantly intended to be a tourism activity in a rural setting, rather than an urban setting.
59. Furthermore, not all special purpose zones are urban. Within Christchurch examples of SPZ that may not be urban are Special Purpose Zone (Styx Mill Road Transfer Station), Special Purpose Zone (Ruapuna Motorsport), Special Purpose Zone (Airport), and Special Purpose Zone (Clearwater Golf Resort). Also as example, just north of the site in Waimakariri district, Special Purpose Zone Pegasus Resort, while in Selwyn district there are a number of special purpose zones (Ski fields, Rolleston Prison, Lincoln University, Dairy Processing, Burnham Military camp etc).
60. Finally, I acknowledge the planning assessment in the section 42A report and the urban design evidence from Mr Schroder, both of which conclude that the Special Purpose Zone is predominantly urban in character. I defer to that evidence and accept that this part of the development forms part of the urban environment.
61. The second criteria in the NPS-UD Policy 8 is whether the development would add significant capacity. I agree with the Economic Assessment and s32 Report that the development would add significant capacity, because of the number of dwellings being proposed in PPC23 is relatively large within the context of the residential market in the District. However, I disagree with the method adopted in the Economic Assessment and consider the finding that a development of 15-30 lots is significant to be unreasonable.³⁶
62. The third criteria in the NPS-UD Policy 8 is whether the development would contribute to a well-functioning urban environment. While I disagree with the Economic Assessment on the quantum of the benefits and the extent to which PPC23 would contribute to well-functioning Urban Environment, I consider that it is likely that it may positively add to the Urban Environment, due to its proximity to urban Christchurch and hence consider that the proposed development is consistent with Policy 8. I cover the quantification of benefits and costs in the next parts of my evidence, and do not repeat these findings.

³⁶ Economic Assessment, p15.

63. In summary, if this land is within the Urban Environment, I consider that PPC23 would likely satisfy the other criteria of Policy 8, at least from an economic perspective. I acknowledge, however, that other factors such as transport, infrastructure, and so on, must also be taken into account.
64. I acknowledge that the NPS-HPL defines “urban” as “any special purpose zone, other than a Māori Purpose zone” and “urban rezoning” as the change of land from a general rural or rural production zone to an urban zone. I also understand that most of the PPC23 area is on highly productive soils, being Land Use Capability 2 (**LUC2**). However, due to definitions in the NPS-HPL, it is my understanding that the NPS-HPL may not apply to the SPRZ land in the application because the PPC23 area is not zoned rural or rural production. However, a small part of the RUUFZ land is LUC2 and the NPS-HPL may apply, however in my opinion this piece of land is very small and would not be viable to farm. Whether the definition of “urban” in the NPS-HPL is relevant to, or can inform, the interpretation of “Urban Environment” for the purposes of the NPS-UD is a legal issue.
65. I also note that the Site is not shown as being “urban” within the Map 1 of the Spatial Plan³⁷, the NPS-UD assessments conducted by Christchurch City Council do not include this area as being urban³⁸, and Map A of the Canterbury Regional Policy Statement (**CRPS**) also does not show the site as being “existing urban area”³⁹.
66. I disagree with the premise suggested in the s32 report, that the large amount of rural land within the (unnamed) dotted lines in Map A of the CPRS represents the Urban Environment for the purposes of the NPS-UD. That line was developed well before the introduction of the NPS-UD, and cannot therefore have been defined to be the same as the ‘urban environment’ defined under the NPS-UD.⁴⁰ Furthermore, I disagree with the s32 report, and consider that the question of what constitutes the Urban Environment in Greater Christchurch is a live issue, and is still under debate in the recent district plan hearings and Environment Court appeals.
67. Most recently the commissioners on Waimakariri District Plan Review found:

³⁷ Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan, p 12.

³⁸ Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.

³⁹ Environment Canterbury Regional Council (2013) Canterbury Regional Policy Statement (operative), p92.

⁴⁰ s32 report, p34 “Greater Christchurch, as outlined in Map A of the CRPS, is an “urban environment””.

*"We conclude that the entire Greater Christchurch Area (GCA) within Waimakariri is not intended to be an 'urban environment'. The shaded areas on Map A, shown as Existing Urban Areas, Future Development Areas and Greenfield Priority Areas, along with any other land that may be within the 'projected infrastructure boundary' will fall within the 'urban environment' of the GCA. This does not stop other areas becoming part of the urban environment 'it if is intended' under the responsive planning provisions, as the GCA meets the second part of the NPS-UD definition of 'urban environment'."*⁴¹ And *"It is 'drawing a long bow' to suggest the entire area is, or is intended to be, the urban environment for the purposes of NPS-UD, particularly when the NPS-HPL is factored into that assessment."*⁴²

68. While I agree that PPC23 would be urban if it was developed as proposed, and that the urban fringe has been extending towards the area over the last 15 years, I consider that it is arguable whether the site is part of the Urban Environment, including for the reasons given in this recent decision in Waimakariri:

*"We do not necessarily agree that any new growth areas need to be adjacent to one of the three existing residential areas within the District; however, we find that when a new growth area is proposed, it does need to demonstrate that it gives effect to the objectives and policies in both the NPS-UD and the RPS, with the RPS policies still needing to be considered."*⁴³

69. Therefore, I consider that while the land in question may not be part of the Urban Environment, this does not preclude an assessment of the proposal on its merits.

What are the economic benefits of the proposed PPC23 development, and how should they be quantified?

70. The Economic Assessment identifies a range of economic benefits, including one-off construction activity, ongoing employment in the commercial area, transport savings, increased competition, infrastructure optimisation, and economies of scale. The first three benefits are quantified, while the remaining benefits are discussed qualitatively.

⁴¹ Recommendations of the PDP Hearings Panel Report 1 2025, p40 para 90.

⁴² Recommendations of the PDP Hearings Panel Report 3 2025, p18 para 54.

⁴³ Recommendations of the PDP Hearings Panel Report 35 2025, p4 para 20.

71. In terms of the first three, I consider that the values presented by Economic Assessment do not adequately account for the baseline counterfactual. This means that the values estimated in the Economic Assessment should be viewed with caution, for the following reasons:
- (a) Most of the construction value quantified in the Economic Assessment would occur regardless of whether the development proposed to be enabled by PPC23 occurs or not. While that development would provide local benefits to nearby businesses, within the Urban Environment the vast majority of this activity would take place elsewhere anyway if PPC23 did not occur. This transfer effect is a well-recognised limitation of the modelling approach used in the Economic Assessment. As a result, the economic benefit from the development is likely to be considerably smaller than the \$26m GDP and 186 jobs per annum reported.⁴⁴ The Economic Assessment implicitly assumes that households who would reside in the PPC23 area would otherwise live in a different city, whereas the more likely outcome is that most PPC23 households would rather find an alternative location within the Christchurch Urban Environment, which then would generate a similar level of economic activity elsewhere within Christchurch. Therefore, the net benefits from construction associated with PPC23 will only be the difference between building houses in PPC23 versus the construction occurring in an alternative part of the Urban Environment, which will be marginally different at best and only a small share of the reported GDP and jobs.
 - (b) The same issue applies to ongoing employment in the commercial area. Broadly, I accept the Economic Assessment's estimate that businesses in the area may feasibly employ around 10 people if the commercial centre has a convenience role for the local residents.⁴⁵ However, these jobs would be supported by households whose demand would exist regardless of where they live within the Urban Environment. Consequently, this on-going activity represents a transfer effect, as the activity would occur under both the counterfactual and the development of PPC23, meaning the net economic benefit is likely to be marginal at best.

⁴⁴ Economic Assessment, subsection 8.1.

⁴⁵ Ibid, subsection 8.2.

(c) The calculation of transport savings in the Economic Assessment acknowledges that the households that may live in PPC23 will in fact still live within the Urban Environment (Rangiora or Rolleston). However, I consider that the assumption that 100% of households would live in Rangiora or Rolleston is not realistic or relevant. This outcome would represent a very unlikely situation, and in my opinion if PPC23 was not developed then demand would be accommodated across a range of locations, including other parts of Christchurch and other areas in Selwyn and Waimakariri that are closer (i.e. Kaiapoi, Prebbleton). Hence the travel time and fuel cost savings estimates presented in the Economic Assessment will overstate the benefits, and the true value would be well below the range shown in the Economic Assessment (\$0.5 to \$1m).⁴⁶ I would expect that if a reasonable distribution of alternative locations was applied then the benefits would be materially smaller.

72. As outlined above, I consider that the quantified benefits from PPC23 are materially smaller than presented in the Economic Assessment. I consider that the assessment presented does not adequately estimate the benefits and that while there are likely to be some economic benefits, the magnitude of those benefits estimated in the report are overstated significantly.

73. In terms of the other benefits that were not quantified, I consider these will be relatively small.

(a) **Competition:** the potential impact of the development on competition is likely to be small, given that the proposal would deliver approximately 80 dwellings per year. This represents less than 0.8% of annual house sales and around 2% of new dwelling construction in Christchurch. In my view, a supply increase of this scale would not be sufficient to structurally alter competitive conditions in the housing market. Furthermore, it is likely that, in the absence of approval for PPC23, a substantial proportion of these dwellings would be delivered in alternative locations, with broadly similar implications for competition. On that basis, I consider that the proposal would result in minimal net additional positive effects on competition at a city-wide scale, although I accept that there may be a marginal benefit. Finally, I consider that the Economic Assessment's reference to "market power" is

⁴⁶ Ibid, subsection 8.4.

unsubstantiated and this discussion is unhelpful as it exaggerates the potential benefit in this context.⁴⁷

- (b) **Optimise infrastructure:** there can be circumstances in which spare capacity exists within infrastructure networks because other planned development has proceeded more slowly than anticipated, or where infrastructure has already been provided such that additional development can occur at relatively low marginal cost. There can also be cases when master planned and strategically located developments can be more efficient than unplanned development, and I accept that such situations and outcomes can arise. However, the generic statements in the Economic Assessment provide no evidence that this is the case for PPC23.⁴⁸ It therefore remains to be demonstrated whether development under PPC23 would in fact 'optimise' the use of infrastructure or instead use infrastructure in a way that will instead cause additional infrastructure to be required more quickly than it would otherwise be. In this respect, I consider that the detailed infrastructure evidence should be preferred, and that the largely theoretical assertions in the Economic Assessment are of limited value to the assessment of PPC23.
- (c) **Catering to a Variety of Housing Needs:** the Economic Assessment notes that PPC23 will provide a range of lots, and some spanning 1,000m² to 2,000m² which will enable a variety of housing to be built.⁴⁹ The Economic Assessment provides no data on the proposed lot size distribution in PPC23, and the Indicative Masterplan likewise contains no such information.⁵⁰ The economic assessment simply notes a density of 12.5 dwellings per hectare will be achieved. In the absence of this evidence, I have identified the larger lots along Turners and Spencerville Roads, which appear to comprise approximately 60 lots, or less than 8% of the total development. While I accept that the inclusion of a broader range of lot sizes may offer greater choice than is typical of recent Christchurch developments, this is unlikely to be market-transforming. Accordingly, any associated benefits to consumer choice are likely to be minimal, and relate to a very small number of lots each year (approx. 6 per annum). Furthermore, I note that the first RFI

⁴⁷ Ibid, subsection 6.2.

⁴⁸ Ibid, subsection 8.3.

⁴⁹ Ibid, subsection 6.4.

⁵⁰ PPC23 2nd RFI Response Appendix 2 Graphic Attachment 28.8.25, p11.

response indicates a yield of approximately 15 households per hectare, with the majority of lots sized between 450-500m² and perimeter lots around 700m². If 15 households per hectare is achieved, then the lot sizes would be broadly consistent with existing supply and, as such, are unlikely to materially increase the variety of lot sizes available in the market. The table below shows the density used in the Economic Assessment, and the suggested density in the RFI response, along with the implied dwelling and average lot sizes.

Information Source	Households per ha	Developable Land (ha)	Implied Dwellings	Implied Lot Size (avg)
Economic Assessment (8.5)	12.5	64	800	800
First RFI Response (15)	15		960	667

- (d) **Affordability:** the Economic Assessment notes that the development will not be as dense as other developments⁵¹ with larger lots and it also suggests a higher construction cost than the average⁵². I agree that PPC23 is likely to have larger lots and average-higher end dwellings, which naturally means that the average price of the dwellings in this development will be higher than the market average sale price in Christchurch. In my opinion, it is likely that the sale price of the average dwelling in PPC23 will be higher than the average (greater than \$642,000) and hence less affordable than the average Christchurch dwelling. This means that it is unlikely that the development will improve affordability. I consider that there is no evidence provided which supports the notion that the proposed development would materially improve housing affordability.

74. Finally, I note that the other benefits mentioned, Highest and Best Use and Investment Signals, are only covered in a single sentence each. There is no evidence presented that would suggest that these will be material. I consider that they are of little relevance to the assessment of the merits of PPC23.
75. In conclusion, I consider that PPC23 will generate some positive economic benefits. However, the quantified benefits in the Economic Assessment are overstated, and the benefits that were discussed qualitatively are unlikely to be material. While the Economic Assessment does not provide a robust

⁵¹ Economic Assessment, subsection 8.3.

⁵² QV Cost Build 2025.

estimate of the economic benefits, I agree that the development is likely to deliver some marginal economic benefit.

What are the economic costs of the proposed PPC23 development, and how should they be quantified?

76. I consider that the economic costs of the development are the loss of existing rural activity on the site, additional infrastructure costs, inefficient commercial provision, implications in terms of development pattern, and that there may be other externalities which are not discussed in the Economic Assessment.
77. First, it is standard practice for an applicant's economist to estimate the economic value of forgone rural production when assessing greenfield development proposals. In this case, the Economic Assessment notes that the subject land is currently used for rural production and is described as a "dairy farm", however no attempt has been made to quantify the value of lost production this farming activity ceases.
78. This quantification would have been a straightforward exercise. The applicant could have provided operational data for the existing farming activity, or the economist could have relied on publicly available benchmark information for Canterbury dairy farms.⁵³
79. By way of indication only, applying average Canterbury dairy farm financial data to the land area of approximately 150 hectares (excluding the four rural lifestyle lots) suggests annual revenue in the order of \$2.5 million and operating profit of approximately \$1 million. These figures indicate that the opportunity cost of removing the land from productive rural use may be substantial.
80. As discussed above in my statement [64], I acknowledge that most of the land is highly productive (LUC2), and NPS-HPL does not apply to the SPZ land and may or may not apply to the small piece of rural land on one of the lifestyle lots. Regardless of whether the NPS-HPL applies, the development of the site for residential purposes would still result in the loss of existing economic activity i.e. rural production. No use of a resource, whether land or any other productive input is truly costless, and the Economic

⁵³ As an example, DairyNZ provides farm data publicly which can be used to estimate the current production. Benchmarking - DairyNZ.

Assessment is therefore deficient in failing to identify and account for this cost.

81. Second, a common issue with greenfield developments is that they require new infrastructure to enable development to occur. Councils plan for this by budgeting for infrastructure in their Long-Term Plans and charging appropriate development contributions to ensure that this costly investment is funded by growth in the areas that will be serviced. Notably, development contributions are set to recover the forecast cost of planned infrastructure. Importantly, infrastructure generally needs to be delivered ahead of growth, which means that if development in the planned areas occur more slowly than anticipated, the development contributions collected may not be sufficient to cover the upfront investment.
82. In the case of new, unplanned greenfield developments, growth can be diverted away from areas for which infrastructure has already been provided or planned. This can reduce development contributions collected in those locations, creating a funding shortfall that must ultimately be met by ratepayers. Such an outcome is inefficient, as it fails to optimise the use of existing and committed infrastructure.
83. Furthermore, unplanned greenfield development may require additional infrastructure investment, resulting in duplication, both in the planned areas that experience slower than expected growth and in the new greenfield area requiring servicing. Potentially, even if the unplanned greenfield development were to pay development contributions at the current rate, these charges may not fully reflect the marginal cost of extending or duplicating network infrastructure, particularly where scale efficiencies are lost or where the investment was not anticipated in council funding programmes.
84. The Economic Assessment does not adequately cover this matter, instead relying on generic and largely unsubstantiated statements to conclude that the proposal would have positive infrastructure benefits. In my view, there is a reasonable likelihood that the development would generate additional infrastructure costs, meaning that this aspect of the proposal could be adverse rather than beneficial economic outcome.
85. For the reasons outlined above, I consider that detailed infrastructure evidence should be provided, and that the largely theoretical assertions contained in the Economic Assessment are of limited assistance in

evaluating the economic outcomes and infrastructure implications of PPC23.

86. Third, the development is proposed to include a commercial centre which is intended to “meet the day-to-day convenience needs of residents”⁵⁴, the indicative scheme plan records “1.46ha COMMERCIAL” on the land shown as pink area⁵⁵, and the RFI responses suggest less than 3,000m² GFA within a Neighbourhood Centre Zones (**NCZ**)⁵⁶. Finally, the Economic Assessment suggests that this centre could accommodate 10 jobs⁵⁷, the traffic assessment notes that the centre will “not attract trips from the wider network”⁵⁸, and the urban design report states “concept plans anticipating a preschool and 3-4 small-format retail or hospitality spaces”⁵⁹.
87. These various statements represent conflicting information within the application, and I consider that there is a risk that the development provides a large area of land for commercial activity, which would be inefficient. I agree that it would be sensible to include a small NCZ to “meet the day-to-day convenience needs of residents” and that demand would likely only support a small amount of floorspace (several shops and approximately 10 jobs). At this scale, this would be a dairy, takeaway, and café, all of which would be easily accommodated in less than 1,000m² GFA.
88. However, there is an inconsistency between the planned commercial land (1.5ha of NCZ) and the evidence presented by the economist, urban designer, planner, and transport experts, who are all suggesting a much smaller centre when measured by activity or floorspace.
89. If 3,000m² of GFA was feasible to be developed, that would equate to a site coverage of 20%, which is a very low site coverage for this type of centre. This begs the question of what happens on the rest of the land. It would be more efficient if the 1.5ha of NCZ land was reduced to allow other activities on this land.
90. The RFI Response from the applicant’s economist suggests that PPC23 would need 0.24ha of land and 1,250m² of GFA.⁶⁰ This would mean

⁵⁴ s32 report, p12, point (e).

⁵⁵ PPC23 2nd RFI Response Appendix 2 Graphic Attachment 28.8.25, p17.

⁵⁶ PPC23 2nd RFI Response 28.8.25, Planz, p1.

PPC23 1st RFI Response Economics 29.07.2025, p3.

⁵⁷ Economic Assessment, subsection 8.2.

⁵⁸ PPC23 Appendix E Transport Novo Group April 2025, p17, para 44.

⁵⁹ PPC23 Appendix G Urban Design DCM Urban Desing Limited May 2025, p3, para 5.

⁶⁰ PPC23 1st RFI Response Economics 29.07.2025, p2.

approximately 1.2ha of land could be freed up and used for other purposes, such as housing.

91. From my own assessment, and from the RFI response of the applicant's economist, I consider that the proposed maximum of 3,000m² GFA is excessive, given the proposed number of residents and the neighbourhood role of the centre.
92. The RFI Response from the applicant's economist sets out examples of NCZ as the rationale for 3,000m² GFA limit.

- (a) **Templeton:** which has a similar number of households and is located on the edge of Christchurch. The applicant's economist suggests that there is approximately 2,000m² GFA within the NCZ.

I have reviewed the parcels within the NCZ and consider that most premises are not operating primarily to "meet the day-to-day convenience needs of residents." Instead, they are likely to draw from a much wider catchment in order to remain viable. I note that some of the NCZ is located directly on State Highway 1, which influences the potential catchment and customers that will be drawn to these businesses.

By way of example, I note the following premises: Golden Mile Motel, Cavalier Trotting Products, Canterbury Equestrian, and Canterbury Antiques. Each of these businesses would necessarily rely on customers from well beyond the local area, and the location on State Highway 1 is likely to enable these businesses to capture customers from a wider catchment beyond Templeton.

In contrast, there is a small amount of genuine local convenience activity, namely Templeton Takeaway, Unichem Pharmacy, Number Five Café, and Templeton Medical, which are accommodated within less than 1,000m² of GFA.⁶¹

In my opinion this scale of local convenience is what was intended for PPC23, i.e. "several shops" and "10 jobs". The Templeton example does not support the applicant's economist's contention of needing 3,000m² GFA, instead it shows the opposite which is that much less floorspace is required.

⁶¹ CoreLogic Property Guru.

- (b) **Tai Tapu:** which is further from the edge of Christchurch, contains approximately 200 dwellings, and is noted as having 2,600m² GFA. Tai Tapu is different to PPC23, as it is located on the main highway to Banks Peninsula (State Highway 75), which contributes to a large number of drive-by customers. Also, it is surrounded by a large rural catchment which will also provide customers to the businesses in Tai Tapu. Furthermore, there is no NCZ within this settlement.

My review indicates that the local-convenience activities in Tai Tapu comprise a café (General Post), dairy (The Store), massage business (Be Lifted Body NZ), and an office (Generation Homes), which together occupy less than 1,000m² GFA.⁶² In addition, the Tai Tapu Playcentre occupies approximately 450m² of GFA. At most there would be a 1,450m² GFA of local convenience activities in this settlement, and much of it would be supported by demand from outside of the community.

I also note the presence of a petrol station and automotive repair activities located on State Highway 75, which are clearly performing a wider function, i.e. highway-oriented function and rural support role, than would be anticipated for PPC23.

Accordingly, this example does not support the applicant's economist's contention that approximately 3,000m² of GFA being reasonable.

- (c) **Parklands:** a centre of approximately 1.3 hectares of land which is zoned Local Centre Zone. The land area of this centre is smaller than is proposed in PPC23, but it is zoned for a higher role than PPC23.

This centre accommodates a wide range of stores: a supermarket (FreshChoice), fish and chips, Indian restaurant, New Wok, Subway, sushi outlet, beauty salon, law office, Bay Audiology, Harcourts, Unichem Pharmacy, Liquor store, Queenspark tavern, and a café. Together these activities occupy almost 5,000m² of GFA.⁶³

I consider that this example demonstrates what could readily be accommodated within the land proposed for PPC23, and that this scale of commercial activity would inevitably serve a much wider role and catchment than is intended for PPC23 and therefore would not be

⁶² CoreLogic Property Guru.

⁶³ CoreLogic Property Guru.

consistent with the intended function of the proposed NCZ. In my opinion, this example provides clear evidence that the land identified in PPC23 for commercial activity is oversized relative to its stated purpose.

93. While I agree that an upper limit of 3,000m² of GFA would minimise the impacts on other centres in the hierarchy, I do not agree that providing this quantum of space is appropriate for PPC23.
94. In my view, in order to be viable, businesses occupying this amount of GFA would need to attract a substantial number of customers from beyond the PPC23 catchment. That scale of GFA would allow dozens of stores (not several) and potential for larger premises (like a small supermarket). For these businesses to be viable, they would need to attract customers from outside PPC23, shifting demand away from other centres in the network and affecting how those centres operate. These outcomes would have implications for traffic generation, urban design outcomes, and other aspects of the application evidence.
95. I consider that the proposed 1.5ha of NCZ land is inefficient, and that there would be an economic cost if an excessive amount of land were zoned for NCZ but not taken up by development. Moreover, if 3,000m² of floorspace were to be developed, there would remain a risk that a proportion of the area could remain vacant for an extended period, potentially for decades, thereby imposing a cost on the wider community.
96. Fourth, I consider that there may be implications in terms of the development pattern in the urban environment. Potentially other more favourable development sites may not be developed, or may be developed later, if PPC23 proceeds. The Economic Assessment has not considered where the households may have located under the baseline (counterfactual), therefore it is not possible to establish from the evidence provided, whether or not, the development would be positive in terms of the Urban Environment. Nevertheless, the PPC23 area is located in close proximity to urban Christchurch, and there are benefits to that location relative to less proximate development areas such as some areas in Waimakariri.
97. Finally, there are always externalities associated with land use, whereby costs and benefits flow from an activity onto others in the community who are not party to the development. While I accept that under the RMA in

most instances these costs and benefits are assessed by other experts (for example noise, environmental, social, cultural, and transport effects), it is common practice for an economic assessment to acknowledge such externalities because they can influence overall economic outcomes. The Economic Assessment has not provided a discussion of potential externality costs. In my opinion, this should have been included, at least to note whether such effects are being addressed elsewhere in the application evidence.

Does the economic benefits outweigh the economic costs, hence the overall merits from an economic perspective?

98. In my opinion the Economic Assessment does not provide sufficient information from which to support a conclusion as to whether PPC23 would result in an overall net benefit or an economic efficiency gain.
99. In my opinion, the economic benefits of the proposal are likely to be small but positive, while the associated costs are likely to be smaller. Accordingly, I agree that the development is likely to be positive in net terms, however I consider that the Economic Assessment overstates the magnitude of those benefits.

5. SUBMISSIONS ON PPC23

Spencerville and Ouruhia Residents

100. The Spencerville and Ouruhia Residents Group (SOR), along with a number of individual submitters, have lodged submissions raising the same matters opposing PPC23. In this evidence, I respond to these submitters collectively. I have reviewed their statements and respond below, and summarise the points with which I agree and disagree.

SOR Submissions - Points of agreement

101. First, the SOR submissions outline concerns about externality costs such as negative transport impacts⁶⁴, potential natural hazards⁶⁵, infrastructure impacts⁶⁶, ecological impacts⁶⁷, amenity⁶⁸, and noise⁶⁹. While these points will be addressed by other experts, it does indicate that there are potential

⁶⁴ Para 6.1-6.29.

⁶⁵ Para 7.1-7.4.

⁶⁶ Para 8.1-8.3.

⁶⁷ Para 9.1-9.2.

⁶⁸ Para 10.1-10.2.

⁶⁹ Para 13.

externalities which could have costs which are not considered in the Economic Assessment.

102. I consider that the SOR submitters may have legitimate concerns regarding these matters. As an example, the Economic Assessment relies on generic and largely theoretical discussion of the transport and infrastructure impacts. I do not consider that the Economic Assessment provides sufficient evidence to support its findings of positive transport benefits or optimal infrastructure outcomes, as claimed.
103. Second, the SOR submitters contest that the economic benefits in the Economic Assessment are “exaggerated”.⁷⁰
104. I agree, and as I have discussed above the Economic Assessment provides estimates of economic benefits that I consider to be overstated. Moreover, the Economic Assessment has not provided an assessment of economic costs.
105. Third, the SOR submitters are concerned that there are no guidelines on the types of activities that are permitted in the commercial area. They would like hours of operation controlled and restrictions on “antisocial or toxic activities e.g. public bars, liquor store, vape stores, etc”.⁷¹
106. I agree, there should be some control on the activity enabled in the commercial area so as to avoid the potential for retail distribution effects. The potential antisocial activities raised in the submissions are outside my area of expertise. My understanding is that a new proposal has been suggested by the applicant’s planner in the RFI response that the commercial land be covered by the NCZ framework from the District Plan.⁷²
107. I agree with this approach and consider that this application of the NCZ framework would appropriately address the types of activities that should be enabled in the area. However, I reiterate my view that the scale of land identified and the maximum GFA proposed do not align with the local needs of the community and would result in inefficient outcomes.

⁷⁰ Para 11.

⁷¹ Para 10.

⁷² PPC23 2nd RFI Response 28.8.25, Planz, p1.

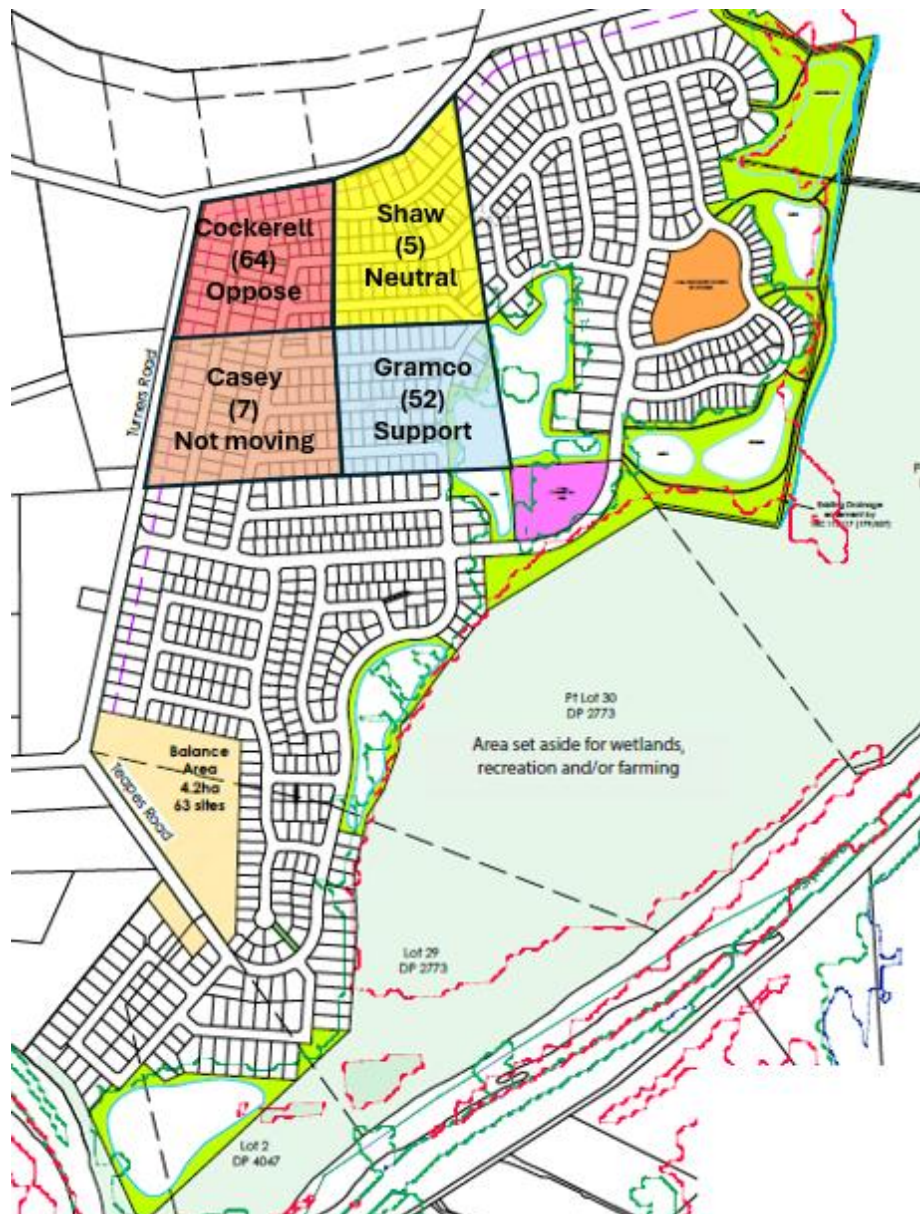
108. Fourth, the SOR submitters consider that there is no evidence presented in the Economic Assessment that there is demand for residential development in this area.⁷³
109. I agree that the Economic Assessment has not provided evidence of residential demand specific to this location, nor that such residential demand is inherent to this development. I consider that the development is likely to attract residents who would otherwise have lived elsewhere within the Urban Environment, and across a range of alternative locations.
110. Fifth, the SOR submitters question whether the development of 800 dwellings is achievable as the applicant only owns 64ha of the 170ha site.⁷⁴ I note that the other landowners have submitted on the hearing as follows:
- (a) Tipple (58): owner of 88ha of farm (144 & 165 Turners Road) supports PPC23.
 - (b) Gramco (52): owner of lifestyle of 5ha (176 Turners Road) supports PPC23.
 - (c) Casey (7): owner of lifestyle of 5ha (176 Turners Road) supports PPC23 but “intend on remaining on our property”.
 - (d) Shaw (5): owner of lifestyle of 5ha (220 Turners Road) neutral on PPC23 and “non committal”.
 - (e) Cockerell (64): owner of lifestyle of 5ha (174 Turners Road) opposed PCC23 and for a number of reasons. However this submission has now been withdrawn.
111. Both of the owners of the SPZ Golf Resort land support PPC23 (i.e. the applicant and Tipple). However, some of the owners of the lifestyle lots that are Rural Urban Fringe Zone either non committal, do not intend to move, or did not support. Only one appears to support the development of their land and be willing to undertake the development (Gramco).
112. The three landowners that are not committed to the development of their land have the parcels on the edge of the development along Turners and Spencerville roads (shown below in Figure 1, red, yellow, and orange parcels). I agree with the SOR submitters that the non-development of

⁷³ Para 14.

⁷⁴ Para 18.

these sites could have implications for the development, and I estimate that there are around 179 lots in the three parcels.

Figure 1: Rural Lifestyle Land Owners Position



113. If these three parcels (owned by Cockerell, Shaw and Casey) are not developed, then capacity in PPC23 would fall to around 621 lots (52 dwellings on Gramco land and 569 dwellings on the SPZ Golf Resort land held by the applicant and Tipple). In this case the resulting yield is less than modelled in the Economic Assessment, therefore economic benefits would reduce proportionally, and the size of the centre required to support those households would also need to be reduced. However, I acknowledge that landholder willingness to develop can and does change over time, therefore

these benefits may simply be deferred and spread further into the future than is shown in the Economic Assessment.

SOR Submissions - Points of disagreement

114. There is one point on which I disagree with the SOR submitters, that being that they consider that the development will result in a negative outcome to the community.⁷⁵ I interpret this as meaning a negative net economic outcome for the Christchurch District or the wider Urban Environment.
115. In my opinion, the development may result in a net positive outcome. Notwithstanding, my position that the Economic Assessment has overstated the quantum of the benefits, and that the net economic outcome is likely to be materially smaller than implied in the report. Therefore, I disagree with the submitters on this aspect.

Environment Canterbury Submission

116. The ECan submission is neutral in relation to PPC23. However, ECan raises a number of matters that require consideration, including issues that have economic implications.

ECAN Submission - Points of agreement

117. First, ECan submission focusses on Policy 8 of NPS-UD and observes that unplanned development risks placing growth in locations that are not appropriate, which can lead to poor urban form, and higher infrastructure costs.⁷⁶ ECan submits that there may be additional infrastructure costs required to allow the development of PPC23 and the development is inconsistent with policy of encouraging growth to encourage active and public transport network. Also, that the site is not identified as existing urban, future development area or greenfield priority in Map A of CRPS.
118. I agree with ECan that there may be negative infrastructure and transport costs associated with developing PPC23, and that the site is not defined as urban within the CRPS. These issues are important in terms of the assessment of PPC23 and as discussed in my evidence, they are not adequately covered in the Economic Assessment. I also agree with ECan that these issues are not “insurmountable”, but they should still be considered when assessing the merits of PPC23.

⁷⁵ Para 11.

⁷⁶ Para 3.1-3.8.

119. Second, ECan outlines concerns about potential issues associated with natural hazards, ecology, contaminated land, freshwater systems and flooding.⁷⁷
120. I acknowledge these points, and consider that these potential externalities associated with the development of PPC23 could have economic implications which are not addressed in the Economic Assessment.
121. Third, ECan notes that the development will require a range of resource consents. The ability of the developer to obtain these consents, and the associated costs, may affect the feasibility of the development and the appropriateness of the plan change.
122. I accept that there may be additional costs associated with obtaining resource consents, and that these may affect the feasibility of the development, or components of the development. Whether this would result in a material change to the development would depend on evidence presented by other experts. However, I consider that this issue is not relevant to economic outcomes.

ECAN Submission - Points of disagreement

123. I have no points of disagreement with the ECan submission.

Local Business Submissions

124. There are submissions by local businesses which support PPC23, Lange (8) and Ouruhia Model School (59).

Local Business Submissions - Points of agreement

125. The submission from Mr Lange, who is a local builder, is that there is a shortage of greenfield capacity in Christchurch City, and allowing PPC23 would provide housing options near the city
126. I note that the Economic Assessment has not established whether there is a shortage or not. However, my indicative assessment in this evidence suggests that there may be a need for additional greenfield residential supply in Christchurch towards the middle of next decade (i.e. after 2035). Therefore, I agree with Mr Lange, and consider that PPC23 could be beneficial in terms of providing greenfield capacity.

⁷⁷ Para 3.9-3.14.

127. The submission from Ouruhia Model School is that the development of PPC23 would result in more children living in the area and this would mean that their school would have a larger student role. This would be efficient use of education infrastructure as the school has excess capacity to meet this demand. However, the school supports staging of PPC23 to allow the school to manage staffing levels to meet the demand.
128. I accept this position, and consider that there may be benefits for the school in terms of increased role and efficient use of the education infrastructure if PPC23 was developed. Potentially staging could be adopted by the applicant to address the School's concerns.

Local Business Submissions - Points of disagreement

- 5.30 I have no points of disagreement with local business submission.

Other Submissions

129. There are submissions by other local residents which include economic issues, which I review below as a group.
130. The submission by other local residents note the following issues:
- (a) result in additional infrastructure costs (22, 32, 54, 71, and 75).
 - (b) negative transport implications in terms of local network and across the wider network (22, 30, 34, 71), with the new residents needing to travel to meet most of their daily needs.
 - (c) range of externalities which includes hazards, noise, dust, ecological, social, amenity, and cultural values (22, 32, 34, 54, 65, and 75).
 - (d) the Economic Assessment overstates economic benefits (22).
 - (e) question whether the development is practically feasible because the developer does not own all of the land (22, 32, 540).
 - (f) whether golf course development is in fact not feasible (30),
 - (g) concerned that there is no demand for the smaller lots (30, 34).
 - (h) will not provide low cost housing or genuinely affordable housing (54).
 - (i) no evidence provided that other alternatives for accommodation demand in the Urban Environment are not available or better, and that

PPC23 will result in urban sprawl which is inconsistent with NPS-UD, CRPS and District Plan (30, 32, 34, 71, and 75).

- (j) The location of the proposed commercial centre within the PPC23 means that it will not be accessible to drive by trade or non-residents, which will undermine the viability of the centre (75).

- 131. I agree with many of the points raised by the submitters, and note that I have covered these issues in my statement of evidence above. I do not repeat my position for points (a) to (e), or (h)-(i), and focus instead on points (f), (g), and (j).
- 132. First, I disagree with issue (f) and consider that the golf course development is unlikely to be developable, and should not be considered as the baseline from which PPC23 is assessed. As noted above, if this alternative was viable then it would have been developed at some point over the last decade and half.
- 133. Second, I disagree with issue (g) and consider that there is demand for a range of lots and that smaller lots have been provided by the market in the Urban Environment. If lots were provided in this range, then I would expect that they would be sold and developed.
- 134. Third, I agree with issue (j) and consider that the commercial area is located within PPC23 and will not be readily accessible to drive-by customers or to the wider community outside of PPC23. As a result, the level of commercial activity within this centre is likely to be limited, given the relatively small turnover that can be expected from residents within PPC23 alone. As noted earlier in my evidence, I am concerned that the amount of land and GFA proposed is not commensurate with the convenience needs of the community and is therefore likely to be inefficient.

6. CONCLUSION

- 135. In summary, I consider that it is likely that the overall benefits associated with PPC23 may outweigh the costs, which means that the development can be expected to generate a net positive outcome for the community.
- 136. However, I consider that the Economic Assessment from the applicant overstates the economic benefits and does not address the economic costs. Therefore, it is not possible to quantify the exact scale of the

economic outcome, and the extent to which the development will generate net benefits.

137. I consider that the newly proposed framework for the commercial centre (NCZ of less than 3,000m² GFA) is likely to lead to an inefficient use of land within PPC23. I recommend that the land area for NCZ be reduced to 0.24ha (or equivalent to around 1,000m² GFA), which aligns with the estimated area suggested by the applicant's economist in the RFI Response.
138. The submissions presented by the submitters have not resulted in changes to my conclusions in regard to the Economic Assessment and the economic merits of PPC23.

Rodney Yeoman

A handwritten signature in black ink, appearing to read 'Rodney Yeoman', with a long horizontal line extending to the right.

14 April 2026