

**BEFORE AN INDEPENDENT HEARINGS COMMISSIONER AT
SELWYN**

IN THE MATTER OF

Clause 21 of the First Schedule of the
Resource Management Act 1991
(Plan Change 67)

IN THE MATTER OF

GW WILFIELD LIMITED
(Applicant)

**STATEMENT OF EVIDENCE OF FRASER JAMES COLEGRAVE ON
BEHALF OF GW WILFIELD LIMITED**

ECONOMICS

Dated: 30 August 2021

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1 INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

- 1.1 My full name is Fraser James Colegrave. I am an economist and the managing director of Insight Economics, an economics consultancy based in Auckland. Prior to that, I was a founding director of another consultancy, Covec Limited, for 12 years.
- 1.2 I hold a Bachelor of Commerce (1st Class Honours) in Economics from the University of Auckland.
- 1.3 I have over 24 years' commercial experience, the last 21 of which I have worked as an economics consultant. During that time, I have successfully led and completed more than 500 consulting projects across a broad range of sectors.
- 1.4 My main fields of expertise are land-use and property development. I have worked extensively in these areas for dozens of the largest developers in New Zealand. In addition, I regularly advise Local and Central Government on a range of associated policy matters.
- 1.5 Over the last 15 years, I have worked on numerous land use and property development projects across Greater Christchurch, including several in Selwyn. I am therefore familiar with the economic structure of the district, and its role in the Greater Christchurch subregion.
- 1.6 I also regularly appear as an expert witness before Councils, Boards of Inquiry, Independent Hearing Panels, the Land Valuation Tribunal, the EPA, the Environment Court, the Family Court, and the High Court of New Zealand.

Code of conduct

- 1.7 I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2014, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

1.8 My evidence is presented on behalf of the Applicant, GW Wilfield Limited.

1.9 My evidence is structured as follows:

- (a) A brief description of the proposed plan change.
- (b) Consideration of the need for the plan change according to the Council's requirements under the National Policy Statement On Urban Development 2020 (*NPSUD*).
- (c) An assessment of the economic costs and benefits of the plan change, particularly in light of the perceived need for it according to my earlier NPSUD analysis.

2 SUMMARY

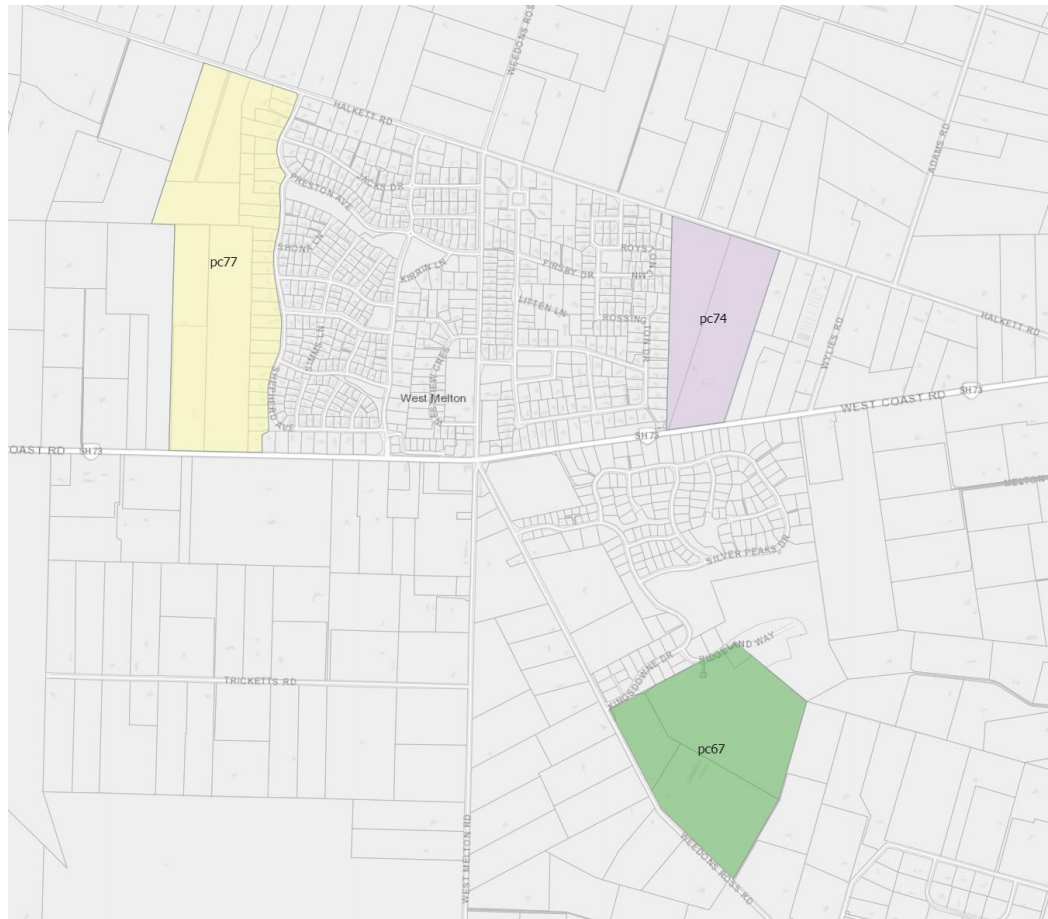
- 2.1 The proposed plan change seeks to rezone about 33 hectares of Inner Plains Rural Land to create 130 low density residential sites. The plan change areas is immediately south, and hence will form a logical extension of, the Wilfield development.
- 2.2 This evidence shows that the Council is currently not meeting its obligations to provide at least sufficient capacity to meet the demand for new dwellings, as required by the NPSUD.
- 2.3 This is because the Council's estimates of demand for additional dwellings are inordinately low, while its estimates of likely capacity to meet that demand appear grossly overstated.
- 2.4 When the various issues identified herein are addressed to provide more reliable estimates of dwelling supply/demand, the district clearly faces significant supply shortfalls under the short, medium, and longer terms. Accordingly, additional land needs to be identified and rezoned as soon as possible to meet NPSUD obligations, and to enable the efficient operation of the local land market.

- 2.5 Overall, it is my assessment that the proposal will provide strong economic benefits, including:
- (a) Providing a direct boost in market supply to meet current and projected future shortfalls;
 - (b) Bolstering land market competition, which helps deliver new sections to the market quicker and at better average prices;
 - (c) Helping to provide for a range of housing typologies to meet a diverse range of needs and preference, which is also required by the NPSUD;
 - (d) Contributing to achieving critical mass to support greater local retail/service provision, including the community's vision for a renewed Rolleston Town Centre; and
 - (e) The one-off economic stimulus associated with developing the land and constructing the dwellings that will be enabled there.
- 2.6 Conversely, the main economic cost is the loss of the land for rural production. However, since the land requires significant and costly irrigation to be used for agriculture/horticulture (as set out in the evidence of Mr Mthamo), this opportunity cost is minimal (as reflected in its current land value).
- 2.7 Given the strong and enduring benefits of the proposed plan change, and noting the absence of any material economic costs, I support it on economic grounds.

3 ABOUT THE PROPOSED PLAN CHANGE

- 3.1 Plan Change 67 (*PC67*) seeks to rezone 33.4 hectares of Inner Plains Rural Land in West Melton to create 130 low density residential sites.
- 3.2 The map below identifies the location of the site for context. In short, it is located immediately south, and hence will form a logical extension, of the Wilfield subdivision, which was also developed by the applicant for this plan change.

Figure 1: Location of the Subject Site



4 THE NEED FOR THE PLAN CHANGE ACCORDING TO THE NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

- 4.1 The National Policy Statement On Urban Development 2020 (*NPSUD*) came into effect in August 2020. Like its predecessor, the *NPSUDC* 2016, the *NPSUD* requires Councils in high growth areas to provide (at least) sufficient development capacity to meet expected future demand for additional dwellings over the short, medium, and long-term.
- 4.2 In addition, the *NPSUD* imposes strict monitoring and reporting requirements to ensure that any likely capacity shortfalls are identified and rectified as soon as possible.
- 4.3 The *NPSUD*'s requirements for monitoring and providing at least sufficient development capacity vary across three tiers, with the strictest requirements imposed on Councils in tier 1 urban environments. These represent the highest-growth areas, and where capacity shortfalls have historically been the most acute.

- 4.4 Selwyn district comprises part of the Greater Christchurch Tier 1 urban environment and is therefore required to complete a detailed housing and business development capacity assessment (*HBA*) every three years. The HBA synthesizes a raft of information about the supply and demand for new dwellings to ensure that sufficient capacity is being provided in the right places at the right time to keep pace with demand.
- 4.5 On 30 July 2021, the Greater Christchurch Partnership (*GCP*) published its latest HBA for its three partner Councils: Christchurch City, Selwyn District, and Waimakariri District.
- 4.6 The table below summarises the estimated feasible capacity and projected future demand for additional dwellings in Selwyn according to the latest HBA for three different capacity scenarios:
- (a) excluding Rolleston's future development areas (*FUDAs*) (which were identified in the 2018-2048 Our Space strategy);
 - (b) including Rolleston's *FUDAs* at a density of 12.5 households per hectare; and
 - (c) including Rolleston's *FUDAs* at a density of 15 households per hectare.

Table 1: Selwyn District Feasible Capacity and Dwelling Demand in Latest HBA

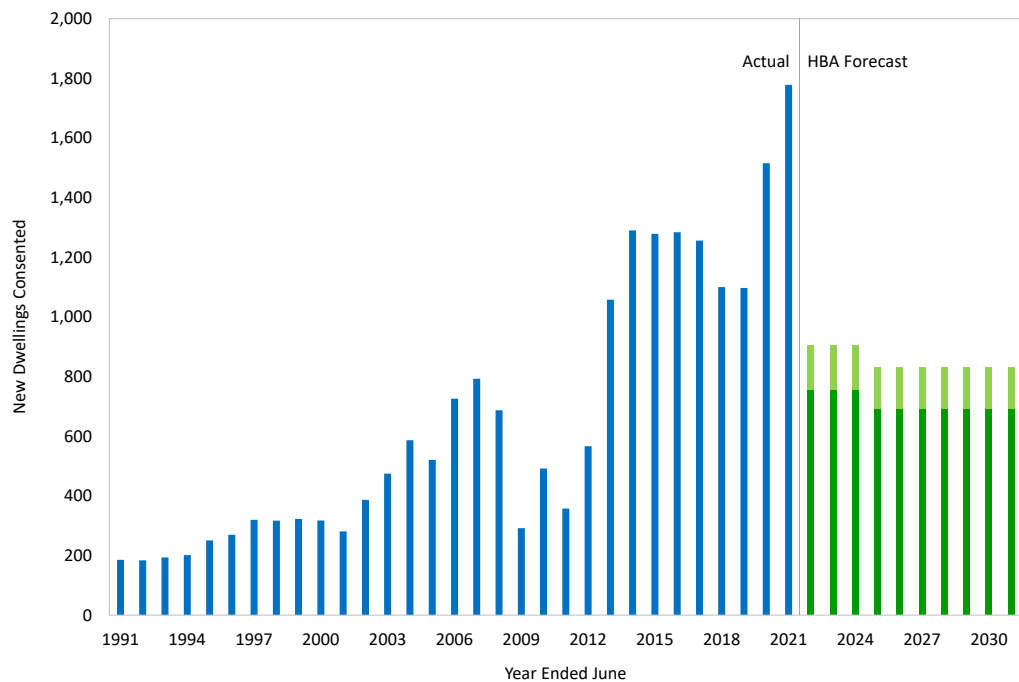
Scenario 1: Excluding Future Urban Development Areas (FUDAs)			
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,578	2,714	1,864
Medium term	6,452	8,541	2,089
Long term	6,452	25,338	18,886
Scenario 2: Including Future Urban Development Areas (FUDAs) @ 12.5 hh/ha			
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,578	2,714	1,864
Medium term	12,208	8,541	3,667
Long term	12,208	25,338	13,130
Scenario 3: Including Future Urban Development Areas (FUDAs) @ 15 hh/ha			
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,578	2,714	1,864
Medium term	13,502	8,541	4,961
Long term	13,502	25,338	11,836

- 4.7 Table 1 shows that, when the *FUDAs* in Rolleston are excluded, the latest HBA reveals a significant shortfall in feasible district dwelling capacity

over both the medium-term (3 to 10 years) and long-term (10 to 30 years). When those new growth areas are included, however, the medium-term shortfall disappears leaving only long term deficits.

- 4.8 While these latest dwelling supply/demand figures imply no short-term need to provide additional dwelling capacity to meet demand, there are several compelling reasons why this is unlikely to be the case.
- 4.9 First, the capacity requirements set out in the NPS are minima, not targets. Thus, even if a Council appears to have “sufficient” capacity to meet demand, that does not negate the benefits of providing additional capacity. The opposite is generally true. Thus, all other things being equal, the greater the capacity provided, the greater the degree of land market competition and the more efficiently that the market operates (for the wider benefit of the community).
- 4.10 Second, the Council has used the FUDA’s as part of its medium term capacity despite the fact that the capacity definitions in section 3.4 of the NPSUD require areas to be zoned under either an operative or proposed district plan, which I understand is not the case for the FUDAs in Rolleston.
- 4.11 Third, the Council’s estimates of future dwelling demand appear very conservative. Specifically, the HBA assumes short-term demand for only 2,714 new dwellings over the next three years, and only 8,541 over the next 10 years (both including 20% competitiveness margins). These equate to annual run rates of about only 900 dwellings over the short term, and 850 over the medium term.
- 4.12 By contrast, the latest building consent data published by Statistics New Zealand show that nearly 1,800 new dwellings were granted in Selwyn during the 12 months ended June 2021, which is double the assumed short-run rate of only 900.
- 4.13 Figure 2 provides more details. It compares the HBA’s projected dwelling demand to 2031 (the green bars) to actual district building consents granted since 1991 (the blue bars). The light green segments at the top of the HBA forecast bars represent the NPSUD competitiveness margins.

Figure 2: Recent Building Consent Volumes vs HBA Demand Estimates



4.14 Clearly, the HBA's forecasts of short- to medium-term future growth defy recent trends and thus almost invariably understate the true extent of future demand. When the competitiveness margins (i.e. the light green bits at the top of the HBA bars) are stripped out to make it a like-for-like comparison with the blue bars (which are raw consent numbers and thus exclude any margins), this anomaly becomes even more stark.

4.15 Not only does the HBA for Selwyn adopt inexplicably low estimates of demand, but its estimates of feasible capacity (to meet that demand) appear grossly overstated. There are several issues at play here, which I now work through one by one.

4.16 First, when calculating the feasible capacity for new dwellings still residing in existing greenfield areas, which account for most of the short-run supply, the modelling assumes that only 25% of such land will be used for infrastructure (such as roads, parks, and reserves). Thus, it assumes that 75% of the land will be available for development.¹

4.17 To ground-truth this assumption, I reviewed a recent, detailed report on residential development densities by Harrison Grierson, which was

¹ See page 42 of the HBA (30 July 2021).

commissioned by the GCP.² It profiles the development outcomes achieved across various recent greenfield subdivisions, several of which were in Greater Christchurch.

4.18 I extracted data from that report to identify the proportion of land in each subdivision used for residential dwellings versus commercial uses or infrastructure. The results are tabulated below, and show that only 60% of greenfield land is typically available for new housing, not 75% as the HBA modelling suggest.

Table 2: Land Use Coverage Ratios in Recent Greenfield Subdivisions

Greenfield Development	Residential	Commercial	Infrastructure	Total
Spring Grove (Belfast, Christchurch)	53%	0%	47%	100%
Golden Sands (Papamoa, Tauranga)	58%	1%	41%	100%
Huapai Triangle (Kumeu, Auckland)	58%	1%	41%	100%
Longhurst (Halswell, Christchurch)	63%	2%	35%	100%
Greenhill Park (Chartwell, Hamilton)	53%	0%	47%	100%
Faringdon (Rolleston, Selwyn)	63%	1%	36%	100%
Sovereign Palms (Kaiapoi, Waimakariri)	71%	1%	28%	100%
Average	60%	1%	39%	100%

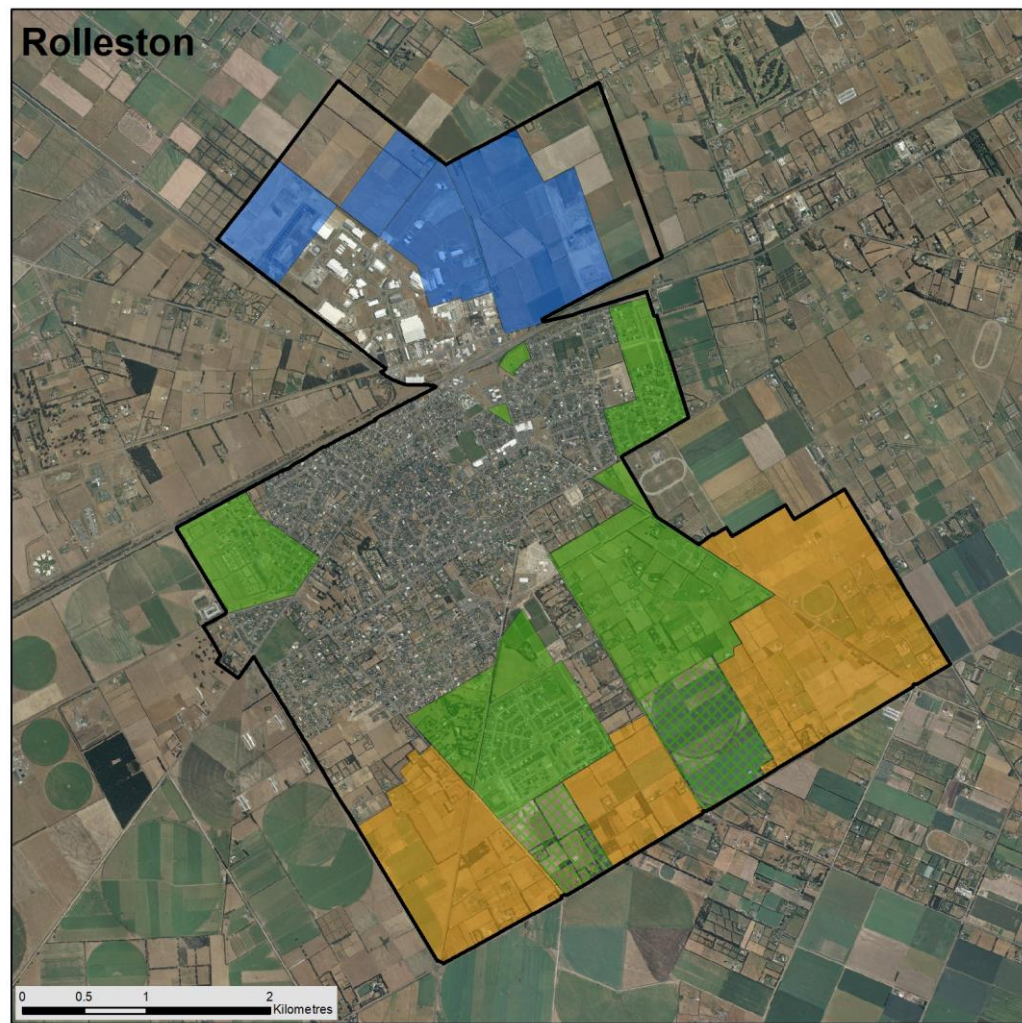
4.19 I acknowledge that the proportion of land available for residential development varies across the case study areas in Table 2, and I also understand that geotechnical conditions are a key driver. For example, in low-lying, flood prone areas, more land is generally needed for stormwater management, with less required in more elevated and well-drained areas.

4.20 Based on discussions with Mr Wheelans, who has developed more than 2,700 sections across Greater Christchurch over the last 10 to 15 years, I understand that a net yield of 65% is more likely to reflect future development outcomes across Selwyn district, not the 75% assumed in the HBA. I return to this point shortly.

4.21 Yet another issue with the Council's estimates of feasible capacity relate to the FUDAs identified in the 2018-2048 Our Space Strategy, which are represented by the orange blocks in the map below.

² https://www.selwyn.govt.nz/_data/assets/pdf_file/0005/475466/UG-Chapter-Appendix-3-HG-Greenfield-Density-Analysis.pdf

Figure 3: Map of Rolleston Future Urban Development Areas (FUDAs)



- 4.22 According to the HBA, these FUDAs can accommodate an additional 5,756 to 7,050 dwellings at densities of 12.5 and 15 dwellings per hectare, respectively.
- 4.23 While the HBA is not explicit about the land area underpinning these estimates, the lower figure translates to approximately 460 hectares of developable land, while the higher equates to about 470 hectares.
- 4.24 To verify the amount of land contained within the FUDAs, which seem to differ between the HBA's two density scenarios, I used Canterbury Maps to trace their outlines. The results show that these FUDAs span roughly 462 hectares in total.
- 4.25 Herein lies the problem. As discussed just above, only about 70% of the land in these FUDAs will be available for residential development, with the rest required for roads, reserves, and other infrastructure.

Consequently, the estimates of feasible capacity residing in the FUDAs need to be scaled down by 30% to reflect the use of greenfield land for other activities – such as infrastructure – that enable residential development to occur in the first place. This, in turn, will have a profound impact on the perceived sufficiency of the district's capacity to meet the demand for new homes.

- 4.26 Another significant issue that seriously undermines the veracity of the HBA's estimates of feasible development capacity is the profit margin that is assumed to be required by developers.
- 4.27 According to official guidance published by MBIE, feasibility assessments should adopt a minimum development margin of 20%. In my experience, this is about right, although many developers target a higher return of around 25% to reflect the significant risks associated with large scale property development.
- 4.28 The analysis underpinning the latest HBA for Selwyn, however, adopts a far lower development margin of only 6.6%. This much smaller margin, in turn, lowers the financial hurdle required for hypothetical developments to be considered commercially feasible, and therefore directly overstates likely future dwelling supply.
- 4.29 Interestingly, bullet 2 in appendix 3 of the HBA acknowledges that a 20% development margin is recommended by MBIE, but notes that the assessment has departed from it *"to better recognize local and actual market parameters."*
- 4.30 I am unaware of any basis for this assertion. Indeed, I am unaware of any developers in the Greater Christchurch area that would risk millions of dollars of their own capital to potentially earn a 6.6% development margin. Nor am I aware of any lenders that would inject capital into a venture where the profit margins are so thin and hence the project is at risk of potential default. Accordingly, I dug deeper to better understand the origins of this rather unusual and potentially misleading assumption.
- 4.31 My query was answered on page 50 of the HBA, where the authors cite data from Stats New Zealand, which allegedly showed a development margin of only 6.6% for house construction.

- 4.32 I then obtained a copy of that data from Stats NZ and identified the 6.6% figure to put it in context. Regrettably, the HBA's authors appear to have mistaken two similar but entirely different financial metrics.
- 4.33 The first metric is the development margin, which is the profit that a developer seeks to earn over and above their costs for a given project. The second is net profit after tax, or NPAT, which measures the profit earned by a venture when all costs – including tax – are deducted.
- 4.34 In short, it appears that the HBA's authors have mistakenly used the NPAT figure from those financial data and assumed that it equals the developer margin. However, NPAT accounts for a wide range of costs that do not feed into the calculation of developer margins, such as fixed operating costs, depreciation, amortization, and income tax.
- 4.35 The upshot of all this is that the HBA has used an inordinately low developer margin to calculate the commercial feasibility of building new homes in the district, and therefore has significantly overstated the true extent of feasible development capacity. These figures are at least an improvement on previous iterations, however, which oddly assumed that all plan-enabled capacity would be commercially feasible to develop.
- 4.36 To summarise, not only has the HBA understated likely future demand, but its estimates of feasible capacity are grossly overstated for several reasons. Collectively, these issues mean that the forecast shortfall in capacity identified in the HBA is likely to occur far sooner than expected.
- 4.37 However, that is not all. There is still yet another pressing issue. It relates to the relationship between feasible capacity, which is reported in the HBA, and likely market supply (which is ultimately tasked with meeting increased demand over time).
- 4.38 In short, while feasible capacity is an interesting metric, it should not be confused with market supply. There are several reasons why feasible capacity may not form part of market supply, particularly over the short to medium term. They include:
- (a) *Developer intentions* - some landowners have no clear intention to develop in the short to medium-term, nor to sell their land to others who may wish to develop it.

- (b) *Tax implications* – I understand that greenfield land owners are liable for taxes on recent land value uplifts caused by rezoning. These taxes are greatest in the first year following the rezoning, but gradually diminish over time and then cease 10 years later. In some cases, efforts to avoid or minimise these taxes could cause land to be withheld from the market for up to a decade.
- (c) *Land banking and drip-feeding* – other landowners intend to develop in future, but are currently withholding supply to capitalise on inevitable land price inflation, while some are drip-feeding supply to maintain prices and hence maximise returns.
- (d) *Site constraints* – the Council’s estimates of likely supply appear to consider only infrastructure as a potential site constraint and therefore overlook other factors that affect developability, such as contamination or awkward site shape/topography.
- (e) *Operational capacity* – some landowners face operational capacity constraints, which limit the number of new residential lots that they can supply per annum.
- (f) *Financing* – similarly, some landowners face capital/financing constraints that also limit their ability to supply.

4.39 Given these various market forces, it follows that actual market supply will only ever be a modest proportion of feasible capacity, and hence that reliance on “just enough” feasible capacity to meet demand will invariably lead to significant and prolonged market shortages.

4.40 To provide a more reliable basis for assessing the adequacy, or otherwise, of the district’s current land supply, I recreated my table 1 above to reflect the various supply/demand issues just discussed.

4.41 These revised supply/demand estimates take Table 1 as their starting point, and incorporate the following adjustments:

- (a) Short-term demand equals 80% of the number of new consents granted in the district over the last 5 years (plus a 20% competitiveness margin).

- (b) Medium term demand equals 70% of the number of new consents granted in the district over the last 5 years (plus a 20% competitiveness margin).
- (c) Long term demand equals 60% of the number of new consents granted in the district over the last 5 years (plus a 15% competitiveness margin).
- (d) The FUDAs are excluded from medium-term capacity because they do not meet the definitions in section 3.4 of the NPSUD.
- (e) 65% of land residing in existing and future greenfield areas will be available for residential development, with the other 35% used for roads, reserves, and commercial activities.³
- (f) Likely market supply equals 60% of short-term feasible capacity, 75% of medium-term, and 90% of long-term. This reflects the fact that the various market constraints identified at paragraph 4.38 above are typically more acute in the short-term but less so in the longer term.
- (g) No adjustments are made for the inordinately low developer margin of 6.6% because it is impossible to identify the impacts on feasible capacity. Accordingly, my revised totals continue to overstate feasible capacity and hence likely market supply.
- (h) Sufficiency is based on the relationship between demand and likely market supply, not demand and feasible capacity.

4.42 Baring these adjustments in mind, Table 3 presents my revised dwelling supply/demand estimates for the district.

³ Further, 80% of existing feasible capacity is assumed to be within the district's greenfield areas, and 20% within infill areas.

Table 3: Revised Dwelling Supply/Demand Estimates

Scenario 1: Excluding Future Urban Development Areas (FUDAs)				
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Likely Market Supply</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,090	2,454	3,886	-1,432
Medium term	5,764	4,323	11,819	-7,496
Long term	5,764	5,187	30,438	-25,251
Scenario 2: Including Future Urban Development Areas (FUDAs) @ 12.5 hh/ha				
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Likely Market Supply</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,090	2,454	3,886	-1,432
Medium term	5,764	4,323	11,819	-7,496
Long term	9,505	8,555	30,438	-21,883
Scenario 3: Including Future Urban Development Areas (FUDAs) @ 15 hh/ha				
<u>Timeframes</u>	<u>Feasible Capacity</u>	<u>Likely Market Supply</u>	<u>Demand incl buffer</u>	<u>Surplus/Shortfall</u>
Short Term	4,090	2,454	3,886	-1,432
Medium term	5,764	4,323	11,819	-7,496
Long term	10,346	9,312	30,438	-21,126

4.43 Table 3 confirms that, when the Council's supply and demand estimates are revised to better reflect reality, there are significant shortfalls across all three timeframes. Accordingly, additional supply needs to be identified and rezoned as soon as possible (despite the findings of the HBA). Otherwise, the likely prolonged supply shortfalls will place undue pressure on house prices, which undermines affordability and limits the district's strong growth potential.

5 THE COST AND BENEFITS OF THE PLAN CHANGE

5.1 Having established above that there is a pressing near-term need to identify and rezone additional land to meet forecast growth in demand, I now consider the likely economic costs and benefits of the plan change.

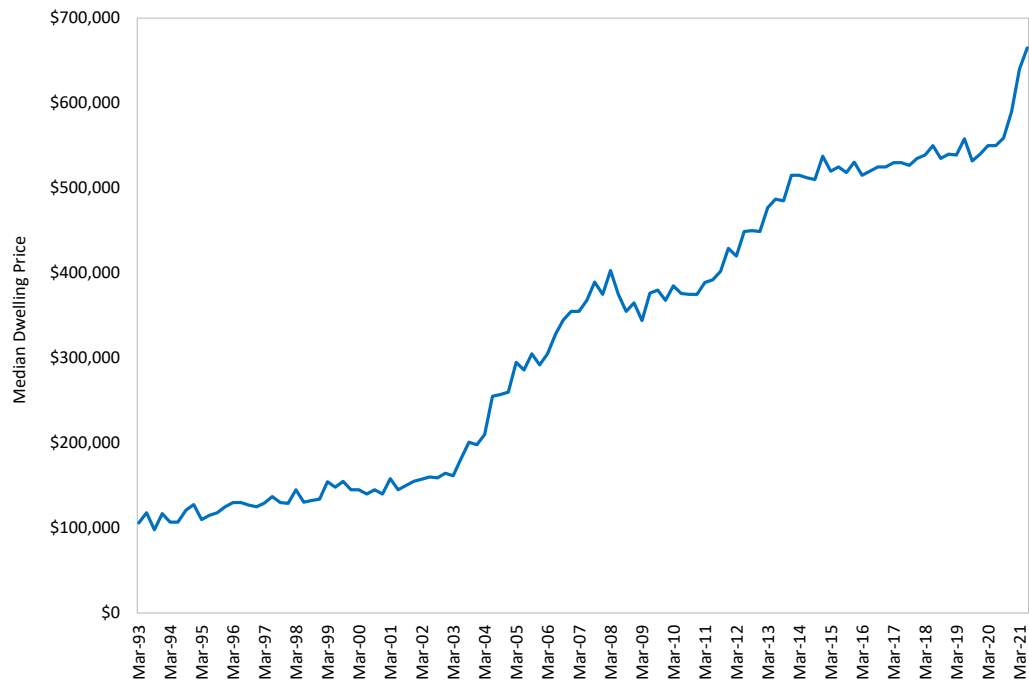
Boost in Market Supply

5.2 Perhaps somewhat obviously, the proposed plan change will provide a direct boost in the district's dwelling capacity, thereby helping to narrow the gap between likely future supply and demand.

5.3 All other things being equal, this supply boost will help the market to be more responsive to growth in demand, thereby reducing the rate at which district house prices grow over time (relative to the status quo).

- 5.4 Further, although the district's housing has been reasonably affordable compared to other parts of New Zealand in the past, its prices have surged recently. This is illustrated in the chart below, which incorporates the latest data published under the NPSUD to 30 June 2021.

Figure 4: Selwyn District Median Dwelling Prices (from NPSUD Data)



- 5.5 Figure 4 confirms that district dwelling prices have increased steadily over time, but recently shot up after a prolonged period of consolidation. In fact, they increased 21% over the 12 months ended 30 June 2021, which will likely be starting to reduce affordability.
- 5.6 Even prior to this recent spike in house prices, district housing had started to become relatively unaffordable. For example, the latest affordability report by Core Logic (as at December 2020) showed that the median house price was nearly six times the median household income. By comparison, the benchmark for affordability is a ratio of only three.
- 5.7 In addition, the latest Core Logic report showed that it takes about 7.7 years to save the deposit for a new home in Selwyn. Thus, not only are house prices themselves increasingly unaffordable, but even the task of saving the deposit for a new home is an onerous task that is staring to become well beyond the reach of many households.

- 5.8 The plan change directly responds to this need for additional dwelling capacity by enabling the development of approximately 130 new homes over time.
- 5.9 In my view, and from an economic perspective, this represents a significant boost in supply. To assess whether this satisfies the definition of “significant” in clause 3.8 of the NPSUD (which relates to unanticipated or out-of-sequence plan changes), I reviewed the latest HBA. At page 10, it discusses consultation with the development community (during the course of writing the HBA) and describes landowners that could develop 20 or more dwellings as being significant.
- 5.10 As such (and particularly taking into account the shortfalls I have described), I consider that the proposed development of approximately 130 dwellings on the subject site represent a significant increase in capacity for the Selwyn district, from both an economic and market perspective and by virtue of the way that term is used in the HBA (and by extension how it might be considered for the purposes of clause 3.8 of the NPSUD).
- 5.11 To put the supply boost in context, I note that the 130 new lots provided would increase likely short-term district supply by 5.3%, and medium term by 3%.⁴ I consider this a significant contribution, especially from just one development. Expressed another way, the 130 lots would contribute 9% to the short term district supply shortfall.
- 5.12 The proposal’s significance becomes even clearer when it is placed in the context of the submarket for rural-residential dwellings, in which West Melton competes. This is illustrated in the table below, which is from a recent memo by Formative to SDC. It shows that there is existing capacity for only 158 extra dwellings across West Melton and Prebbleton. The PC67 proposal would boost this by 82% (from 158 to 288).

⁴ Based on the likely short term supply estimate of 2,454 dwellings in Table 3, and the medium term figure of 4,323.

Figure 5: Latest Capacity Estimates from Memo to SDC (July 2021)

Figure 4: Selwyn District Capacity Assessment – as at June 2021

Sub areas - Urban zones only	2019	Uptake*	2021
Rolleston	3,506	1,489	2,017
Lincoln	1,842	375	1,467
West Melton and Prebbleton	238	80	158
Darfield and Leeston	970	34	936
Urban Areas	6,556	1,978	4,578
Minor settlements and Rural	1,073	428	645
Total Selwyn District	7,629	2,406	5,223

**some of the uptake in the Rural areas will have occurred in rural zones.*

5.13 As set out in further detail below, the current lack of any available sections for development in West Melton means the supply enabled by the proposed plan change is even more “significant” in that location.

Land Market Competition

5.14 In addition to directly boosting district dwelling capacity, the proposed plan change will also help to foster competition in the local land market. This is important because, as recognised through objective 2 of the NPSUD, competition is the cornerstone of economic efficiency. When the land market becomes more competitive, land developers have a greater incentive to get their product to the market in a more timely and cost-effective manner, thus further helping to keep district housing as affordable as possible.

5.15 Absent competition, land owners experience “market power”, which enables them to charge more for land and be slower in releasing it to the market. Both outcomes conspire against affordability and reduce the overall efficiency of the housing market. Indeed, this sort of market power is likely to explain some of the rapid growth in land and dwelling prices over the last 12 months, as shown in Figure 4 above.

5.16 Moreover, not only do the direct boost in supply and increased land market competition (discussed above and created by the proposal) have direct economic benefits by making land and dwellings more affordable than they would have been otherwise, but they can also have broader impacts.

5.17 Specifically, by reducing the rate at which dwelling prices grow, future residents will spend less on weekly rent or mortgage payments than they would have otherwise, which will boost disposable incomes. With a significant proportion of that extra money likely to be spent locally, lower future dwelling prices (relative to the status quo) will also create additional economic stimulus for the wider benefit of the local area through increased household spending over time.

Helps Provide for a Range of Housing Typologies

5.18 The NPSUD requires high growth areas, like Selwyn, to not only provide at least sufficient capacity to meet future demand in aggregate, but to also provide a range of housing typologies to meet a wide range of needs and preferences.

5.19 This is shown in the excerpt below, which displays the first part of policy 1 of the NPSUD:

Table 4: Policy 1 of the NPSUD

<p>2.2 Policies</p> <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and</p>

5.20 As most readers will be aware, sections and dwellings in West Melton are fundamentally different from other parts of the district, particularly the more urbanised areas of Rolleston and Lincoln. This is also noted by Mr Sellars, including at para 5.2 of his evidence.

5.21 To illustrate these differences, I used Property Guru to extract information on every residential property sold in West Melton, Lincoln, or Rolleston over the last 2 years. Then, I compared them across four key dimensions, namely:

- (a) Average land area;
- (b) Average building area;
- (c) Development intensity (as measured by the floor area ratio); and

(d) The number of bedrooms.

5.22 Table 5 presents the results of this exercise, which confirm that West Melton dwellings are markedly different from those in Rolleston and Lincoln. Specifically, West Melton homes:

- (a) Are larger in size (270m² vs 190 to 200m²);
- (b) Sited on much larger sections (1895m² vs 775 to 825m²);
- (c) Achieve much lower development intensities (0.14 vs 0.24); and
- (d) Contain more bedrooms on average (4.1 vs 3.5).

5.23 In addition, as noted by Mr Sellars, West Melton homes are more expensive than those in Rolleston and Lincoln, and they are also increasing at faster rate.

Table 5: Property Guru Dwelling Comparison: West Melton vs Rolleston & Lincoln

Townships	Average Land Area (m ²)	Average Dwelling Size (m ²)	Floor Area Ratio	Average # of Bedrooms
Lincoln	825	200	0.24	3.5
Rolleston	775	190	0.24	3.5
West Melton	1,895	270	0.14	4.1

5.24 Perhaps somewhat unsurprisingly, 2018 Census data also reveal that West Melton residents and households differ markedly (on average) from those in Rolleston or Lincoln.

5.25 Specifically, compared to Rolleston and Lincoln, West Melton residents are more likely to:

- (a) Identify as European (86% vs 78%) but less likely to identify as Asian or Māori (10% vs 17%);
- (b) Be of Christian faith (42% vs 34%);
- (c) Be partnered (82% vs 72%);
- (d) Be self-employed or an employer (18% vs 11%);
- (e) Work as a professional or manager (53% vs 40%);
- (f) Earn more than \$70,000 per annum (37% vs 26%); and

(g) Own their home rather than rent it (95% vs 80%).

- 5.26 Given the clearly divergent characteristics of West Melton dwellings, residents, and households, it follows that the proposed plan change helps meet the NPSUD requirement to provide a range of typologies to meet the preferences of a diverse resident population.
- 5.27 This seems particularly important because, according to my recent searches of online real estate websites, there are no sections left in West Melton.
- 5.28 For example, Trademe property found only two sections listed for sale in West Melton, but both are now on hold as the sale processes are completed. Both are located in the Wilfield subdivision, of which the proposed plan change forms a logical extension. As noted by Mr Sellars, the last 16 sections released in the adjacent Wilfield subdivision sold out within two hours at prices that were about 50% higher than 1 year ago.
- 5.29 Accordingly, not only does the proposal make a significant contribution to both West Melton, specifically and the district overall (as per para 5.11), but it also helps give effect to policy 1, which requires Council's to provide various housing choices to meet a diverse range of needs and preferences.

Critical Mass to Support Greater Local Retail/Service Provision

- 5.30 Currently, Selwyn district residents rely heavily on centres in Christchurch City to meet their daily household needs. For example, using detailed Marketview data provided to us by Waimakariri District Council on a recent, separate matter, the table below shows the destination of Selwyn district resident spend in 2019.

Table 6: Destination of Selwyn District Resident Spend in 2019

Spending Categories	Selwyn District	CHCH City	Rest of Region	Rest of NZ	Total
Apparel and Personal	15%	73%	3%	10%	100%
Cafes, Restaurants, Bars, Takeaways	31%	47%	6%	15%	100%
Department Stores and Leisure	16%	73%	3%	8%	100%
Fuel & Automotive	44%	40%	8%	8%	100%
Groceries & Liquor	50%	39%	4%	6%	100%
Home, Hardware & Electrical	10%	80%	3%	6%	100%
Other Consumer Spending	18%	58%	6%	18%	100%
All Categories	34%	52%	5%	9%	100%

- 5.31 Table 6 shows that only a third of Selwyn resident spend is retained in the district, with more than half leaking out to Christchurch City. While some of that city spending may occur before, during, or after working there, others reflect specific trips.
- 5.32 By enabling the resident population to grow, including via additional development on the subject site, the district will eventually be able to support greater local retail/service provision and hence be less reliant on the city to meet its household needs.
- 5.33 This, in turn, will not only support greater district economic activity and hence employment, but also reduce vehicle travel and the harmful emissions associated with it.
- 5.34 More specifically, greater district critical mass – including at the subject site – will help the Council and community to realise its ambitions for a renewed Rolleston Town Centre, thereby elevating its current status as a lower-order KAC to a fully-functioning town centre that fulfils a wider range of roles and functions.

One-Off Economic Stimulus

- 5.35 The processes associated with finalizing site planning/design/consent, preparing the land for development, installing necessary infrastructure, and then constructing and fitting out the 130 new homes enabled by the proposal will generate significant one-off economic impacts.
- 5.36 I quantified the likely one-off economic impacts of this activity using a technique called multiplier analysis, which is based on detailed matrices called input-output tables. These tables describe the various supply chains that comprise an economy, and therefore enable the wider economic impacts of a change in one sector (or sectors) to be traced through to estimate the overall impacts.⁵

⁵ The multipliers used here are for the Canterbury region, and were derived by my organization. They are widely used by a range of public and private organisations across New Zealand, including Lincoln University.

5.37 These impacts include:

- (a) *Direct effects* – which capture onsite activities directly enabled by the proposal; plus
- (b) *Indirect effects* – which arise when businesses working directly on the project source goods and services from their suppliers, who in turn may need to source good/services from their own suppliers, and so on; and
- (c) *Induced effects* – which occur when a share of the additional wages and salaries generated by the project (directly or indirectly) are spent in the local/regional economy and therefore give rise to additional rounds of economic impacts.

5.38 These economic effects are usually measured in terms of:

- (a) *Contributions to value-added (or GDP)* - GDP measures the difference between a firm's outputs and the value of its inputs (excluding wages and profits). It captures the value that a business adds to its inputs to produce its own outputs.
- (b) *The number of people employed* – this is measured in terms of employment counts, which include both part-time and full-time workers, because Statistics New Zealand does not provide data on full-time equivalent employees (*FTEs*).
- (c) *Total wages and salaries paid to workers*, which are often labelled 'household incomes.'

5.39 Having defined these key terms, the following table shows the estimated economic impacts of the various activities enabled by the proposal.

Table 7: Regional Economic Impacts of Construction

Economic Impact Measures	Direct	Indirect	Induced	Total
Regional GDP (\$ millions)	\$28	\$18	\$10	\$56
Employment (people-years) ⁶	305	200	95	600
Wages/Salaries (\$ millions)	\$16	\$10	\$4	\$30

⁶ One person-year means one person employed for a full year. Hence, 100 people-years could mean 100 people employed for one year, 50 people employed for 2 years, and so on.

5.40 In summary, I estimate that future economic activities enabled by the proposal could boost regional GDP by \$56 million, including flow on effects, generate employment for 600 people years, and generate \$30 million in household incomes.

Foregone Rural Production

5.41 The main potential economic cost of the proposed plan change is the loss of the land for rural production, namely agriculture and/or horticulture.

5.42 However, I understand that the land would be relatively unproductive for such uses absent extensive – and hence expensive – irrigation. As a result, the land is not particularly valuable for such rural production.

5.43 This is reflected in its value, which is currently about \$10 per square metre. By comparison, sections at the adjacent Wilfield development are worth about \$125 per square metre on average. i.e. 12.5 times higher.

5.44 Given the need for irrigation to support rural production, and noting the land's current low value (which reflects such uses), I conclude that this economic cost is relatively immaterial and therefore not a valid reason to deny the plan change.

6 CONCLUSION

6.1 This evidence has shown that the proposed development enabled by Plan Change 67 represents a significant boost in dwelling capacity, which will help keep pace with demand while also helping to meet NPSUD requirements. Overall, the proposal will generate a wide range of enduring economic benefits, but have only minor economic costs via foregone rural production. Accordingly, I support the proposal on economic grounds and see no reason to deny it.

Fraser Colegrave

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