

Technical Memo

To:	Tallulah Parker	From:	Insight Economics
Date:	Friday, 25 July 2025	Page:	5 (including this page)
Subject:	Response to RFI for Whisper Creek Private Plan Change 23		

CONTEXT

LMM Investments Limited has lodged a private plan change (**PPC**) request to enable residential development at Whisper Creek (the **proposal**), including provision for a Neighbourhood Centre to support local convenience needs. We understand that Christchurch City Council (**CCC**) has issued a Request for Further Information (**RFI**), seeking additional analysis of the proposed centre.

To assist, this memo provides further economic input on the following matters raised under Item 3 of the RFI:

1. Location of the proposed Neighbourhood Centre;
2. Appropriate size of the centre;
3. Economic viability; and
4. Implications for accessibility and car dependency if the centre is not delivered.

This response draws on our original economic assessment, dated 1 May 2025, supplemented by additional benchmarking and analysis. We now address each matter in turn.

1. LOCATION OF THE PROPOSED NEIGHBOURHOOD CENTRE

As shown in Figure 3 of our original assessment, the indicative location of the proposed Neighbourhood Centre is positioned centrally within the Whisper Creek development and adjacent to a key internal collector road.

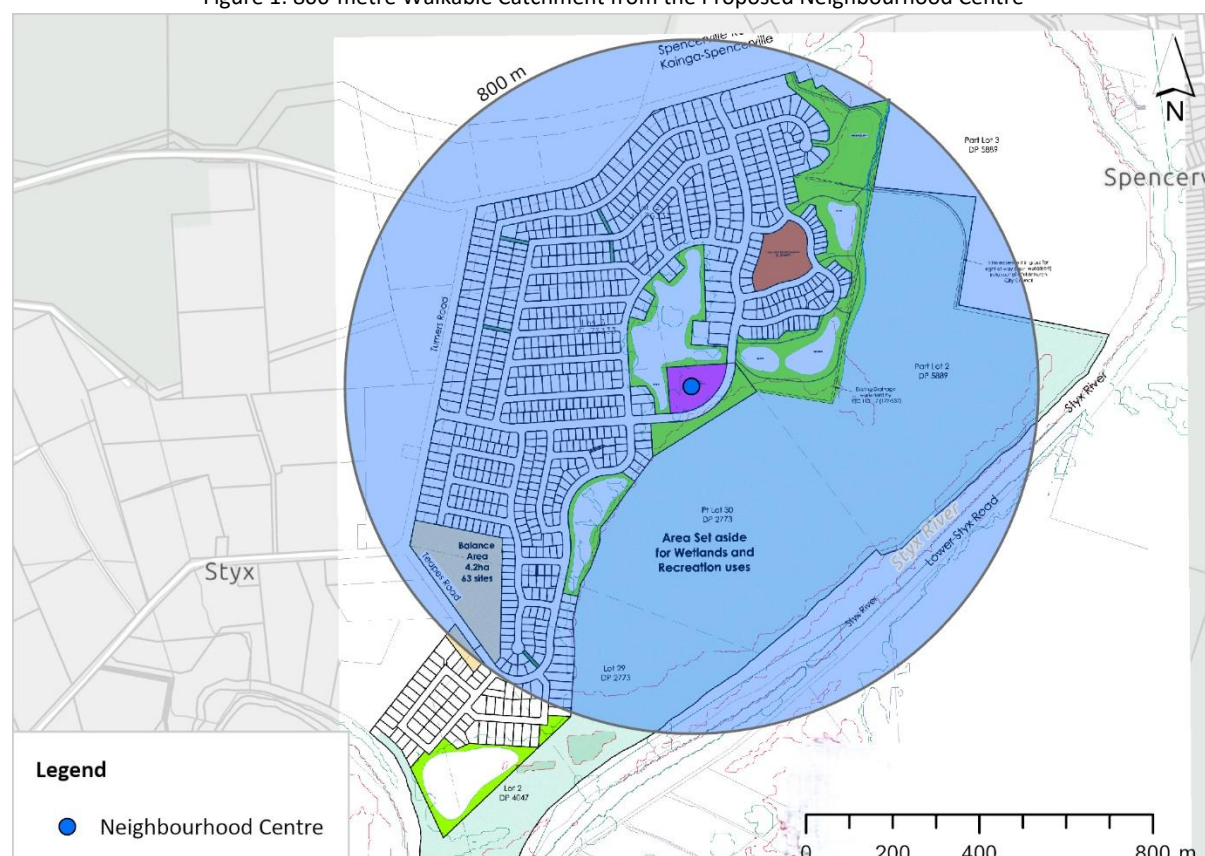
To assess the suitability of the centre's placement, we used a mapping technique known as ped-shed analysis. A pedestrian shed (ped-shed), or walkable catchment, is a fixed-radius buffer used to assess the accessibility of key destinations within a walkable distance. This technique helps evaluate how evenly destinations (such as commercial nodes) are distributed within a neighbourhood and informs optimal facility placement.

Specifically, we georeferenced and scaled the indicative masterplan to align with LINZ Primary Parcel boundaries, allowing for an accurate spatial analysis. An 800-metre radius catchment was then generated from the indicative Neighbourhood Centre location. This walkable catchment aligns with guidance in the Ministry for the Environment's *Urban Design Toolkit*, which defines walkability using 400m (5-minute walk) and 800m (10-minute walk) thresholds.

Figure 1 below overlays the resulting 800-metre catchment (delineated by the blue circle) on the scaled masterplan. The analysis confirms that the Neighbourhood Centre is centrally located and well-positioned relative to the residential layout. The proposed location strikes a balance between

maximising walkable access for the greatest number of future households and integration with the internal recreation and reserve network. While a slight shift westward might marginally increase household coverage, the current placement supports co-location with the open space network, reinforcing the centre’s function as a community focal point, and supporting a more cohesive urban form. This outcome is consistent with the National Policy Statement on Urban Development (**NPS-UD**) objective of enabling well-functioning urban environments.

Figure 1: 800-metre Walkable Catchment from the Proposed Neighbourhood Centre



2. SIZE OF THE PROPOSED NEIGHBOURHOOD CENTRE

The plan change application references a maximum gross floor area (**GFA**) for the proposed centre of 1,500 m², reflecting the retail and hospitality floor area enabled under the operative zoning.¹ This has since been revisited by the project team, with a maximum of 3,000 m² now sought, commensurate with the upper limit anticipated for Neighbourhood Centre Zones (**NCZ**) in the Christchurch District Plan.

To assess the appropriateness of this revised limit, we first benchmarked the city’s existing NCZ provision. Using data from both CCC and Core Logic, we found that roughly 45 hectares of NCZ land served an estimated 149,450 households in 2023, equating to approximately 0.30 hectares per 1,000 households. Applying this ratio to the 800 dwellings enabled at Whisper Creek implies an NCZ land requirement of 0.24 hectares. At the city-wide average floor area ratio (**FAR**) of 0.52, this equates to approximately 1,250 m² of GFA, as set out in Table 1.

¹ i.e. Specific Purpose (Golf Resort)

Table 1: Benchmark of Christchurch NCZ Land

Measure	Value
Total NCZ Land (ha)	45.2
Total Households (2023 CCC estimate ²)	149,450
NCZ Land per 1,000 Households (ha)	0.30
Whisper Creek Households	800
Indicative Whisper Creek NCZ Land (ha)	0.24
Average FAR	0.52
Indicative Whisper Creek NCZ GFA (m²)	1,250

While these benchmarks provide a useful starting point, they are likely to understate supportable provision in peri-urban villages like Whisper Creek, which do not benefit from the more tightly-clustered centres networks typically found in more central locations.

A relevant example is Templeton, a small town on the western outskirts of Christchurch City. It is similar in size to the proposal with around 840 dwellings, with the nearest higher-order centre located approximately four kilometres away at Hornby. According to Core Logic data, Templeton supports approximately 2,070 m² of GFA across roughly one hectare of NCZ land.

Further afield, Tai Tapu is a peri-urban village in Selwyn that is located about six kilometres east of Lincoln. It is around a quarter of the size of the proposal, with about 200 dwellings in the township proper,³ yet supports approximately 2,600 m² of commercial GFA.

These benchmarks indicate that peri-urban villages like that proposed at Whisper Creek typically exhibit higher GFA per household than suburban locations embedded within the wider urban fabric.

Further, the proposed Whisper Creek centre is expected to accommodate community uses such as a preschool, medical centre or allied-health facilities. These activities aid local self-sufficiency, but require relatively high floorspaces / land areas, and would quickly erode a large share of the notional GFA derived from city averages.

In addition to serving future residents of Whisper Creek, the proposed centre will also improve access to convenience and community facilities for existing residents in nearby areas such as Spencerville and surrounding lifestyle blocks, which are currently underserved by larger neighbourhood centres. It will also provide amenity for recreational users of the proposed walking trail network.

In our view, allowing up 3,000 m² of GFA therefore provides an appropriate upper limit that is anticipated by the District Plan and fits comfortably within the centres hierarchy.

The revised GFA cap does not materially change the retail-distribution assessment set out in Section 7 of our original assessment. We remain satisfied that a Neighbourhood Centre of up to 3,000 m² will not adversely affect the role, function or vitality of existing centres for the following reasons:

² Available here: <https://ccc.govt.nz/culture-and-community/statistics-and-facts/facts-stats-and-figures>

³ Excluding the surrounding lifestyle properties

- **Demand-driven growth** – Onsite commercial activity will grow organically over time in response to demand, ensuring that demand and supply remain in balance and reducing the need to attract spending from elsewhere.
- **Scale** – Even at 3,000 m², the centre is modest relative to nearby centres. For example, Belfast Key Activity Centre spans a land area of 7.7 ha; Parklands Local Centre 1.3 ha and Prestons Local Centre 10.7 ha).
- **Dispersed impacts** – Any potential trade diversion is spread across multiple higher-order centres 4–6 km away.
- **Higher-order needs met elsewhere** – People that previously frequented other commercial areas for higher-order shopping will continue to do so as they remain the best places to meet those needs.

3. ECONOMIC VIABILITY OF THE PROPOSED CENTRE

The scale of the proposed residential development provides a self-sustaining customer base for the small commercial node, without the need to rely on trade from other catchments. As outlined in Section 7.5 of our original assessment, the economic viability of the proposed centre is supported by projected household spending within the Whisper Creek development. At full build-out, approximately 800 households are expected to generate around \$69.5 million in annual retail and service expenditure.

While the centre has been sized in such a way to meet local convenience and community needs only, even a modest share of this spending captured onsite would provide the support necessary to sustain a small set of local tenancies.

We expect commercial development to lag residential delivery. In our experience, the first stage of commercial development is unlikely to occur until, say, 300 new homes are occupied, providing a critical mass of customers. Subsequent stages will follow organically as population and demand grow, and development becomes commercially viable.

4. IMPLICATIONS IF THE CENTRE IS NOT DELIVERED

Given the proposal's size and location, we consider it highly likely that the centre will be delivered as the development matures, without the need for prescriptive staging rules.

However, we acknowledge that residents will inevitably rely on established centres for convenience needs until critical mass is reached and commercial activities are established onsite. During this time, future residents will be reliant on private vehicle travel to meet their day-to-day convenience needs. Trip-chaining (e.g. stopping at Belfast while commuting) is a common practice among peri-urban residents and will lessen incremental vehicle kilometres travelled.

Over the medium term, provision of a walkable neighbourhood centre will:

- Reduce reliance on private vehicles for top-up shopping and basic services;

- Improve passive surveillance and social interaction; and
- Support mode-shift objectives in the NPS-UD.

SUMMARY AND CONCLUSION

This brief memo has shown that:

1. The proposed Neighbourhood Centre is centrally located within the development and will maximise walkable access for future households and integrate with the reserve network.
2. Allowing up to 3,000 m² of GFA aligns with the District plan and the functional requirements of the peri-urban site.
3. Retail-distribution effects remain negligible due to the centre's scale, demand-driven growth, and distance to higher-order centres.
4. The centre is likely to be economically viable, with captive spending from the development providing a sufficient local customer base to support a small set of convenience-focused tenancies, without needing to draw trade from other areas.
5. Until the centre is developed, future residents will be reliant on private vehicle travel to meet their day-to-day convenience needs.

I trust that this memo provides all the information that you need for now, but please let me know if you need anything further.

Sincerely,



Fraser Colegrave
Managing Director