

Christchurch City Council: Overview of PC14 Withdrawal Requirements

1. Introduction

- 1.1. This document provides an overview of the key information to support an application under Clause 11 of Schedule 3C of the Resource Management Act – the request to approve the withdrawal of Plan Change 14 (PC14). The information demonstrates how Christchurch City Council meets the ‘key requirement’ that there is sufficient feasible capacity to accommodate adjusted housing demand of over 65,640 commercially feasible dwellings, being the total 30-year high growth scenario household demand, plus an additional 20% (30 years of adjusted demand, clause 11(7)). The operative District Plan enables at least 68,200 commercially feasible dwellings, thereby meeting the “key requirement” for the Minister to approve withdrawal of PC14.
- 1.2. An updated 2025 Housing Capacity Assessment (2025 HCA) is also provided, providing greater detail on the HCA methodology, process and outputs. Fundamentally the 2025 HCA remains the same as previous 2018¹, 2021² and 2023³ HCAs, with only model inputs updated to reflect recently changed parameters.

2. Council decisions on PC14 and concluding urban environment

- 2.1. The Council has made decisions on PC14, resulting in changes to the District Plan to implement the NPS-UD (specifically in and around commercial areas and to incorporate the MDRS in some parts of Christchurch. Broadly, the upzoning enabled through PC14 continues to align with the Council’s long established strategic direction⁴ to ensure housing choice is provided across the city, with greater densities consolidated around commercial centres and along major public transport corridors.
- 2.2. In September 2024, the Council accepted recommendations of the Independent Hearings Panel (IHP), vastly increasing the development potential of Christchurch’s City Centre. New controls enable building heights of up to 45m (previously 28m) with a clear consenting pathway for development beyond this. This provides significant development opportunities for mixed use development across the central city.
- 2.3. In December 2024, the Council accepted recommendations of the IHP regarding the intensification within and around urban commercial centres, as required by Policy 3 of the National Policy Statement on Urban Development (NPS-UD). All commercial centres were intensified, with

¹ 2018 Greater Christchurch Housing Capacity Assessment:

<https://www.greaterchristchurch.co.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-2-Housing-Development-Capacity-Optimized.pdf>

² 2021 Greater Christchurch Housing Development Capacity Assessment:

<https://www.greaterchristchurch.co.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports-2021/Greater-Christchurch-Housing-Development-Capacity-Assessment-July-2021.pdf>

³ 2023 Christchurch Housing Capacity Assessment (via Statement of Primary Evidence of John Scallan in PC14):

<https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/52-John-Scallan-Statement-of-evidence-final.PDF>

⁴ The council’s strategic direction for intensification were established under the Greater Christchurch Urban Development strategy in 2007, reconfirmed under the Greater Christchurch Spatial Plan 2023

development in seven significant centres outside the central city being enabled to between six to ten storeys. High Density Residential zoning was introduced surrounding ten commercial centres, Medium Density Residential zoning was introduced around some 30 other commercial centres, with over 100 neighbourhood commercial centres also up-zoned.

2.4. On 3 September 2025⁵ the Council accepted the IHP recommendations for the Medium Density Residential Zone⁶, but limited this to the spatial extent required to meet the “key requirement” for the Minister to approve withdrawal of the balance of PC14. Those areas zoned as Medium Density Residential were made operative on 19 September 2025. In accepting further recommendations of the IHP, the Council made operative changes to some chapters and provisions, including those that related to qualifying matters and area specific rules. The adopted extent of the Medium Density Residential zone include:

- The existing extent of the Residential Medium Density Zone (except for areas at risk from coastal hazards).
- The existing extent of the Residential Suburban Density Transition Zone (except for areas at risk from coastal hazards).
- Areas of the Residential Suburban Zone around larger centres and along parts of the transport corridors connecting these centres.

2.5. **Concluding Urban Environment** - The September-December 2024 and September 2025 decisions on PC14, together with zones already established through the 2017 District Plan Review, enables significant housing choice across urban zonings. A summary of the zones and overlays made operative through PC14 is provided in Attachment A. When compared to pre-PC14 zoning extents, the quantum of medium density zoning has increased by 50%, now making up almost a quarter of all residential zones. High density zoning has increased 6-fold, and where previously only contained within the central city, is now expanded to encompass an additional nine of the city’s most significant commercial centres and their surrounds. For a statistical overview of zone changes see Attachment B.

3. Summary of Housing Sufficiency

3.1. The 2025 HCA follows the approach for producing a HCA under subpart 5 of the National Policy Statement on Urban Development (NPS-UD), adjusted to comply with the definition of “30 years of adjusted housing demand” (Schedule 3C clause 11(7))—

(a) *the expected demand for housing in Christchurch over a 30-year period, based on—*

(i) the most recent high-growth household growth projections for Christchurch City published by Statistics New Zealand; and

(ii) any reasonable extrapolations necessary to reflect a 30-year period; and

(b) *an additional 20% of demand, over and above the expected demand described in paragraph (a).*

⁵ https://christchurch.infocouncil.biz/Open/2025/09/CNCL_20250903_AGN_8627_AT_WEB.htm

⁶ https://christchurch.infocouncil.biz/Open/2025/09/CNCL_20250903_MIN_8627_AT_WEB.htm

3.2. Table 1 details the adjusted housing demand for Christchurch:

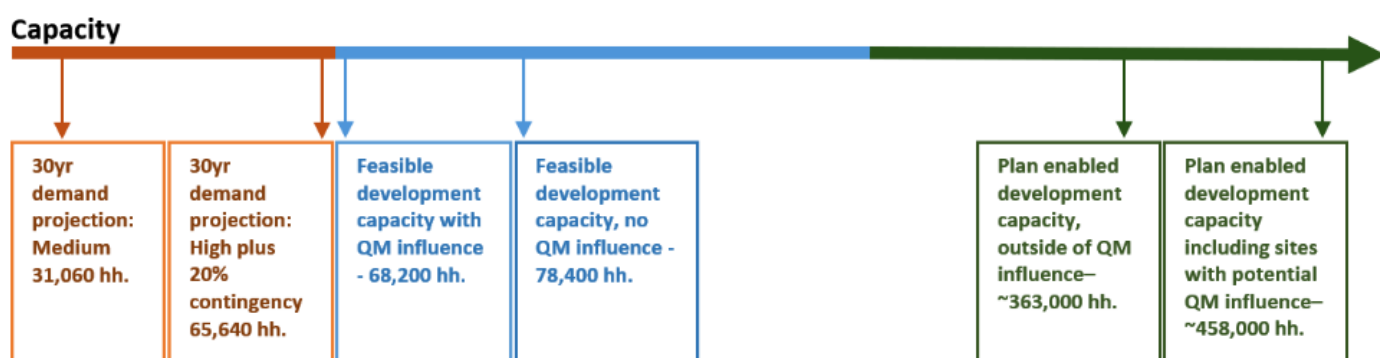
Table 1: Key requirement for Adjusted 30yr Housing Demand projection	
Projection measure	Dwellings
High growth projection	54,700
High growth projection plus 20%	65,640

3.3. Plan enabled and feasible housing capacity has been calculated across all (operative) urban zones following Council PC14 decisions. Housing capacity is assessed in three parts:

- remaining greenfield subdivision capacity;
- high density and select mixed use capacity, and
- a modelled assessment of medium density intensification capacity.

3.4. Housing capacity from all assessed sources is estimated in Table 2. The overall housing sufficiency as measured against the 'key requirement' is illustrated in the spectrum diagram below.

Table 2: Housing Capacity Total	
Capacity measure	Sum
Plan-enabled	458,000
Feasible	68,200



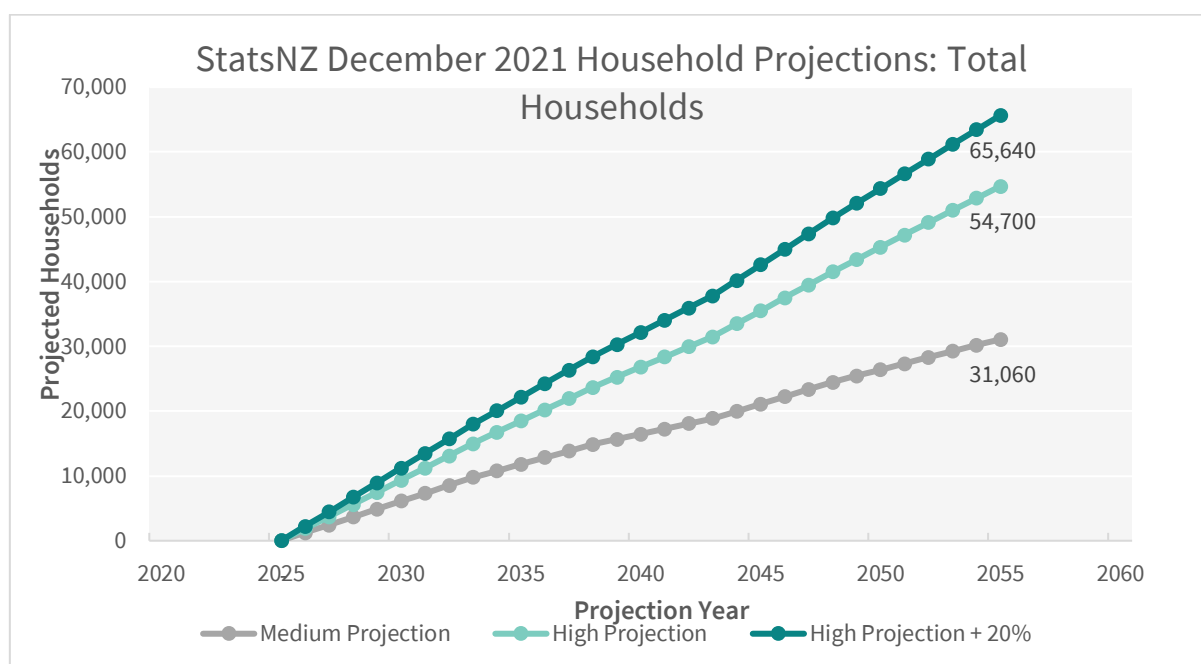
4. Housing Demand – Christchurch City Urban Area

4.1. The Statistics New Zealand (StatsNZ) high population 30 year growth projections, with a 20% margin, are provided in Table 3 and depicted graphically below. Historically and consistently, Christchurch has closely tracked the StatsNZ mid-range projections⁷. For comparison, the projections for both the medium and high growth projections over the short, medium and long term are provided in Table 3. This comparison has been provided for assurance that housing sufficiency,

⁷ [https://www.stats.govt.nz/methods/population-statistics-user-guide/#:~:text=Accuracy-,Overview,\(deaths\)%2C%20and%20migration.](https://www.stats.govt.nz/methods/population-statistics-user-guide/#:~:text=Accuracy-,Overview,(deaths)%2C%20and%20migration.)

as required under the National Policy Statement for Urban Development, will not be an issue for the city in the short, medium or long term.

Table 3: Household Growth Projections. Christchurch City TA area.			
Growth projection	Short (5 year)	Medium (10 year)	Long (30 year)
High	9,340	18,460	54,700
High +20%	11,208	22,152	65,640
Medium (CCC most likely growth scenario)	6,100	11,800	31,060



- 4.2. Statistics New Zealand provide growth projections for the entire Territorial Authority area. For Christchurch, the geographical area includes urban Christchurch and the settlements and rural areas of the Banks Peninsula. For the purpose of the 2025 HCA, the whole of TA projections have been applied rather than limiting the focus to the Christchurch Urban area⁸. This approach was appropriate, as the majority of projected growth is concentrated within the urban area, making further refinement of the study area unnecessary.
- 4.3. The StatsNZ December 2021 household projections with a 20% competitiveness margin applied were used to estimate future housing demand. The projections use the 2018 base and projects growth in five yearly increments until 2078, with the closest alignment of 30 years growth to 2025 being the 2023-2028 projection out to 2053-2058.

⁸ The Christchurch Urban area is the area to the north of the Port Hills plus Lyttelton. Other than Lyttelton, the other settlements of the Lyttelton Harbour, those of the wider Banks Peninsula area and rural Banks Peninsula are not part of the Christchurch Urban Area. However, these areas are included in the Christchurch City Territorial Authority demand projection.

- 4.4. The extrapolation of the projections to 2078 is undertaken by Stats NZ through a customised data order prepared for Christchurch City Council (JOB-11790). “Any reasonable extrapolations necessary to reflect a 30-year period” are undertaken by StatsNZ in the customised data order; the Council has not undertaken any further extrapolation. As the HCA uses household projections from StatsNZ, there was no need to use household composition values to convert population to households. This approach is consistent with previous assessments of demand.
- 4.5. No further information or adjustments to estimate core housing demand is needed and none have been used. All HCAs undertaken to date assume a one household to one dwelling ratio due to demand from specific demographic sub-groups being numerically and proportionally insignificant⁹. Furthermore, similarly as for the 2018 and 2021 HCAs, the housing sufficiency surplus reported is considered to adequately address any unmet demand from any specific demographic sub-group. Particularly when the total feasibility count is compared to the StatsNZ recommended application of medium projections and considering additional capacity not accounted for – see paragraph 5.10 below.
- 4.6. The 2021 HCA did report that Christchurch City had a relative level of crowding with 9% of renter households crowded, but this was considered more an indicator of demand for housing typologies with larger bedroom numbers. Whilst the medium and high density residential rules do allow for larger houses to be built, those most commonly delivered (built) are 2-3 bedroom multi-units. This development outcome being consistently modelled as one of the most feasible outcomes in medium and high density areas. To reiterate, the high growth projection with a 20% margin is significantly higher than the [StatsNZ recommended medium growth projection](#) for Christchurch City¹⁰ and would adequately cater for any unmet demand. Furthermore, addressing market failures in terms of overcrowding are unlikely to be resolved through adding any additional margin to required housing capacity. There are factors other than the quantum of housing enablement, that contribute to the supply of multi-generational homes and renter accommodation.

5. Plan Enabled Capacity

Table 4: Plan Enabled Housing Capacity, Christchurch Urban Area		
Zone Group	Plan Enabled Capacity (gross)	Qualifying Matter present
Residential	387,000	
Commercial	12,600	
Mixed-Use	58,500	
Total	458,262	
		95,200

- 5.1. Plan-enabled housing capacity provides a high-level assessment of what is theoretically possible to build within the provisions of the District Plan. It is not an assessment of the maximum capacity potential (i.e. each site developed to its full potential as enabled under the District Plan), rather it is an assessment of the capacity that is probable when reasonable assumptions are made for housing density outcomes for each zone. Plan-enabled capacity is calculated (as for previous

⁹ 2021 Greater Christchurch Housing Capacity Assessment – refer to section 5

¹⁰[https://www.stats.govt.nz/methods/population-statistics-user-guide/#:~:text=Accuracy-,Overview,\(deaths\)%2C%20and%20migration.](https://www.stats.govt.nz/methods/population-statistics-user-guide/#:~:text=Accuracy-,Overview,(deaths)%2C%20and%20migration.)

HCA) by applying a household per hectare density assumption to urban zones that provide for residential activity (noting residential enablement is not limited to residential zones). The density assumptions for each zone shown in Table 5 are probable outcomes (yields) rather than maximum outcomes (i.e. the theoretical maximum the District Plan could enable). Maximums would be a significantly higher count.

Table 5: Plan-enabled density assumptions for District Plan zones	
Zone name	Density Assumption HH/Ha
High Density Residential	120
Medium Density Residential	80
Residential Medium Density	80
Residential Suburban Density Transition	60
Residential Suburban	15
Residential New Neighbourhood	15
Residential Hills	10
Residential Large Lot	7
Residential Small Settlement	10
Residential Banks Peninsula (Lyttelton only)	15
City Centre	200
Local Centre	80
Neighbourhood Centre	80
Town Centre	100
Central City Mixed Use (incl. South Frame)	200
Mixed Use	150

5.2. **Qualifying Matter Influence** - Table 6 shows the total (gross) capacity and the influence of Qualifying Matters (QM) being provided as a net total. The Total Capacity, net of QM influence, is calculated based on a deduction of capacity where there is a spatial overlap of the QM extent with the zone extent. Importantly, this is not a measure of lost capacity, it only indicates that for a portion of plan-enabled capacity, the density assumption may need adjustment to account for the influence of the QM. At a site level and for some QMs in general, the density assumption may be unaffected by the QM and would be determined through the resource consent process on a case-by-case basis. Further details of the influence of Qualifying Matters on capacity may be found in the updated 2025 HCA.

Table 6: Estimated Feasible Housing Capacity Minimum (range shown for with and without QM adjustment)	
Housing Capacity Assessment Source	Estimated Feasible Capacity
Residential zones: Medium density intensification	50,800
Greenfield remaining capacity	7,600
High density Residential Central City	4,500
Mixed-use apartment City Centre Zone	5,300
Total	68,200 (range: 68,200 to 78,400)

6. Commercially Feasible Capacity

- 6.1. The Council's in-house feasibility model is a spatial and financial model, based on the MfE/MBIE Development Feasibility Tool¹¹. Further detail on the modelling approach is provided within the 2025 and previous HCAs. The modelling approach has been peer reviewed by Sense Partners in 2023 and by Sense Partners (Kirden Lees) and David Dyason in 2025, both concluding that the modelling approach is reasonable, fit for purpose and adheres to the Ministry for the Environment's guidance on Housing and Business Capacity Assessments.
- 6.2. Redevelopment and infill of existing residential zoned sites is currently the largest potential source of housing capacity in Christchurch. Other sources of assessed capacity are in the Mixed Use zones and from ongoing development of operative zoned greenfield areas, some of which has been approved for subdivision. Modelling for feasible capacity considers all sites enabled (through zoning and provisions) for residential development. The Council's feasibility assessment has utilised both the in-house model and evidence led through the PC14 section 32 evaluation and hearing process (see Table 7 below). Estimated feasible capacity from these sources is set out in Table 5. Feasible capacity totals are shown net of potential QM influence (with the higher gross total provided as a range).

Table 6: Capacity assessment process/source of information	
Capacity assessed	Process/Source
Intensification: Redevelopment and infill of residential zones	Site feasible capacity modelling. Council intensification model.
Undeveloped Greenfield	Ongoing monitoring of greenfield areas for uptake/residual. Council monitoring of development activity.
High Density Residential Zone – Central City Residential Precinct	PC14 evidence site modelling (The Property Group) Extrapolation process.
City Centre Zone – mixed use typologies	PC14 evidence site modelling (The Property Group) Extrapolation process.
Qualifying Matters	PC14 Section 32 evaluation – Part 2

- 6.3. **Residential intensification** – Council's modelling for medium density intensification capacity has considered all sites in zones that provide for medium density or higher residential development outcomes. The standard for considering a development scenario for a site "feasible" is where the relationship between costs and revenue allow for a 20% profit margin and, for redevelopment, where the land value comprises at least 60% of the capital value. The model inputs (parameters) have been updated to reflect current costs and revenue expectations and reviewed against trends in development outcomes (specifically what the market is delivering in terms of different typologies and price points).
- 6.4. Updates to the model also account for changes to zone extents, built form rules and the influence of any Qualifying Matters (QMs) or other overlays. The influence of Qualifying Matters (QMs) has been spatially assessed at site level. Where the spatial overlap of a QM extent is found to be a

¹¹ <https://www.hud.govt.nz/our-work/national-policy-statement-on-urban-development>

significant influence on the potential for development of the site , that site has been excluded from the net total capacity. However again, the presence of a qualifying matter does not necessarily mean a loss in capacity. Further detail on each qualifying matter can be found in the Council’s evidence and s42A reports submitted to the PC14 Independent Hearings Panel¹².

- 6.5. **Undeveloped Greenfield** - Christchurch’s greenfield areas were assessed in 2018 as feasible, with ongoing monitoring¹³ tracking development progress. Remaining capacity has been re-estimated based on a minimum density yield of 15 hh/ha and was last evaluated in Nov-Dec 2024, which showed there was an estimated 8,300 remaining greenfield housing capacity. The current rolling average of uptake is at a rate of approximately 900 houses constructed per annum, meaning there may be some 7,600 households remaining in greenfield areas at mid-2025.
- 6.6. This assumes that only the minimum density requirement of 15 households per hectare is delivered. In reality, the rules¹⁴ that manage greenfield areas permit that 20% of developments can have lots down to 180m2. If delivered, then this would mean that the average density of developments would increase to 20hh/ha, demonstrating the conservativeness of figures presented.
- 6.7. High density residential development and Mixed-use Apartments - Development potential for high density housing and mixed-use typologies was assessed for PC14¹⁵ using a sample site approach, quantity surveying costings, and market assessment. High density apartment testing was limited to the Central City Residential Precinct, to align with areas where building height is enabled to a degree sufficient to be commercially viable¹⁶. Mixed use typologies were only evaluated within the City Centre zone, being the limitations of where PC14 evidence of commercial viability was focused. To estimate the potential of feasible high density development more widely, the results of the high density and mixed-use modelling have been extrapolated to sites that share the characteristics of the sample testing sites. Further detail on the methodology (testing and results) is provided in the 2025 HCA.
- 6.8. **Additional housing capacity uncounted** - Housing capacity also exists outside of the categories that we have used in the capacity assessments. We excluded them from the overall count for various reasons (see Table 7 below). Some may result in additional (uncounted) capacity, either from spatial areas not being included, or by increasing the density of development outcomes. This is noted again to reinforce the significant level of capacity that is enabled under the operative District Plan.

Table 7: Sources of housing capacity not assessed	
Source of potential capacity	Reason(s) for not assessing/including
Medium density development outcome achieving profit margins between 15% and <20%	These outcomes are close to but do not meet the minimum 20% profit expectation.

¹² <https://chch2023.ihp.govt.nz/evidence>

¹³ [Built environment reporting : Christchurch City Council](#)

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¹⁵ <https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/13-Ruth-Allen-Statement-of-evidence-final.PDF>

¹⁶ High density feasibility evidence from PC14 (page 34 of PDF): [13-Ruth-Allen-Statement-of-evidence-final.PDF](#)

Banks Peninsula Residential Zones (other than Lyttelton)	Outside of the Christchurch Urban Area.
Social housing and community housing, other alternative non-profit models (e.g. co-housing)	Not-for-profit non-commercial development falls outside the scope of the assessment.
Homeowner led subdivision and minor dwelling units not intended for sale or where there is not a same profit motive.	Non-commercial developer/development or where there is a reduced profit expectation
Brownfield developments ¹⁷	Generally larger sites that require site specific qualitative assessment to address likely site-specific matters (e.g. land remediation). This includes large residential zoned sites that have had a historic commercial use.
City Centre zone, higher height typologies (above 19 storeys)	Outside of model capability and not addressed through PC14 evidence.
Alternative zone yield within school and hospital zones	Require site specific qualitative assessment and timing is uncertain (sites where activity has already ceased are considered brownfield sites).
Site amalgamation – land assembly potential to increase overall yield. Medium density zone outcomes.	Uncertainty around identification of amalgamation opportunities and estimating additional process and holding costs.
Higher density greenfield scenarios (above the minimum 15 hh/ha)	Uptake of this potential and a feasible assessment is outside the current scope of the model. Greenfield housing yield can be up to 40 hh/ha across 20% of the total area, yielding 20 hh/ha average. While these density outcomes are observed, it is difficult to predict this outcome for the future with certainty.
Future potential greenfield areas - Private Plan Change areas ¹⁸	If made operative, will require site specific quantitative and qualitative land assessment and building feasibility assessment to confirm implied feasibility.

7. Summary of Housing Capacity

- 7.1 Council is confident that the Operative Christchurch District Plan meets the “key requirement” for the Minister to approve the Council withdrawing PC14. Christchurch is well positioned to continue to provide housing across the spectrum of housing demand, including a significant proportion met through medium or higher density development.

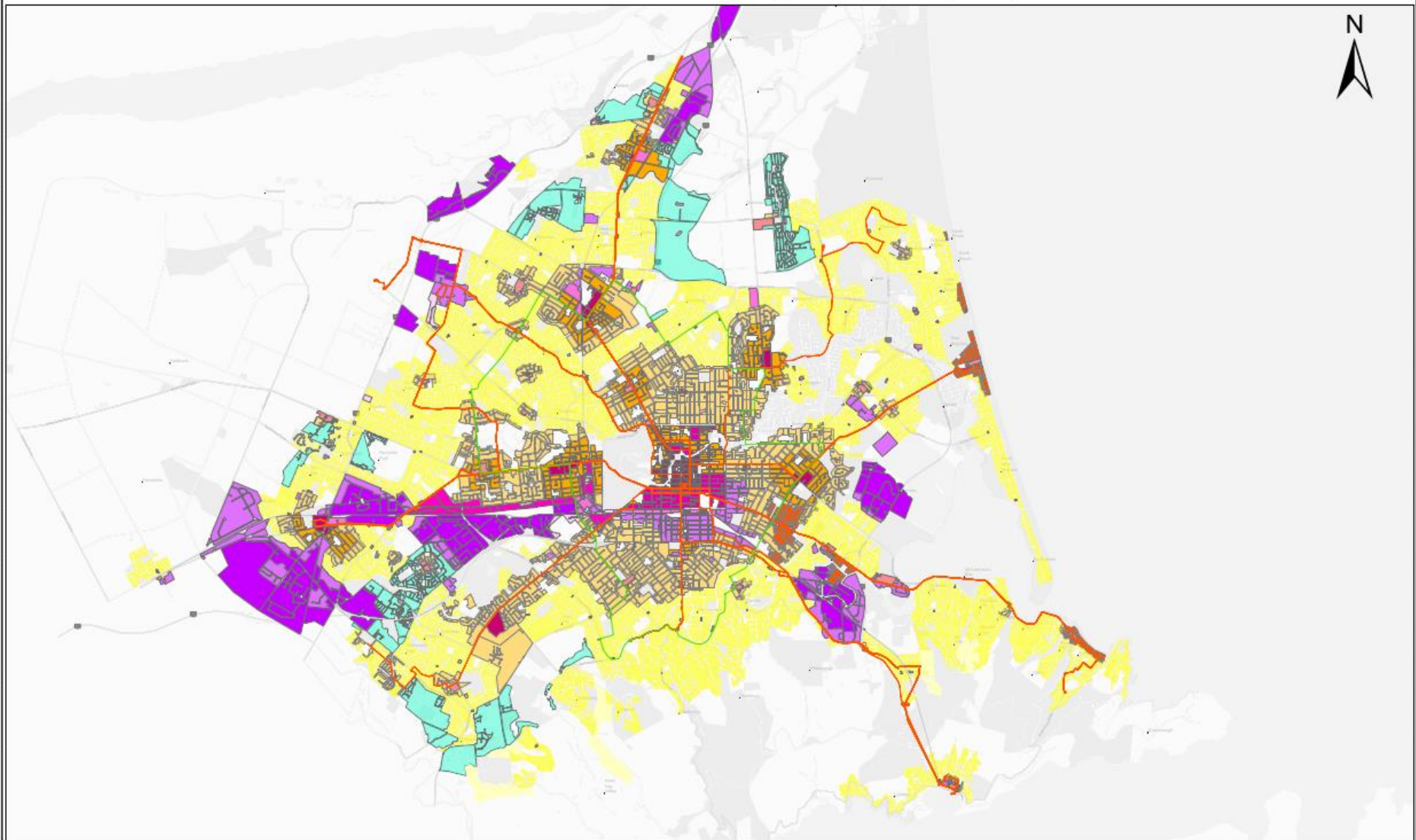
¹⁷ The 2025 updated HCA contains details of estimated yield (untested) from example brownfield sites.

¹⁸ [Private plan changes : Christchurch City Council](#)

Attachment A: Summary and illustration of zoning and overlays enabled by PC14 Council decisions

Table 1: Summary of zoning and overlays enabled by PC14			
Zone / overlay	Applicability	Permitted building height, bulk, units, and density	Unit non-compliance activity status and relevant matters
Medium Density Residential Zone (MRZ)	Surrounding all HRZ, larger local centres, select transport corridors, and most previously zoned medium density areas.	11m+1m (MDRS); 50% coverage; 3 units per site; Zero density limit.	Restricted Discretionary: 14A.5.1.3 – RD1. One matter of discretion: Rule 14A.11.1 Residential Design Principles.
Local Centre Intensification Precinct (LCIP)	Over MRZ, surrounding key Local Centre zones.	12m. Remaining controls as per MRZ, but applies a recession plane exemption along front of sites for 3+ unit developments.	As per MRZ. Restricted Discretionary for recession plane breach. One matter of discretion: Rule 14A.11.4 Height in relation to boundary.
High Density Residential Zone (HRZ)	Surrounding City Centre Zone, Town Centre Zone and larger Local Centre Zone commercial areas.	14m or 22m within Central City. 50% coverage, or 60% when conditions met. 3 units per site Zero density limit.	Restricted Discretionary: 14A.6.1.3 – RD2. One matter of discretion: Rule 14A.11.1 Residential Design Principles.
Central City Residential Precinct	Only surrounding City Centre Zone.	39m. Remaining controls as per HRZ.	As per HRZ. Restricted discretionary for building height breach (14A.6.1.3 RD9). One matter of discretion: 14A.11.3 (a., and b.vii. A and B only) Impacts on neighbouring property and planned urban built character.
Urban Intensification Area	Across all residential zones decided via PC14.	N/A	N/A. This delineates where PC14 has been decided to identify which of the residential chapter rules have been modified by PC14.
Residential Overlays	Across all residential zones decided via PC14.	Applies controls as per previously operative residential zones through the Residential Pathways approach. MRZ or HRZ rules cannot be used when in effect.	As per Chapter 14B, being residential chapter rules applicable prior to PC14.

Christchurch Urban Environment – District Plan Zones (with high frequency bus routes)



Scale: 1:30,000
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- | | |
|---|---|
| Pre-PC14 medium density zones (QM influenced) | Various Pre-PC14 suburban zones <15 hh/ha |
| Medium Density Residential zone | Pre-PC14 Residential New Neighbourhood zone [greenfield zone] |
| High Density Residential zone | Town Centre zone |
| City Centre zone | Local Centre zone |
| Central City Mixed Use zone | Neighbourhood Centre zone |

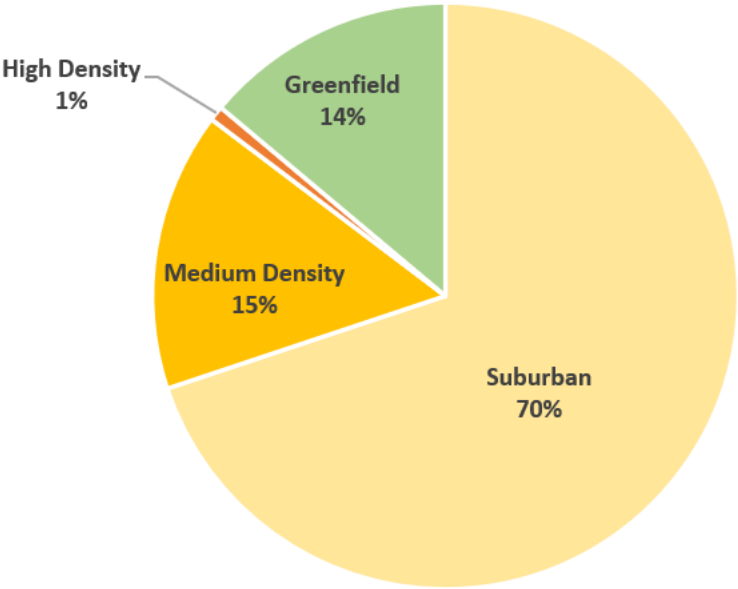
Please note:
This legend details core zoning to describe zones relevant to the PC14 intensification response. In most cases, National Planning Standard symbology has been utilised for zones not otherwise described here.

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Attachment B: PC14 representation of proportional change to urban rezonings pre and post PC14 Council decisions

2023 Pre-PC14 Residential Zoning



2025 Residential Zoning

