



PROACTIVE RELEASE COVERSHEET

Minister	Hon Chris Bishop	Portfolio	RMA Reform
Name of package	BRF-7019 HUD2025-007800 Christchurch City Council request to withdraw plan change 14	Date to be published	02 October 2026

List of documents that have been proactively released

Date	Title	Author
6 November 2025	BRF-7019 HUD2025-007800 Christchurch City Council request to withdraw plan change 14	Ministry for the Environment and Ministry of Housing and Urban Development
10 November 2025	Signed letter from Minister Bishop to Christchurch City Council regarding withdrawal of Plan Change 14	Hon Chris Bishop, Minister Responsible for RMA Reform

Information redacted **YES**

Any information redacted in this document is redacted in accordance with the Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

Summary of reasons for redaction

Some information has been withheld under Section 9(2)(a) of the Official Information Act 1982 to protect the privacy of natural persons, including that of deceased natural persons.

Some information has been withheld under Section 9(2)(h) of the Official Information Act 1982 for the reason of maintaining legal professional privilege.



JOINT BRIEFING

CHRISTCHURCH CITY COUNCIL REQUEST TO WITHDRAW PLAN CHANGE 14

Date:	6 November 2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRF-7019 HUD2025-007800

	Action sought	Response by
Hon Chris Bishop Minister Responsible for RMA Reform	Read and sign the briefing.	21 November 2025
Hon Chris Bishop Minister of Housing	Copy for your information	N/A

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Stephanie Gard'ner	Manager, Urban Policy, Ministry for the Environment	S 9(2)(a)	✓
Fiona McCarthy	Manager, Land Use and Land Markets, Ministry of Housing and Urban Development	S 9(2)(a)	
Craig Fredrickson	Senior Advisor – Policy, Urban Policy, Ministry for the Environment		
Peter Owen	Senior Policy Advisor, Land use and Land Markets, Ministry of Housing and Urban Development		

The following departments/agencies have been consulted
N/A

Minister's office to complete:

- | | | |
|--|---|------------------------------------|
| ☐ Noted | ☐ Approved | ☐ Declined |
| ☐ Overtaken by Events | ☐ Needs change | ☐ Seen |
| | ☐ See Minister's Notes | ☐ Withdrawn |

Minister's Comments

JOINT BRIEFING

CHRISTCHURCH CITY COUNCIL REQUEST TO WITHDRAW PLAN CHANGE 14

Date:	6 November 2025	Priority:	Medium
Security classification:	In Confidence	Tracking number:	BRF-7019 HUD2025-007800

Purpose

1. To provide you advice to support your decision on whether to accept Christchurch City Council's (the Council's) request to approve the withdrawal of Plan Change 14 (PC14), under Clause 11 of Schedule 3C of the Resource Management Act 1991 (RMA).

Key points

- On 14 October 2025, the Council requested your approval to withdraw PC14, under Clause 11 of Schedule 3C of the RMA (Appendix 1).
- Under the RMA, you may approve the Council's request if you are satisfied the operative Christchurch District Plan meets the key legislative requirement. If you are not satisfied, you may decline the Council's request.
- Appendix 2 sets out the statutory test and Appendix 3 lists the evidence provided by the Council in support of its request, along with our analysis of that evidence.
- Officials have assessed the Council's evidence and are satisfied that the key requirement has been met.
- If you are satisfied the key requirement has been met and choose to approve the withdrawal, you must notify the Council in writing. A draft approval letter is provided in Appendix 4.
- If you are not satisfied, you may decline the request and must notify the Council in writing providing your reasons. Should you wish to take this approach, we recommend discussing this further with officials.
- To support the Council in completing its Intensification Planning Instrument (IPI) by 12 December 2025, we ask that you send the letter no later than 21 November 2025.

Recommended action

1. We recommend you:
2. **Note** that clause 11 of Schedule 3C of the Resource Management Act 1991 sets the key requirement that you must be satisfied is met before approving Christchurch City Council's request to withdraw Plan Change 14. *Noted*
3. **Note** that officials consider that the evidence provided by Christchurch City Council as part of its written request to withdraw Plan Change 14 is in accordance with clause 11(1) and 11(4) of the Resource Management Act 1991 and satisfies the key requirement set out in clause 11(3) of Schedule 3C of the Resource Management Act 1991 *Noted*
4. **Note** that per clause 11(5) of Schedule 3C of the Resource Management Act 1991, if you are satisfied that the key requirement has been met you may approve Christchurch City Council's request, and notify the Council in writing. *Noted*
5. **Note** that per clause 11(6) of Schedule 3C of the Resource Management Act 1991, you may decline Christchurch City Council's request if you are not satisfied the key requirement has been met and notify it in writing providing your reasons. If this is your preferred approach, we ask that you discuss this further with officials. *Noted*
6. **Agree** you are satisfied that that the operative Christchurch District Plan meets the key requirement set out in Clause 11(3) of Schedule 3C of the Resource Management Act 1991, and that you approve the request to withdraw Plan Change 14 under Clause 11(2) of Schedule 3C of the Resource Management Act 1991. *Agree / Disagree*
7. **Agree** to notify Christchurch City Council in writing of your approval, as set out in clause 11(5) of Schedule 3C of the Resource Management Act 1991. *Agree / Disagree*

8. **Note** that we ask that you send written approval no later than 21 November 2025 to support the Council to complete its Intensification Planning Instrument by 12 December 2025.

Noted

Stephanie Gard'ner
Manager, Urban Policy
Ministry for the Environment

05/11/2025

Hon Chris Bishop
**Minister Responsible for
RMA Reform**

___ / ___ / 2025

Fiona McCarthy
Manager, Land Use and Land Markets
Ministry of Housing and Urban Development

05/11/2025

Background

1. Christchurch City Council (the Council) publicly notified its Intensification Planning Instrument (called Plan Change 14 (PC14)) on 19 March 2023. This plan change implements the National Policy Statement on Urban Development 2020 (NPS-UD) and the medium density residential standards (MDRS).
2. An Independent Hearings Panel (IHP) heard submissions and made recommendations on PC14 to the Council to enable greater intensification across the city on 29 July 2024. Over the past year, the Council has been deciding on the IHPs recommendations and making these decisions operative.¹
3. The Council has completed the parts of PC14 that implement the NPS-UD. The Council has not completed the parts of PC14 that would implement the MDRS in areas further from the city centre.
4. The Council is required to complete PC14 by 12 December 2025 (New Zealand Gazette Notice: 2024-sl4625).
5. The Resource Management (Consenting and Other System Changes) Amendment Act 2025 amended the Resource Management Act 1991 (RMA) to enable the Council to ask for your approval to withdraw all PC14 on the basis that it met housing capacity requirements.
6. On 14 October 2025, the Council requested you approve the withdrawal of the parts of PC14 that are not complete and provided evidence to support its request.

Requirement to withdraw Plan Change 14

7. Under Clause 11 of Schedule 3C of the RMA (Appendix 2), you may approve the Council's request to withdraw PC14 if you are satisfied that the operative Christchurch District Plan meets the key requirement – that it has enough feasible housing capacity to meet 30 years of adjusted demand. This requirement was designed to align with Going for Housing Growth policy decisions for housing growth targets.
8. Thirty years of adjusted demand means the most recent high-growth household projections for Christchurch City territorial area, published by Statistics New Zealand and extrapolated to reflect a 30-year period, with an additional 20 per cent margin added (Schedule 3C, clause 7).
9. Feasible means commercially viable for a developer based on the current relationship between costs and revenue, with any reasonable adjustments made for the longer term – between 10 and 30 years (Schedule 3C, clause 11(7)).

¹ Where the Council disagreed with the IHPs recommendations, it referred those to you to decide on and following your decisions made these parts of PC14 operative. There are three recommendations with you for final decisions, but these are not relevant to the decisions sought in this paper. The Ministry for the Environment will provide you with advice on these recommendations later in November.

10. As part of its request, the Council is required to provide evidence to demonstrate that the operative Christchurch District Plan satisfies the key requirement. The Ministry for the Environment and the Ministry of Housing and Urban Development worked with the Council to develop a list of evidence that would enable officials to assess whether the key requirement has been met. This included information on demand projections, and the methodology used for calculating plan-enabled and feasible capacity, including key assumptions underpinning those calculations. This list is included in Appendix 3.
11. S 9(2)(h) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

The Council has met the criteria to withdraw PC14

12. As required by the RMA, the Council provided evidence to support its request. We believe that the evidence provided demonstrates that the key requirement of the RMA has been met.
13. Officials reviewed the material, which included data, modelling assumptions, modelling methodology and other inputs, checking their source, validity, and appropriateness for use. This also included assumptions used to calculate feasibility, including land prices, building construction costs, dwelling sales prices, and developer profitability.
14. A detailed list of the evidence provided by the Council is included in Appendix 3, along with our assessment of the material and how this contributes to the Council satisfying the RMA's key requirement.
15. The modelling and reporting of the evidence undertaken by the Council is consistent with the approach set out in the guidance on Housing and Business Development Capacity Assessments (HBAs) published to support the implementation of the NPS-UD, and matches the methods used previously by the Council. We consider the evidence provided is sufficient to support your decision.
16. The evidence provided shows that:
- a. the 30 years of adjusted demand² for dwellings in Christchurch City was calculated to be **65,640 dwellings**.
 - b. plan enabled capacity was calculated as being 458,000 dwellings.
 - c. the feasible housing capacity for Christchurch City was calculated as being at least **68,200 dwellings**.
 - d. therefore, the operative Christchurch District Plan provides feasible housing capacity 2560 dwellings in excess of the 30-year adjusted demand.

² The 30-year demand projection was undertaken for the Christchurch territorial authority area, using custom 'high' household population projections (2021 base) supplied by Stats NZ. The calculation also included the required additional 20 percent.

17. To support its evidence, the Council also provided two statements of peer review:
 - a. Kirdan Lees of Sense Partners reviewed the underlying modelling of plan-enabled and feasible capacity in September 2023, and
 - b. David Dyason of Urbannomics peer reviewed the report provided to us as evidence on how the modelling was undertaken.

Remaining referred recommendations – Daresbury, Antonio Hall and Piko Crescent

18. There are three recommendations on PC14 the Council has referred to you for decisions. These relate to two heritage sites, Antonio Hall and Daresbury, and a special character area around Piko Crescent.
19. The Council is not relying on additional capacity provided by these sites to satisfy the key requirement to withdraw PC14. The Council has also completed its part in these recommendations so the timing of your decisions on these sites will not prevent the Council from completing PC14 by the deadline of 12 December 2025.
20. If you accept the Council's application to withdraw PC14, it will still be up to the Council to decide exactly the parts of PC14 to withdraw³. MfE understand from council staff that the Council does not intend to withdraw the recommendations on Daresbury, Antonio Hall and Piko Crescent. Therefore, you are likely to still need to decide on these sites.
21. Ministry for the Environment officials will provide you with advice on these referred recommendations in late November 2025 which will include a proposed approach for the two heritage sites.

Withdrawing the MDRS from parts of Christchurch is unlikely to impact development rights

22. When the Council notified PC14, it applied a city-wide qualifying matter relating to sunlight access. This meant the MDRS never had immediate legal effect and, unlike in Auckland, people could not rely on the permitted activity rules in the MDRS to progress development.
23. Officials have spoken with staff from the Council and understand that they are not anticipating issues as a result of withdrawing PC14.

Next steps

24. If you approve the Council's request to withdraw PC14, you must notify the Council in writing. A draft letter approving the withdrawal of PC14 is attached as Appendix 4. We ask that you send written approval no later than 21 November 2025 to ensure that the Council can complete its IPI by 12 December 2025.

³ Clause 12 Schedule 3C of the RMA.

25. From the date of your approval, if granted, the Council may withdraw all or part of PC14 and it may withdraw different parts of PC14 at different times. The Council must give public notice of any withdrawal, including the reasons for the withdrawal.⁴
26. If you are not satisfied the key requirement has been met, you may decline the Council's request and notify it in writing providing your reasons. If this is your preferred approach, we ask that you discuss this further with officials.

Appendices

Appendix 1: Written request from Christchurch City Council to withdraw Plan Change 14

Appendix 2: Statutory requirements for withdrawal of Plan Change 14 (from the Resource Management Act 1991)

Appendix 3: List of agreed evidence supplied by Christchurch City Council, including officials' assessment of evidence in contributing to showing how the key requirement has been met

Appendix 4: Draft letter to Christchurch City Council

⁴ If you approve withdrawal of PC14, next steps for the Council are set out in Clauses 12 to 15 of Schedule 3C RMA.

Appendix 1: Written request from Christchurch City Council to withdraw Plan Change 14

14 October 2025

03 941 8999

53 Hereford Street
Christchurch 8013

PO Box 73016
Christchurch 8154

ccc.govt.nz

Hon Chris Bishop
Minister responsible for RMA Reform
PO Box 18041
Parliament Buildings
Wellington 6160

Tēna koe Minister

Request to approve the withdrawal of Plan Change 14

We are writing to request you to approve the withdrawal of the balance of Plan Change 14 (PC14) under clause 11 of Schedule 3C of the Resource Management Act.

Council has completed decision making on the recommendations of the Independent Hearings Panel on PC14 to the extent necessary for the operative District Plan to meet the “key requirement” in the Act for you to approve withdrawal of the balance of PC14.

The operative District Plan provision for intensification across Christchurch is focused within and around commercial centres and key public transport routes. 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.

This application provides evidence to demonstrate that the operative Christchurch District Plan satisfies the key requirement (as required by clause 11(4)(a) of Schedule 3C of the Act). Conservative, cogent peer-reviewed modelling shows that the operative District Plan provides a feasible housing capacity of 68,200hh to meet 30 years of adjusted demand. The key requirement is 65,640hh. The key requirement is comfortably exceeded.

That evidence demonstrating that the operative Christchurch District Plan meets the “key requirement” is in three documents appended to this letter; first, a summary of housing demand and supply; secondly, an overview of how the requirements of the Act are met; and thirdly, a more detailed and updated Housing Capacity Assessment.

Subject to your approval, Council will decide on withdrawing all undecided parts of PC14 prior to your 12 December 2025 deadline for the Council to conclude its decision making on PC14. Should there be any questions or clarifications on the documents provided we remain available to assist you and Ministry staff.

Yours sincerely,



Mark Stevenson

Head of Planning & Consents
Christchurch City Council

Appendix 2: Statutory requirements for withdrawal of Plan Change 14 (from the Resource Management Act 1991)

Resource Management Act 1991

Schedule 3C: Alternative intensification provisions for Auckland and Christchurch

Part 2: Process for Christchurch City Council to withdraw Plan Change 14

11 Minister may approve withdrawal of Plan Change 14

- (1) Christchurch City Council may request the Minister to approve the withdrawal of Plan Change 14.
- (2) The Minister may approve a request to withdraw if satisfied that the operative Christchurch district plan meets the key requirement.
- (3) The **key requirement** is that the Christchurch district plan has enough feasible housing capacity to meet 30 years of adjusted demand.
- (4) A request for approval to withdraw—
 - (a) must provide evidence to demonstrate that the operative Christchurch district plan satisfies the key requirement; but
 - (b) is not required to specify whether Christchurch City Council intends to withdraw all or only part of Plan Change 14.
- (5) If the Minister approves a request, the Minister must notify Christchurch City Council in writing.
- (6) If the Minister declines a request, the Minister must notify Christchurch City Council in writing and give reasons.
- (7) In this clause,—

30 years of adjusted demand means—

- (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)

feasible means,—

- (c) for the short and medium term, commercially viable for a developer based on the current relationship between costs and revenue; and
- (d) for the long term, commercially viable for a developer based on the current relationship between costs and revenue or on any reasonable adjustment to that relationship

long term means between 10 and 30 years

short and medium term means within the next 10 years.



Appendix 3: Evidence supplied by Christchurch City Council, including officials' assessment of it

The below table lists the evidence agreed by Council staff and MfE and HUD officials to be provided by the Council to support their application to seek your approval to withdraw PC14.

The table also notes whether the evidence was supplied, a brief summary of what was provided and officials assessment of the sufficiency of evidence provided to help illustrate whether the key requirement of the Resource Management Act 1991 (the Act) has been met.

Agreed evidence	Supplied	Brief summary of evidence	Sufficiency of evidence provided
DEMAND			
The Council's overall calculation of the 30-year demand projection (including additional 20%) for the Christchurch district	Yes	Overall demand for the 30-year period as required by the RMA is clearly stated and illustrated. Base demand is measured using StatsNZ custom household projections, 2021 base. The 30 years of adjusted demand for dwellings in Christchurch City was calculated to be 65,640 dwellings.	Note that the projections are in five-year increments from 2021. the Council has used the closet years to 2025 (2028) and 2055 (2058) We consider the evidence provided is sound.
Graph of growth projections for a 30-year period	Yes	Graph of demand shows medium, high, and high plus additional 20%.	We consider the evidence provided is sound.
Description of the geographic area that has been used to derive the 30-year demand figure for the Council	Yes	Projections are for the entire the Council territorial authority area, including non-urban areas.	The Council notes that because the majority of projected household growth is concentrated within the urban area, excluding the remainder was unnecessary. We consider the evidence provided is sound.
Confirmation that the assessment covers the 30-year period	Yes	Clearly shows the growth projections for the 30-year period.	We consider the evidence provided is sound.
Confirmation that the assessment is based on high-growth StatsNZ projections	Yes	Clearly states that high projection is used and is shown.	We consider the evidence provided is sound.
Description of the method for extrapolating the data to reflect the 30-year period	Yes	Notes that StatsNZ has extrapolated its existing projections for the Council through to 2078. Council has used these with no further adjustments.	We consider the evidence provided is sound.

Agreed evidence	Supplied	Brief summary of evidence	Sufficiency of evidence provided
Confirmation that the calculation includes an additional 20% on top of the 30-year demand estimate	Yes	Clearly shows the growth projections for 5, 10 and 30 years with and without the 20% added.	We consider the evidence provided is sound.
Information on any dwelling to household ratio used in the core demand projection, including any changes from previous Housing and Business Development Capacity Assessments (HBAs).	Yes	Notes that no ratio is needed, as StatsNZ projections are for households, and that the Council assumes a one household to one dwelling ratio due to demand from specific demographic sub-groups being numerically and proportionally insignificant.	We consider the evidence provided is sound.
PLAN ENABLED CAPACITY			
The Council's overall calculation of the plan-enabled capacity	Yes	Clearly shows the amount of plan enabled dwelling capacity by type of zone. Plan enabled capacity was calculated as 458,000 dwellings.	We consider the evidence provided is sound.
High level summary of how plan-enabled capacity is calculated, including:	Yes	Documentation outlines how feasible capacity was modelled.	Because of the nature of the way the Council has modelled feasible capacity, its explanations on this and plan-enabled capacity run together. We consider the evidence provided is sound.
Summary of which rules, standards, spatial layers etc are incorporated into assessment of plan-enabled capacity	Yes	Provided list of the zones and overlays used in the modelling.	We consider the evidence provided is sound.
Any changes to methodologies for calculating plan-enabled capacity since last HBA and rationale for any changes	Yes	No major changes made to method since 2023 modelling.	We consider the evidence provided is sound.
Information of what qualifying matters have been applied, and how these have been factored into the assessment of what is plan-enabled.	Yes	Detailed explanation provided on the qualifying matters considered, and how they were addressed in the plan-enabled capacity totals.	Approach to quantify impacts of qualifying matters is acceptable. Provides summary of impact on dwelling yields by qualifying matter. We consider the evidence provided is sound.
FEASIBLE CAPACITY			
The Council's overall calculation of the plan-enabled and feasible capacity	Yes	Clearly shows the amount of feasible dwelling capacity by type of zone. Feasible capacity was calculated as 68,200 dwellings	We consider the evidence provided is sound.

Agreed evidence	Supplied	Brief summary of evidence	Sufficiency of evidence provided
High-level summary of how feasibility is calculated (incl. items below)	Yes	Document outlines how feasible capacity was modelled. Also notes that it is based on the MfE/MBIE NPS-UD Development Feasibility Tool.	Because of the nature of the way the Council has modelled feasible capacity, its explanations on this and plan-enabled capacity run together. We consider the evidence provided is sound.
Information on nature of inputs used for costs and revenue, sources, and currency	Yes	Notes that base assumptions have been updated to reflect current market conditions (e.g. building costs and sale prices). List of sources for this information included. Input cost assumptions provided. Details on inputs in the feasible capacity modelling were provided in spreadsheet.	In the period since the 2023 HBA, building costs have continued to rise while sales prices have shown less movement. Consequently, the balance of costs and revenue has changed. We consider the evidence provided is sound.
Any adjustments that have been made to costs or prices for long term demand	Yes	No adjustments made, as the feasibility modelling is a point-in-time assessment based on assumptions for what may be built on a commercial bases for profitable sale.	Consistent with NPS-UD guidance. We consider the evidence provided is sound.
Profitability assumptions used in the model	Yes	A 20% developer profit margin was used to calculate feasibility. A 15% profit margin was also tested, with results included, noting that this may be an acceptable level of risk for some developers. Results are included but not used in totals presented.	Use of 20% margin matches that used in previous capacity assessments. We consider the evidence provided is sound.
OTHER			
Zoning maps, focusing on where PC14 has been made operative	Yes	Map provided showing extent of the operative district plan zones.	Maps are available online, which provide the necessary detail of areas of change.
Any statement of peer review, alongside information about any changes made in response to the peer review	Yes	Two peer reviews supplied: David Dyason reviewed this modelling and report. Kirdan Lees at Sense Partners previously reviewed the previous modelling approach on which this is based.	Both reviews state that they believe the approaches taken and the assumptions used by the Council in the approach used in calculating capacity are appropriate and in line with the NPS-UD guidelines.

Appendix 4: Draft letter to Christchurch City Council

Date

Mark Stevenson
Head of Planning & Consents
Christchurch City Council
53 Hereford Street
Christchurch 8013

Tēnā koe Mark

Thank you for your letter dated 14 October 2025 requesting approval for Christchurch City Council to withdraw Plan Change 14 under clause 11 of Schedule 3C of the Resource Management Act 1991 (the Act).

I have reviewed your request and the attached evidence of your compliance with the key requirement under the Act that the Christchurch operative district plan has enough feasible housing capacity to meet 30 years of adjusted demand.

I am satisfied that the key requirement has been met, and I therefore approve your request to withdraw Plan Change 14.

Thank you to you and your staff for working with me and my officials on this matter.

Yours sincerely,

Hon Chris Bishop
Minister Responsible for RMA Reform

Hon Chris Bishop

Minister of Housing
Minister for Infrastructure
Minister Responsible for RMA Reform
Minister of Transport
Leader of the House
Associate Minister of Finance
Associate Minister for Sport and Recreation



10 November 2025

CB-COR2233

Mark Stevenson
Head of Planning & Consents
Christchurch City Council
By email: S 9(2)(a)

Dear Mark

Thank you for your letter dated 14 October 2025 requesting approval for Christchurch City Council to withdraw Plan Change 14 under clause 11 of Schedule 3C of the Resource Management Act 1991 (the Act).

I have reviewed your request and the attached evidence of your compliance with the key requirement under the Act that the Christchurch operative district plan has enough feasible housing capacity to meet 30 years of adjusted demand.

I am satisfied that the key requirement has been met, and I therefore approve your request to withdraw Plan Change 14.

Thank you to you and your staff for working with me and my officials on this matter.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Bishop'.

Hon Chris Bishop
Minister Responsible for RMA Reform