Statement in Support of Paragraph 10 of the Summary Statement of Ms. Stacey Andrews

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Dated 1 September 2025

Infill Housing Supply: PC I's Alignment with RPS Provisions

RPS sets housing bottom-line for short-medium term and long term, based on the latest HBA.

Infill development is one component of the housing supply strategy in the FDS. However, the RPS does not set a specific bottom line for infill housing supply. Furthermore, PC I applies to only around 35% of the residential zone and therefore does not address the full infill capacity of the Medium Density Residential Zone.

Horizons' submission point 1 sought clarification on the comparatively low estimated housing supply expectation of PC I.

In her s42A report, Ms. Andrews acknowledged the limitations of the modelling methods used for both PC I and the HBA:

> Paragraph 24:
> "*The comparative assessment of the methodologies used to determine development capacity in the PC:I and the HBA clearly indicates the limitations associated with both methods. I acknowledge that there are definite improvements that should be adopted for the following HBA and, it follows, for future plan change processes. I am addressing these limitations in the next version of the HBA modelling.*"
>
> Paragraph 25:
> "*In my opinion, the method for assessing 'feasible and reasonably likely to be realised development' capacity within PC:I is highly conservative and is likely to understate actual development capacity. It is my opinion that the assumptions and approach applied within the HBA result in a more robust*

indication of 'feasible and reasonably likely to be realised' development capacity for infill housing across the city over the 30 years to 2053."

Ms. Andrews further noted in paragraph 35 that PC I may in fact exceed the estimated housing supply:

> Paragraph 35:
> *"Based on the reconsideration of assumptions explained in Table 2 and the updated PC:I and HBA theoretical capacity and 'feasible and reasonably likely to be realised' capacity results in Table 4, I estimate that residential intensification within the MRZ could supply between 2,286 and 2,816 dwellings to meet the demand for infill housing, assuming an average lot size of 150m^2 – this equates to up to 66% of the demand. Should the average lot size per dwelling reduce to 100m^2, I estimate residential intensification in the MRZ could supply between 2,575 and 3,173 dwellings, representing up to 75% of the identified demand."*

In this context, I consider that PC I is consistent with the provisions of the Urban Form and Development chapter of the RPS.

Aruna Wickramasinghe
For Horizons Regional Council

1 September 2025