

**TO** Canterbury Regional Council  
P O Box 345  
CHRISTCHURCH 8140

**FROM** **Avoca Valley Ltd**  
PO Box 6724  
Upper Riccarton  
Christchurch 8442

*Note. see different address for service below.*

## **COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW (LURP)**

### **BACKGROUND**

#### LURP Submission and Summary

Avoca Valley Ltd submitted on the LURP in 2013 and sought for the Canterbury Earthquake Recovery Authority to consider this land for inclusion within the “Boundary of infrastructure supported priority, existing urban and greenfield areas”, and classify the land as a “Priority Residential Area Not Yet Zoned” in the proposed Land Use Recovery Plan (LURP). The basis for this request was as follows:

- The land is directly adjoining an existing residential area, which will ensure the site is well integrated with the surrounding pattern of development;
- The site is unique in the sense that it is zoned rural, but the horticultural production on the site is reliant on an artificial environment, as the soil has largely been removed from the site. Further it adjoins the Mary Duncan Reserve.
- Also, while the land is zoned rural, it already appears to be part of the urban environment, and more closely resembles the industrial area to the north of the State Highway than it does the rural environment to the south;
- The site will provide the opportunity to offset the loss of residential properties within Avoca Valley (which occurred as a result of land being red zoned because of rockfall risk after the earthquakes), and the wider area. A large proportion of red zoned land is located in the eastern part of the city, and there are few opportunities for new residential developments in these areas which could provide for displaced residents;
- The site will make use of capacity in servicing as a result of the red zoned properties in the Avoca Valley;
- The land has been investigated, and is considered geotechnically suitable for residential development, with a Technical Category 2 (TC2) classification;
- Preliminary advice from an environmental consultant indicates that while the current land use may have resulted in minor contamination of the land, it can be remediated to be suitable for residential development.

However the amendments sought as part of this original submission were not adopted as part of the LURP. The suitability of the land and outline of the preliminary investigations that were undertaken were discussed in detail within the original submission contained in **Appendix 1** of that submission.

## **STATUTORY CONTEXT**

Part of the LURP is a requirement that it be monitored and reviewed. This review was originally anticipated to take place on April 2015 however it was extended to the 30<sup>th</sup> of September 2015 to allow for a more informed view, based on available data. Further by September 2015 there will be more clarity around the transitional provisions in relation to the CER Act 2011.

Section 5.4 of the LURP states that: “In undertaking the review Environment Canterbury must obtain the views of greater Christchurch communities generally. Environment Canterbury can determine the exact nature and timing of how it consults with its communities”.

On this basis Environment Canterbury is seeking comment from the community and stakeholders on the effectiveness of the URP, the implementation of the 50 Actions contained within it, as part of the LURP review.

## **COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW**

On the basis of the original submission and the reasons outlined Avoca Valley Limited seek amendments to the LURP as detailed below to facilitate minor amendments to the Urban boundary so that the site can be considered for inclusion within the urban limits in the future

We hereby make the following comments with regard to the LURP review:

1. We seek an additional action point that requires Environment Canterbury to change Chapter 6 of the Regional Policy Statement to allow the District Council to make minor amendments to the Urban Limit boundary.
2. We seek an action point that requires Environment Canterbury to change chapter 6 of the Regional Policy Statement to include site within the Urban Limit boundary.

## **Concluding Comment**

Thank you for the opportunity to provide comment on the LURP review. Avoca Valley Limited are committed to progressing the proposed residential development and look forward to the inclusion of the subject area into the district plan.

We ask that our comments are given due consideration.

**Avoca Valley Ltd**  
**29 May 2015.**

**Appendix 1: 2013 LURP submission**

*Address for Service:*

*C/- Resource Management Group Limited*

*PO Box 908*

*Christchurch Box Lobby*

*CHRISTCHURCH 8140*

*Attention: Melanie Foote*

**APPENDIX 1: Original submission on the LURP**