28 May 2015

Resource and Environmental Management Consultants

Comments on Land Use Recovery Plan Review
Environment Canterbury
PO Box 345
Christchurch 8140

Dear Sir / Madam

PO379

COMMENTS ON LAND USE RECOVERY PLAN REVIEW

RJ & CB SISSONS – 5 & 9 JOHN PATTERSON DRIVE

Background

We own 4.0215ha area of land located at 5 John Patterson Drive, to the south west of Halswell Junction Road. We also co-own the adjoining 4ha property at 9 John Patterson Drive.

John Patterson Drive contains eight small rural sites each of around 4ha each in area, used for a number of rural uses including horse breeding, grazing, and rural lifestyle residential use. The combined properties land total 27.42ha in area excluding the motorway designations. The land is identified in the plan attached as **Appendix One.**

We and all other John Patterson Drive landowners submitted on the original 2012 LURP, and preceding Proposed Plan Change 1 to the RPS, seeking that the land be included within the Christchurch Urban Limit. Since then, circumstances surrounding the land have changed, which further strengthens the case for inclusion as a greenfield priority area as part of the current LURP review.

The John Patterson Drive land is completely surrounded by non-rural activities as contained in the Operative Christchurch City Plan, as follows:

- North – Southern Motorway designation and Industrial P zone
- West – Southern Motorway designation and Industrial P zone
- East – Existing Living G (Halswell) zone
- South – Busch Lane Rural Residential enclave (2 ha rural residential sites located in rural zone but with no rural farming activity)

Since the LURP and directed changes to the Canterbury Regional Policy statement were confirmed in 2012, additional zoning is now proposed through the Proposed Christchurch City Replacement Plan that results in further encroachment of urban activities on the land. Of particular relevance is the proposed extension of the adjacent Residential S zoning of the Halswell West / Knights Stream subdivision into land contained in the John Patterson Drive block to the west of Knights Stream beyond the projected infrastructure boundary in Figure 4, Map A of the present LURP. A copy of proposed Planning Map 44 showing the additional land, and overlaid with the present LURP details is attached as **Appendix Two.**

This land was previously proposed as a district park. The developers intend to relocate the park to a new location fronting Halswell Junction Road, and to now develop the area to the west of Knights Stream for housing. Copies of the existing and proposed Halswell West Outline Development Plans

Resource Management Group Ltd
Phone 03-943 4112
Level 4, 69 Cambridge Terrace
PO Box 908,Christchurch Box Lobby , Christchurch 8140

are attached in **Appendix Three.** We understand that these changes are also supported by the Christchurch City Council greenspace unit. The changes have significant negative consequences for the remaining John Patterson Drive land, and will weaken the urban/rural interface in this location.

At the time the LURP was promulgated in 2012, the District Park proposed for this land provided a buffer between proposed rural and residential areas. The land was included within the greenfield priority area as the park would be an urban activity – however it was not intended to be developed for housing hence is was not contained within the projected infrastructure boundary. The original rationale behind the park location was that it would provide a buffer between the rural and residential areas, but that Knights Stream would form a defensible western edge to the residential development, as proposed in the original UDS and Southwest Area Development plan which preceded and informed the development of PC1 and the LURP. This will no longer be achieved.

The new road access to replace the existing Springs Road intersection was also intended to serve the rural sites in John Paterson Drive only. This will also now no longer be the case. Residential development will now share the new road access being provided by NZTA.

Additional Industrial zoning is also now proposed in the business priority areas opposite Springs Road to the west of the land.

Implications of Changes

The further encroachment of non-rural activities into and around the John Patterson Drive land means that urban activity now extends into the block and surrounds it on three sides. The remaining adjoining land to the south comprised in Busch Lane is also non-rural in nature, containing a rural-residential enclave. John Patterson Drive will share road access with the Knights Stream / Halswell West subdivisions, resulting in significant traffic generation and an almost complete loss of remaining rural amenity values.

The adverse effects of this continued urban encroachment onto and into the block means that the land is now even less able to sustain rural farming activities, due to stock disturbance, vandalism and reverse sensitivity effects.

The adverse effects arising from the circumstances that the land has been placed under as a result of this encroachment means that the land can no longer be sustainably managed for permitted rural activities, and the owners of the land can no longer provide for their economic or social wellbeing, which is contrary to the stated purpose of the Resource Management in section 5(2). Further, the situation is inconsistent with section 7(b) of the Act, which is to be had particular regard to, in that the efficient use and development of natural and physical resources is not achieved.

We consider that the resultant situation is inconsistent with specific objectives of the Canterbury Regional Policy Statement (CRPS) including:

- Objective 5.2.1(e) - it does not enable rural activities that support the rural environment including primary production
- Objective 5.2.1(i) – it does not avoid conflicts between incompatible activities
- Objective 6.2.1(7) – it does not maintain the character and amenity of the rural area

We consider that the most sustainable future use of the remaining John Patterson Drive block is for residential activity. The following reasons support this:

- The land is effectively incapable of continued rural use.
- Reverse sensitivity effects will be avoided.
- The rural-residential land to the south (Busch Lane) provides a better defined and defensible urban boundary.

- The extension of residential development across Knights Stream into the John Patterson Drive block in the Proposed Christchurch City Replacement Plan means that the stream no longer forms a defensible residential boundary.
- The land can potentially accommodate approximately 270 residential sections based on RPS target densities of 15 households per hectare which will contribute towards providing land necessary for earthquake recovery.
- The land immediately adjoins the present urban boundary and is contiguous to the Halswell West priority area.
- The minor potential additional households and change to urban boundaries is still consistent with the overall achievement of the Greater Christchurch Land Use Recovery Plan (LURP) and Canterbury Regional Policy Statement (CRPS) objectives and policies.
- The land will be provided with urban standard road access from Halswell Junction Road as part of the Stage 2 Southern Motorway extension.
- The land is geologically stable – there is no history of liquefaction or other geotechnical constraints affecting the site. It is better suited to residential development than many other greenfield priority areas contained within the present urban limit.
- The land is able to be serviced with urban standard reticulation using developer funded upgrades, and existing infrastructure.
- The block effectively "fills the gap" in the existing urban boundary, creating a more logical urban form.
- The land was identified as being "greenfield suitable" in the original 2006 "Inquiry by Design" report, which was a precursor to the Urban Development Strategy, which informed Proposed Change 1 to the Regional Policy Statement (RPS) and ultimately the present LURP and CRPS. It was also recommended for inclusion within the PC1 greenfield areas in the original PC1 officer reports – although this changed when Variations 1 – 4 to PC1 were notified.
- It is apparent from this history that the ultimate non-inclusion of the land within greenfield development areas in the present LURP was simply a result of a "trade-off" of limits imposed on household numbers in PC1 – with the land otherwise being highly suitable (and in some cases more suitable than other included greenfield areas such as Hendersons Basin) for urban development.

Although the land falls outside the current greenfield priority areas and urban boundary identified in the LURP and CRPS, we consider that residential use of the land is consistent with the overall achievement of the relevant objectives and policies contained within them. It is better suited for residential development than some other areas contained within the current urban limit, from both a site suitability and infrastructure perspective.

In particular it represents only 0.6% change in the total household numbers anticipated in the period to 2028 by the present LURP and Chapter 6 of the Canterbury Regional Policy Statement (CRPS), and in an overall context this is well within the margin of error of forecasts and is not a significant change.

It results in a minimal change to the overall pattern of development and urban growth, and does not require additional extension of infrastructure. It is essentially a filling in of a small anomaly in the urban boundary, resulting in a more logical and sustainable urban form.

It remains consistent with CRPS Objective 6.2.1(11) in that it will optimise use of existing infrastructure, and is not inconsistent with CRPS Objective 6.2.2(4), as the overall city wide pattern

of urban growth is not significantly altered, and it is in a location that will assist in meeting anticipated demand and enables efficient use of network infrastructure.

The broader overall urban form in Map A of the LURP and CRPS is still achieved in terms of Policy 6.3.1(1) as the small area and location of the land is of low significance in a city wide urban growth context.

Flexibility of Urban Boundaries

We are also concerned at the inflexible approach contained in the present LURP and CRPS towards minor changes in the boundary and location of the urban boundary and greenfield priority areas. The Christchurch City Plan is presently under review, and subject to submissions seeking changes to urban zonings on the city fringe. In some cases the changes sought would result in relatively minor changes to the composition of greenfield priority areas, and can be achieved without adversely impacting on infrastructure provision, overall urban form, or the overall achievement of the LURP and CRPS Objectives.

Proposals which are otherwise well suited (and in some cases better suited than existing priority areas) for urban development are unduly penalised by this overly directive approach. This potentially results in poor planning outcomes.

We consider that the CRPS should provide flexibility for minor changes in the urban boundary and location and composition of greenfield priority areas to be considered by local authorities in District Plans, where they are not inconsistent with the overall achievement of the LURP and CRPS Objectives.

Comments

For the above reasons we make the following specific comments on the LURP review:

Comment 1

LURP Figure 4 – Map A Greenfield Priority Areas

We **seek** that all properties in John Patterson Drive as identified in the **Appendix One** plan be included as a Greenfield Priority Area in Map A.

Comment 2

Appendix 1 – Amendments to Canterbury Regional Policy Statement

Chapter 6, Map A Greenfield Priority Areas

We **seek** that all properties in John Patterson Drive as identified in the **Appendix One** plan be included as a Greenfield Priority Area in Map A.

Comment 3

Canterbury Regional Policy Statement

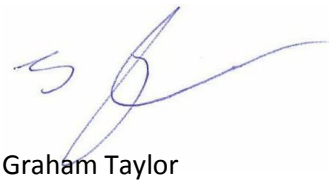
We **seek** an additional action point that requires Environment Canterbury to change Chapter 6 of the Regional Policy Statement to allow District Councils to make minor amendments to zoning and development boundaries indicated by the urban limit boundary and priority areas contained in Map A.

Concluding Comment

Thank you for the opportunity to provide comment on the LURP review. We ask that our comments be given due consideration, and would be pleased to discuss these matters further if necessary.

We also ask that we are kept informed of the progress of the LURP review.

Yours sincerely
Resource Management Group Ltd



Graham Taylor
Director
For and on behalf of RJ & CB Sissons

Address for service

RJ & CB Sissons

c/- Resource Management Group Ltd

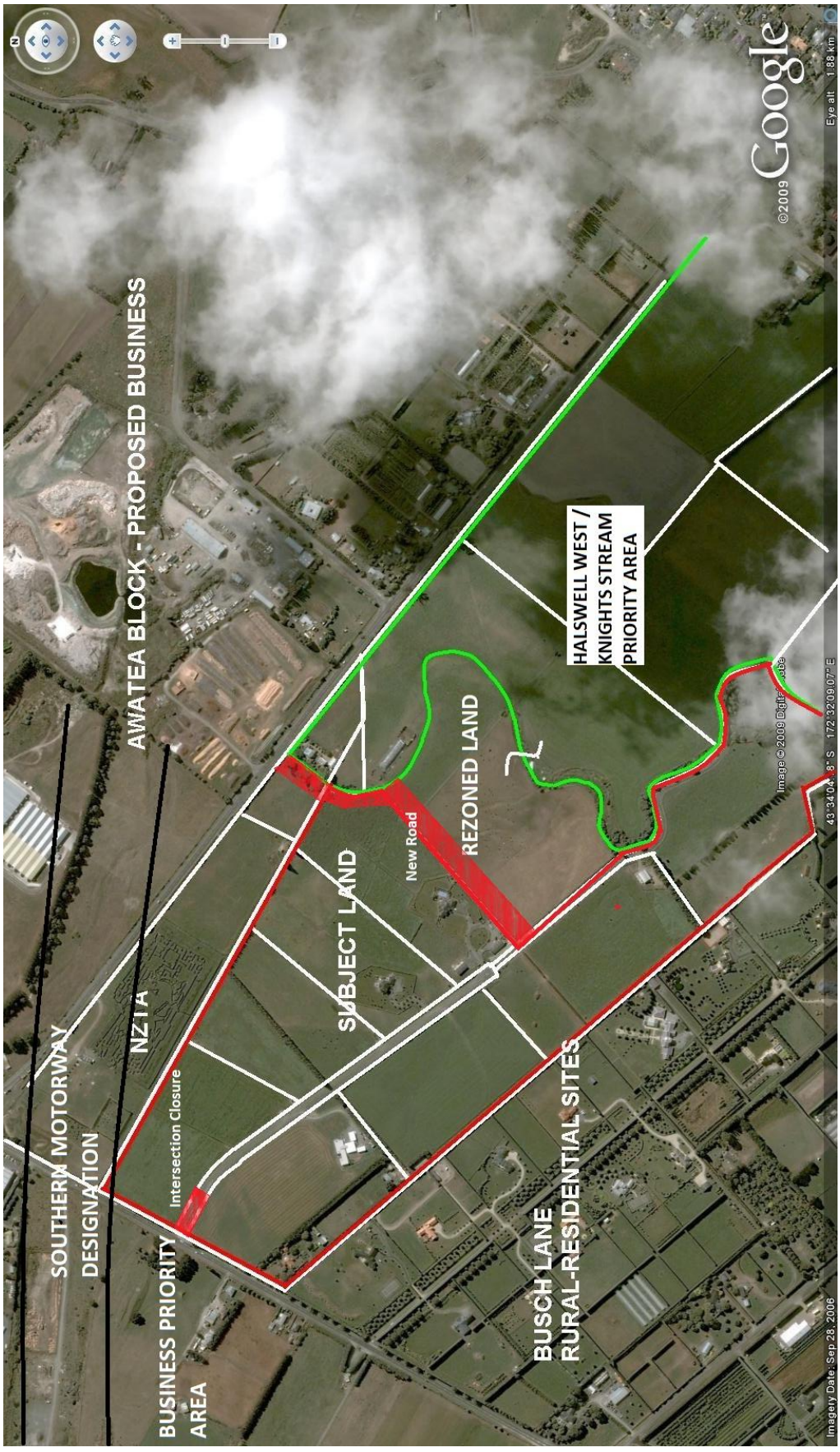
P O Box 908

Christchurch Box Lobby

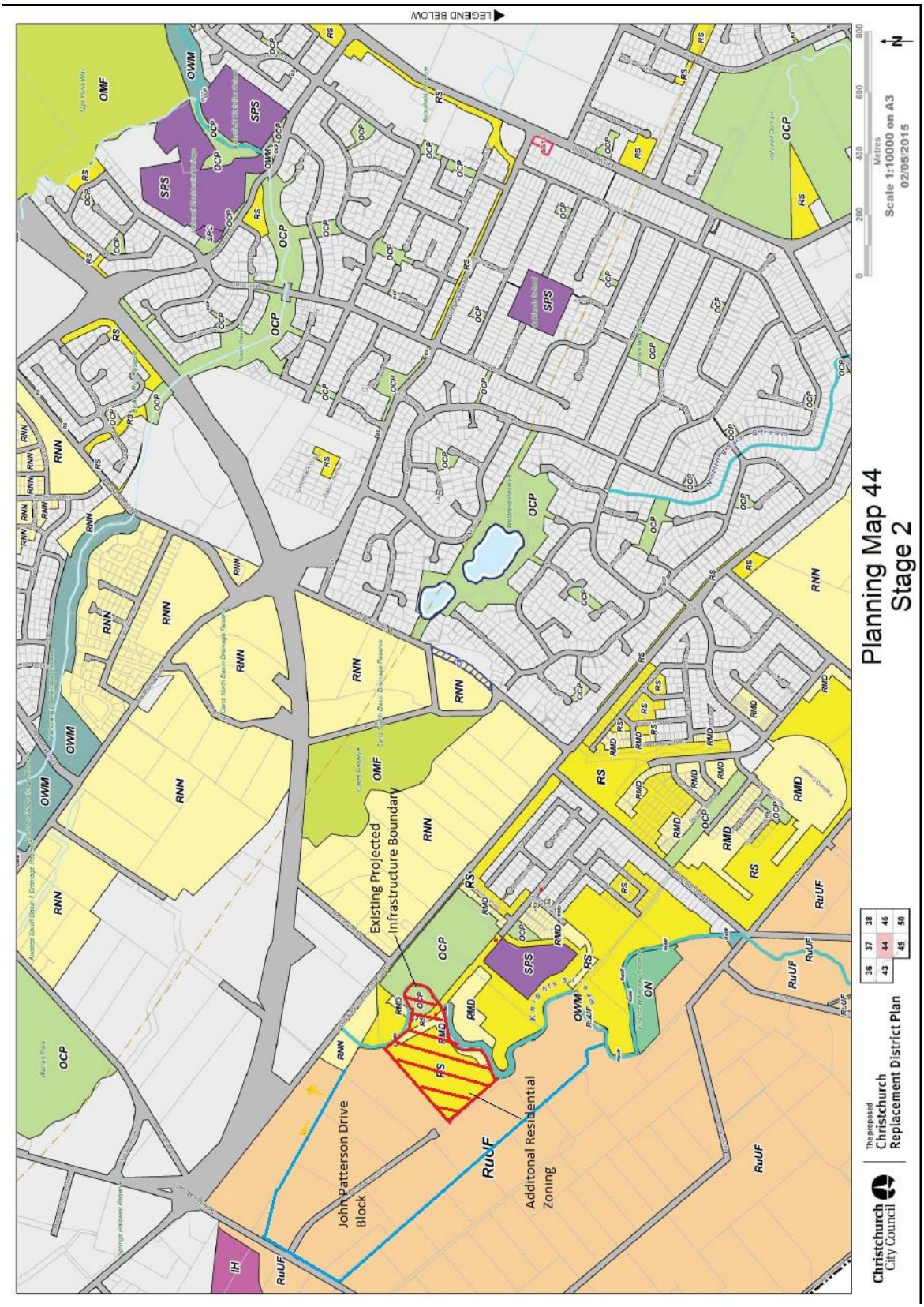
Christchurch 8140

Attention: Graham Taylor

Appendix One – John Patterson Drive Properties

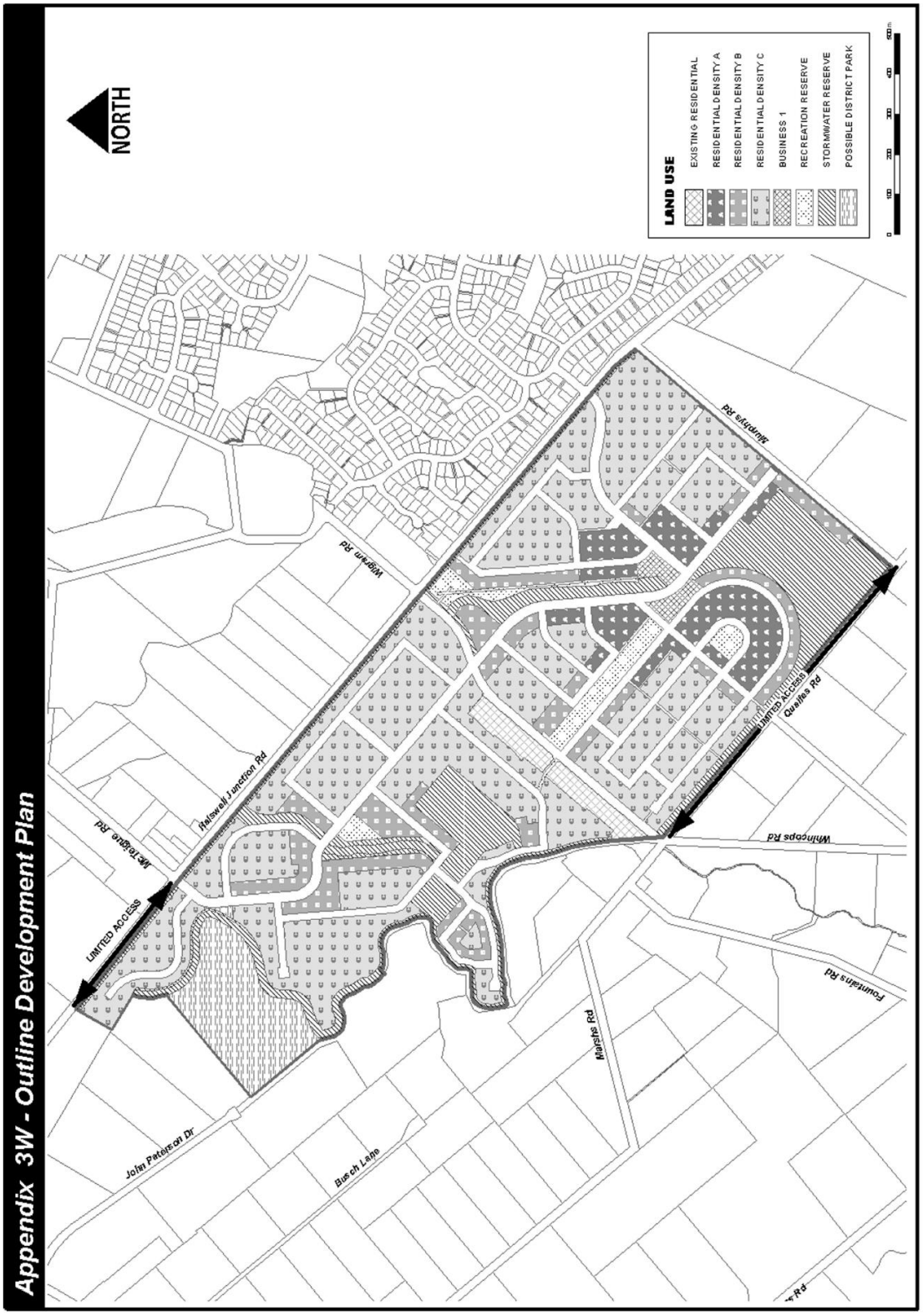


Appendix Two – Proposed Christchurch City Plan Map 44 showing City Plan residential zone extension

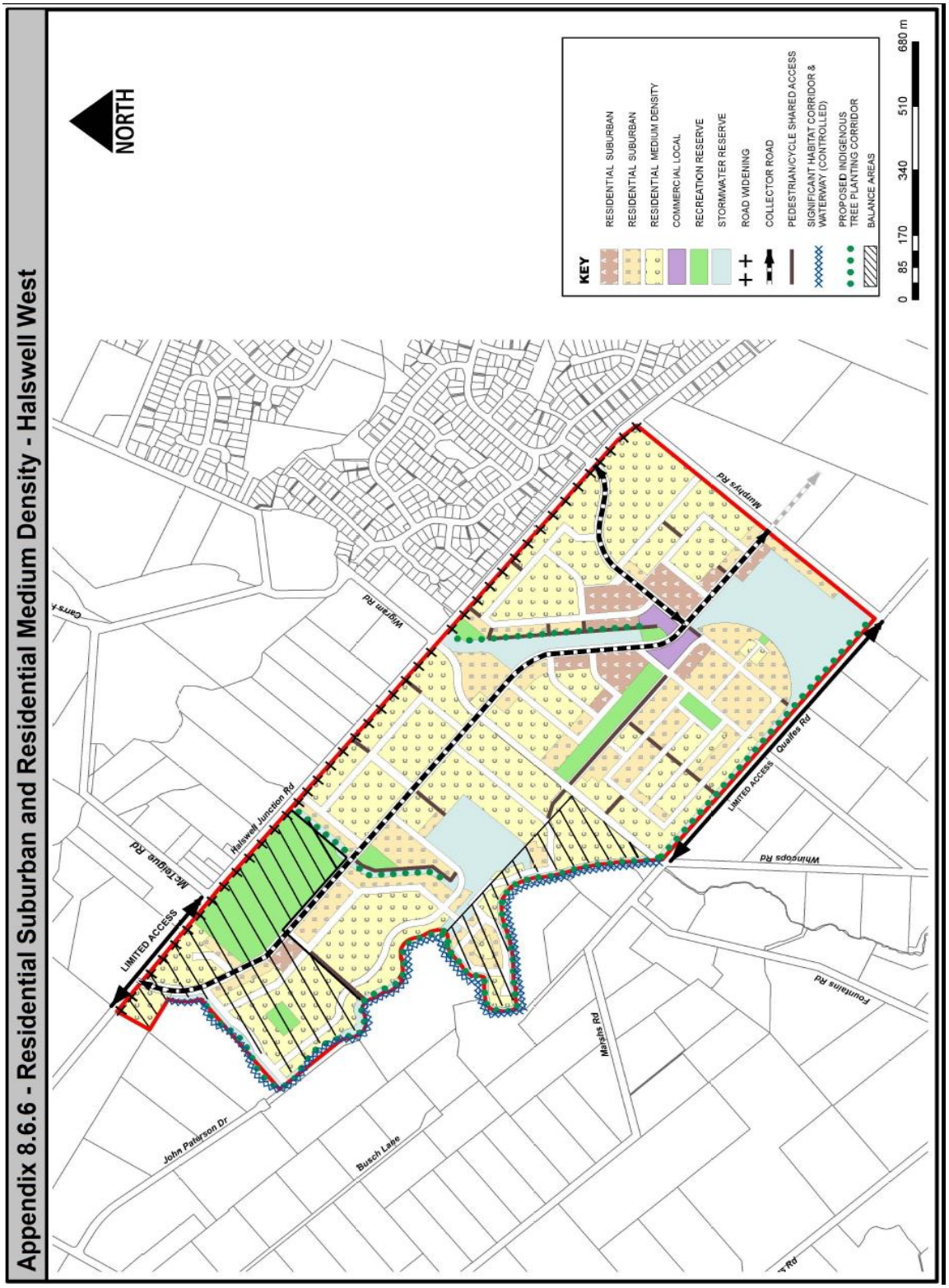


Appendix Three – Existing and Proposed Amended Halswell West Outline Development Plans

Volume 3 : Part 2 Living Zones : Appendix 3W - Outline Development Plan (Halswell West)



Existing ODP



Proposed City Plan ODP

Appendix Four – NZTA Road Changes

