

From: [Lyn Parlane](#)
To: [Mailroom Mailbox](#)
Cc: [Jason McDonald](#)
Subject: Mr Slava Meyn - Comments on Land Use Recovery Plan Review - pdf version.PDF [DC-Documents.FID1727884]
Date: Friday, 29 May 2015 3:12:59 p.m.
Attachments: [Comments on Land Use Recovery Plan Review - pdf version \(5405578 1\).PDF](#)

Please see attached

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29 May 2015

Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

Attention: Mr Bayfield, Chief Executive

COMMENTS ON LAND USE RECOVERY PLAN REVIEW

Introduction

1. This feedback is provided by Mr Slava Meyn in accordance with section 5.4 of the Land Use Recovery Plan ("**LURP**"), which directs Environment Canterbury to obtain the views of greater Christchurch communities generally in undertaking its review of the LURP.
2. Mr Meyn owns the site at 466-482 Yaldhurst Road, Christchurch (Lot 2 DP 59957, Lot 1 DP 78059 and Lot 2 DP 64235). This land is identified beyond the Projected Infrastructure Boundary in Map A of the Regional Policy Statement (RPS), with that boundary running along Yaldhurst Road. An extract of Map A of the RPS identifying the site is included in **Attachment 1**.
3. The site is approximately 19.8 ha in area and is being progressively developed as a recreational (football) facility known as the Christchurch Football Academy (CFA), having obtained resource consent for this activity in 2014.
4. The consented CFA development includes:
 - Two full sized, and six mini, artificial football fields (two of the mini fields are covered)
 - One full sized natural turf football field
 - A large (two-storey, 1900m² GFA) clubroom building containing changing rooms, coaches room, offices, therapy, reception and pro shop, bar, kitchen and seating / function areas.
 - Covered stadium seating attached to the clubrooms for 300 persons, and stands for a further 900 persons adjacent to the playing fields.
 - 697 car parking spaces and access to/from the site via the signalised intersection of Yaldhurst Road and Sir John Mckenzie Avenue.
5. The first stage of the CFA development has just been completed and will be officially opened on 1 June 2015.
6. Mr Meyn has publicly stated his aspirations to further develop the site (and potentially adjoining land to the south) for recreational activity that complements the consented and developed football activity on the site, utilises physical improvements to the site (e.g. signalised access, car parking, etc), and helps meet the needs for sporting codes in Christchurch.
7. Such a complex could provide a variety of sporting facilities including the football academy, rugby, gymnastics, and swimming facilities as 'anchors' with the potential for indoor multi-sport facilities and ancillary services such as sports medicine.

8. A site plan of the consented CFA development and master plan illustrating Mr Meyn's aspired development of the land are included in **Attachment 2**.
9. Mr Meyn proposes to submit on Phase 2 of the Christchurch Replacement District Plan to seek provisions that recognise and support the consented recreation activity on the site and otherwise provide for an appropriate extent of additional recreational activity.

Planning Context / Background

Proposed Change 1 / North West Review Area

10. The site was identified as a Special Treatment Area within the urban limits in Proposed Change 1 (PC1) to the Regional Policy Statement, pending further consideration. In terms of that further consideration, the City Council's North West Review Area report identified the site as being within an area that is *'most appropriate for peri-urban activities including active and passive open space, sport and recreational and community facilities that serve the urban area'*.

Recovery Strategy for Greater Christchurch

11. The desired recreational use and development of the subject land is generally consistent with the Recovery Strategy's general vision and goals for the recovery of Greater Christchurch.
12. Importantly, the Strategy does not present any obstacles to either proposal and several Strategy goals could be said to be supportive of the development. For example: economic recovery goal 2.5 to identify and facilitate increased opportunities for early and substantial local and international investment; and cultural recovery goals 4.2 and 4.3, that seek to resume and encourage participation in recreational and sporting activities.

Land Use Recovery Plan

13. The LURP is generally supportive of new development and redevelopment opportunities in Greater Christchurch. The LURP does not specifically seek provision for new recreational development opportunities and the body of the LURP says little on the issue of recreational facilities, with the exception of the need to consolidate and develop Key Activity Centres (which by definition include recreational activities) and providing housing close to recreational facilities and spaces. Again, importantly, the outcomes sought and planned actions as expressed in the body of the LURP do not conflict with the desired recreational development of the land.
14. The LURP amendments to the RPS identified the site in Map A as being beyond the Projected Infrastructure Boundary and Christchurch Urban Area.
15. The RPS also introduced definitions for 'rural activity' and 'urban activity', with both of these definitions referring to recreation facilities. Rural activities include *'large footprint parks, reserves, conservation parks and recreation facilities'*. Urban activities include *'sports fields and recreation facilities that service the urban population (but excluding activities that require a rural location)'*.
16. The definitions above are critical to the desired recreational development of the site as supporting policy directs that new urban activities only occur within existing urban areas or identified greenfield priority areas, unless they are otherwise expressly provided for in the CRPS (Policy 6.3.1).

17. Although the site was inside the urban area in Plan Change 1 and the preliminary draft of the LURP, the final version of LURP identified the site as adjoining but outside the proposed urban area. Accordingly, if the facility were found to be an urban activity, it would be very difficult for further recreational activity to establish.
18. Mr Meyn considers that the consented CFA activity is a large footprint recreation facility requiring a rural location that could fall within the definition of rural activities due to: the difficulty of obtaining large areas of undeveloped land in the urban area; the costs of such a land purchase; and potential reverse sensitivity effects from locating a large scale recreational facility in a dense residential environment.
19. In addition, while Mr Meyn's recreational activity is of regional benefit, the primary population base benefiting from the recreational activity, aligns with the urban population base of Christchurch City
20. However there is room for debate on whether the desired/aspirational recreational facilities is a rural activity or an urban activity and this lack of clarity presents significant uncertainty and risk to that development.
21. Noting the above, it would be of considerable assistance if the LURP were to insert provisions into the Regional Policy Statement to make clear that the site and adjacent land to the south is suitable for a large footprint recreational development as is consented and is otherwise desired.
22. One solution would be for the urban limits to be amended to include the site and adjacent land to the south, thereby removing any potential debate around whether the site should or shouldn't be located in the rural area. This would not undermine or conflict with any of the other goals of the LURP or the provisions of the Regional Policy Statement and would ensure that a development that would be of considerable benefit to the social and cultural recovery of the city, could proceed.
23. In the alternative, considered wording changes to the definitions of rural activity and urban activity (insofar as they concern recreation facilities) might otherwise assist. It is noted that there are significant synergies, if recreational activities can co-exist for reasons of shared facilities, such as carparking, training facilities, and amenities that are required to provide an efficient sports hub.

Conclusion

24. Mr Meyn generally supports the current wording of the LURP and the directions provided within it (including those provisions in the RPS). However, as detailed above, Mr Meyn considers that:
 - Greater recognition needs to be given to the recreational and sporting needs of the community within the body of the LURP generally, including the role of public and private sporting facilities in meeting these needs;
 - The definition of 'urban activity' and 'rural activity' in the RPS requires further consideration and clarification as it relates to recreational activity, noting there is considerable uncertainty as to how these definitions apply to facilities such as those at Yaldhurst, or others in Christchurch's rural areas.
 - The Projected Infrastructure Boundary in the RPS should be revised in the Yaldhurst area to accommodate Mr Meyn's site and adjacent land to the south (towards Russley Road), in recognition of the consented and aspirational recreational activity on this land (see **Attachment 3**).

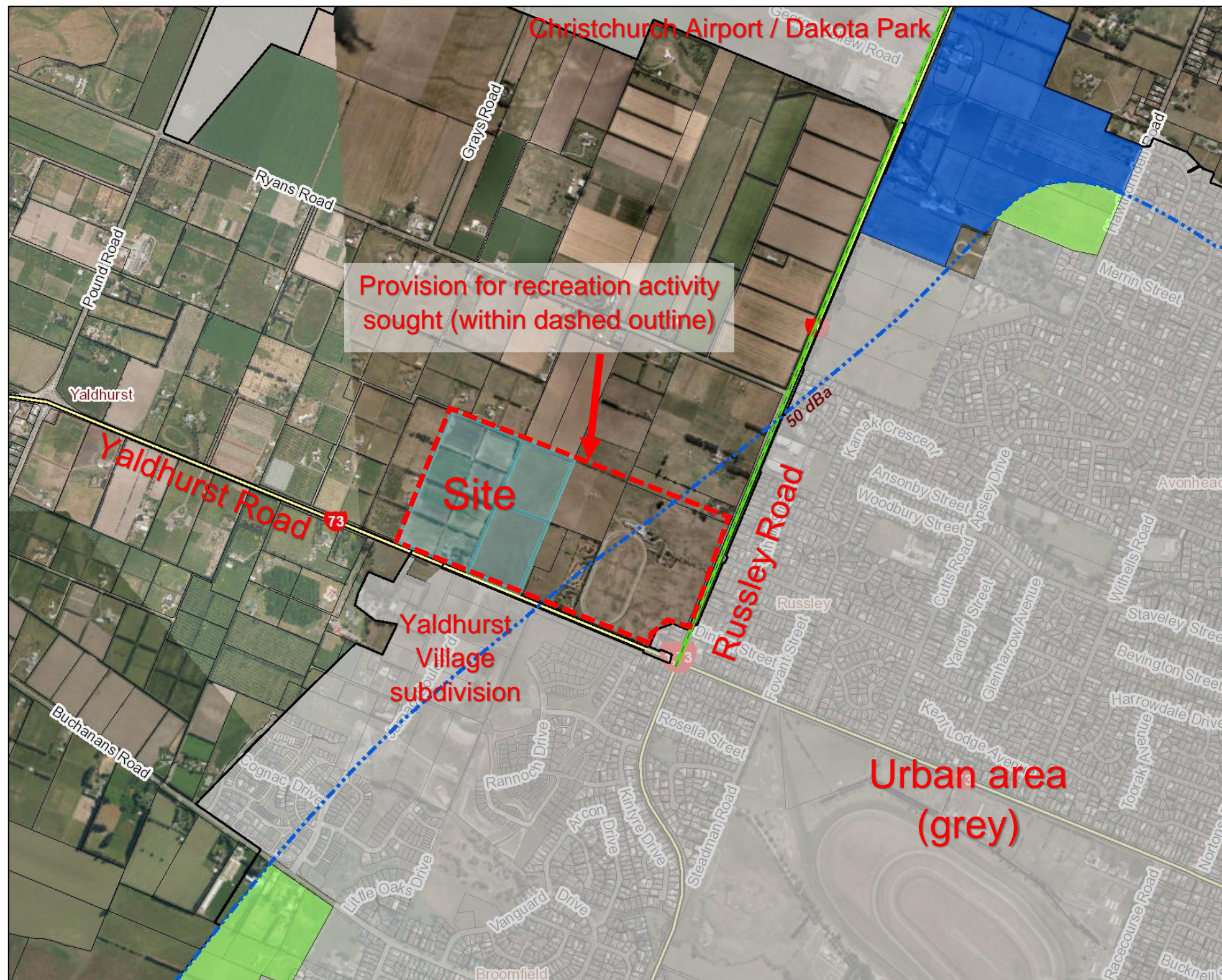
25. Mr Meyn would welcome the opportunity to be involved in the formal LURP review process going forward.

Yours sincerely

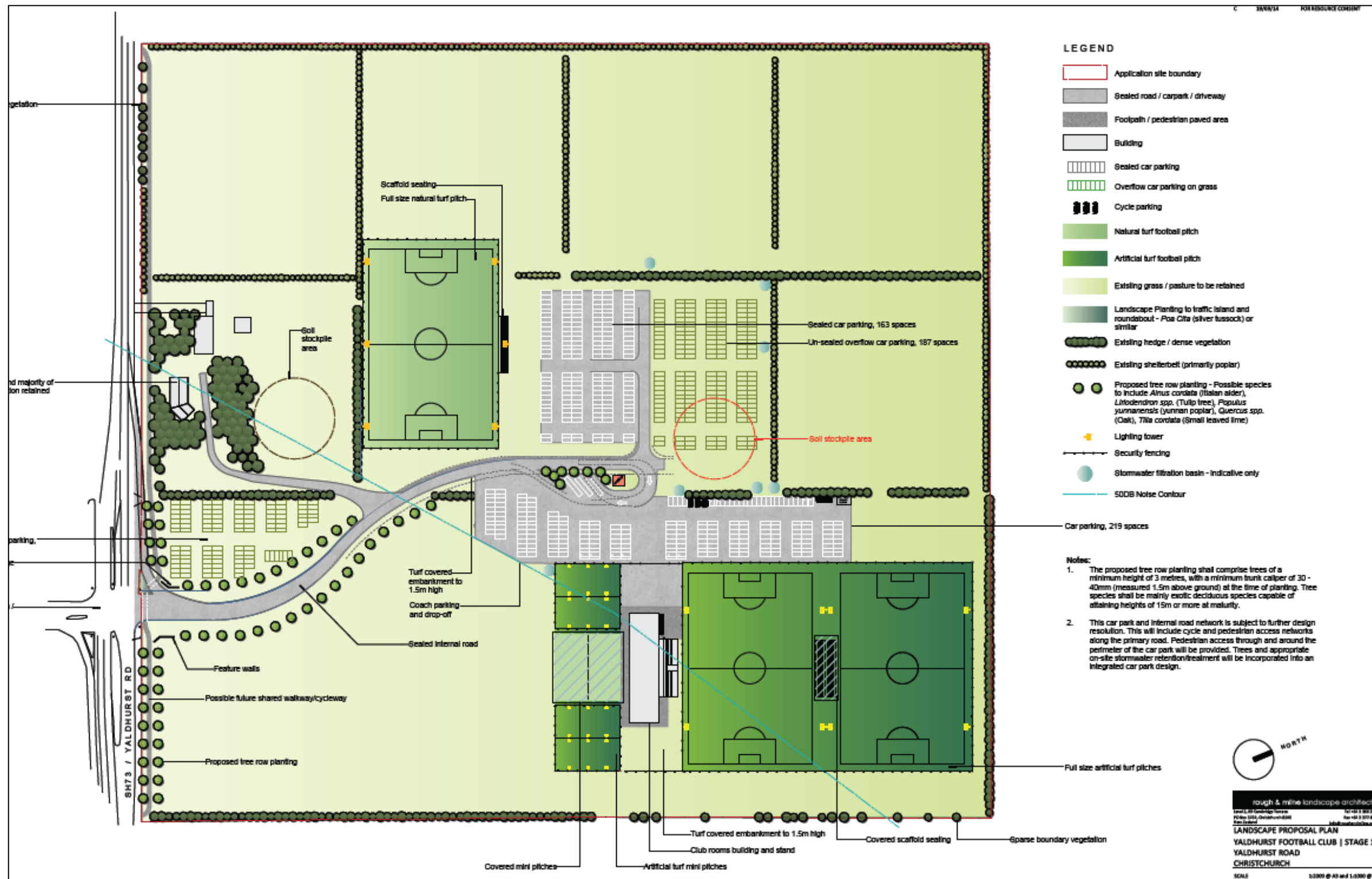
Ewan Chapman

Counsel for Mr V Meyn and filed on his behalf

Attachment 1: Extract of Map A of the RPS identifying the site



Attachment 2: Site plan and master plan



Approved resource consent plan

Attachment 3: Amendments sought to Map A of the RPS

