

COMMENT FORM

Land Use Recovery Plan Review: Draft Recommendations

Comments can be emailed to:
lurp@ecan.govt.nz or posted to:
Comments on Land Use Recovery
Plan Review Environment
Canterbury
P O Box 345
Christchurch 8140

SUBMITTER ID:
FILE NO: LAND/LURP/PLAN/1

All comments to be received by 5pm, Friday 28 August 2015

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Signature:

Date: *28.8.15*

(Signature of person making submission or person authorised to sign on behalf of person making the comment)



**Please note: All information contained in comments provided, becomes
Comments**

Position statements on section 3.2: Do you agree with these?

Whist it is accepted that the LURP established a degree of certainty it is submitted that there is insufficient flexibility associated with Chapter 6 of the RPS. Amendments should be made to address land which either represent an anomaly in terms of location and zoning but would still provide an urban growth outcome which supports the objectives and policies and lead to a more sustainable urban community in terms of access to amenities, can be serviced and access to public transport.

The position of the LURP monitoring support is a broad overall judgement and makes no allowance for land which is suitable for alternative uses and an example can be found in the land subject of these comments. As

such it is not accepted that there are compelling arguments for retaining the LURP in the present form without some flexibility to recognise better land use outcome.

Draft Recommendation 1: The LURP Review should principally identify any areas for further consideration through more traditional statutory mechanisms rather than attempt to resolve them directly by recommending changes to the LURP.

The consideration should be whether there is justification for giving further consideration to the LURP. If there is, then the provisions should be amended to recognise the changing (and reduced) role of the LURP in terms of recovery.

Draft Recommendation 2: Any consideration of significant change is best undertaken through a more comprehensive future spatial planning process or in the review of the Regional Policy Statement including:

- any consideration of additional greenfield land
- any consideration of further intensification initiatives
- any consideration of further significant investment in strategic infrastructure

It is recognised that a wider review of the RPS is needed but it is largely only relevant in terms of “significant” land use change. There are a number of circumstances where there is a compelling reason to include additional land now as part of achieving a more sustainable urban outcome, without waiting for the more comprehensive review.

Draft Recommendation 3: The Minister amend the LURP to show Figure 4 on page 23 of the LURP as being ‘indicative’ only, and remove Appendix 1 relating to Chapter 6.

This outcome is supported, if as understood, it would bring an element of flexibility to allow “small” areas of development to occur without offending the LURP.

Draft recommendation 4: The Minister direct Waimakariri District Council to amend Policy 14.5.1.1 as set out in the District Plan as follows: ‘To avoid new residential and rural residential activities and development outside of existing urban areas and priority areas within the area identified in Map A in Chapter 6 of the Canterbury Regional Policy Statement; rural residential development areas identified in the Rural Residential Development Plan; and MR 873.’

This recommendation is not supported and appears to run counter to recommendation 4. The opportunity for some flexibility in addressing Map A is necessary in Waimakariri.

Draft recommendation 5: The Minister add an additional sub-action to LURP Action 27 to read: ‘vii. zoning that defines the Lincoln Innovation Hub’.

N/A

Do you have comments on matters where the LURP Review is not recommending change?

These matters are set out in the attached comments.

Re section 3.3.3: Development outside greenfield priority areas: Do you have views on the conclusion reached?

There may be an argument that Chapter 6 has greater flexibility to address minor developments. However there is justification for amending Chapter 6 to include small areas of land suitable for residential development where this would represent a significantly enhanced urban outcome and more sustainable communities.

Re paragraph 3.3.6: Greenfield Priority Areas for Business in NW Christchurch: Do you have views on the approach to the greenfield priority areas for business in north-west Christchurch?

N/A

Any other comments:

N/A