

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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*The organisation that this submission is made on behalf of

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Signature:



Date: 28 August 2015

Comments

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

Stmt 8: I agree that there are aspects of the LURP that need modification – to then enable reasoned growth and development outcomes to ensue without being stymied by the LURP (“decision making under the RMA must not be inconsistent with the LURP”).

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.

I semi agree in so far as the LURP should have some reference to lower level statutory mechanisms (CRPS, Dist Plan etc) being able to deal with matters that generally align with the LURP. For example enabling additional

areas of land just beyond an urban limit boundary to then be considered for future growth and development rather than being immediately and totally dismissed just because of the precise positioning of that boundary.

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

Refer to comment in Draft Recommendation 1: above.

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.

I agree with Figure 4 being "indicative only", and consequential amendments to Appendix 1

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.'

No comment.

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

No comment.

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

I am totally dismayed with the CIAL noise contours and their strong impact on growth and development. My view is that the noise contours levels are unnecessarily low, and are based on modelled projections that are totally unfounded and now being proved to be overexaggerated. Yet CIAL and the regional/territorial authorities seem to be supportive of each other with the result that there is no practical avenue to any effective challenge to their effects.

I would like the LURP to incorporate a directive for a review of the noise contours in terms of reasonable (industry standard) noise levels and alignments relative to updated and realistic projections of aircraft movements. Only then can the City accept and respect the contours as a meaningful and realistic planning control mechanism.

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

I note your comments that the strategic partners consider that flexibility exists / there is scope to consider growth and development outside the Greenfield Priority Areas. To date all I have been hearing from the Territorial Authorities is that the greenfield priority area/urban limit boundaries are plain to see and anything beyond the same is immediately dismissed as being "inconsistent with the LURP/CRPS". So the reality is that there appears to be no flexibility and we are wasting our time seeking anything beyond the prescribed boundary lines. I reiterate that there needs to be some degree of flexibility of where urban and priority area boundaries lie. Properties just beyond these boundaries should be considered for growth and development rather than being dismissed as described above.

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?

No comment.

Any other comments:

No further comment.