

LURP REVIEW: COMMENTS ON ECAN'S DRAFT RECOMMENDATIONS

The Avonhead Community Group Inc. (ACG) thanks ECAN for the opportunity to comment on the draft recommendations to be sent to the Minister as part of the Land Use Recovery Plan (LURP) Review. The ACG agrees with ECAN's assessment in 3.3.6 that not rezoning greenfield priority areas for business in north-west Christchurch is still "giving effect" to the Canterbury Regional Policy Statement (CRPS) and the LURP in view of the wider context and purpose of these two documents. As ECAN's assessment shows, there is an adequate supply of industrial land for up to the next 15 years without rezoning North-West Review Area 3 (NWRA3) and the Memorial Avenue Investments Limited site (MAIL site) to industrial.

Further, as described in detail in the ACG's comments to ECAN dated 29 May 2015 and the Council's s 32 assessment, rezoning NWRA3 into industrial would lead to severely detrimental effects on the environment and infrastructure in a manner contrary to CRPS 6.2.1(6), (9)-(11), 6.3.5, 18.3.1(3), and LURP Outcomes 1, 2, 11 and 12. These factors mean that the identification of NWRA3 as a Priority Greenfield Business Zone is inappropriate, and that therefore, not proceeding with an industrial rezoning would still be giving effect to the CRPS and not be inconsistent with a purposive view of the LURP.

The ACG further requests that ECAN recommend that the NWRA3 and MAIL site no longer be identified as Priority Greenfield Business Zones in the LURP. While the Priority Greenfield Business Zoning leaves it open for the two sites *not* to be rezoned as industrial, it creates a potential for confusion in the Christchurch Replacement District Plan. Removing these two sites from this identification would resolve the confusion and make it clear that they are not to be considered for business or industrial development.

The ACG does not think that the fact that the independent hearings on the MAIL and Industrial Chapter of the Christchurch Replacement District Plan will be underway in September – October 2015 prevents such a recommendation by ECAN. Instead, the recommendation would be consistent with Council's notification of NWRA3 as a Rural-Urban Fringe Zone in Stage 2 and the Crown's opposition to submitters 2183 and 2278 in its further submission on Stage 2 for seeking an industrial rezoning of NWRA3.