

LAND USE RECOVERY PLAN REVIEW

Comments on Submissions and Draft Recommendations

COMMENTS BY: RAVENSWOOD DEVELOPMENTS LIMITED

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BACKGROUND:

Ravenswood Developments Limited (RDL, a subsidiary of Infinity Investment Group Limited) is the owner of land known as 'Ravenswood' located near Woodend adjacent to State Highway One. In 2009 Infinity initiated a change to the Waimakariri District Plan to alter the zoning of Ravenswood from rural to residential use. This plan change was approved by the Waimakariri District Council and was the subject of two appeals, both of which were resolved by consent.

The majority of the site is zoned residential in the Waimakariri District Plan, with two areas zoned Business 1 and Business 2. The residential component of the site provides the opportunity for approximately 1500 residential sections, including intensive residential development. Additional areas will become a focal point for commercial, community, and service activities.

Map 1 of the LURP identifies the Ravenswood site as Greenfield Priority Areas – Residential and Business. The location of these areas is highlighted on the plan attached (Appendix 1). Also of relevance, the Woodend/Pegasus area is identified as a Key Activity Centre. This is also shown on the plan (Appendix 1).

COMMENTS:

The following comments relate to, and reinforce, the original comments made by RDL on the LURP review. RDL also provides specific comments on matters raised by other submitters and draft statements and recommendations on the LURP.

1. RDL continues to support the retention of the greenfield priority areas (residential and business) in the LURP on the Ravenswood site. Some variations in the delineation of the boundaries of the residential and business areas has and will continue to occur as detailed Ravenswood site planning and development occurs (and which is subject to approval by Waimakariri District Council).
2. Further to point 1 above, RDL supports the submission made by Waimakariri District Council (34) that:
 - *“Figure 4, Map A in the Land Use Recovery Plan be amended to show the Greenfield Priority Area – Residential to the north east of Woodend as ‘Greenfield Priority Area – Residential/Business’,*
 - *Environment Canterbury be directed to amend Map A in Chapter 6 of the Canterbury Regional Policy Statement to show the Priority Areas – Residential Zoned to the north-east of Woodend as “Priority Areas – Residential/Business”,*
 - *Waimakariri District Council be directed to amend the Waimakariri District Plan Planning Maps 125, 125A, 128, 128A to show the LURP Priority Areas – Residential Zoned to the north east of Woodend as “Priority Areas – Residential/Business”.*

RDL considers that this is not an ‘area of significant change’ and could be dealt with immediately by the LURP rather than through a more comprehensive future spatial planning process, in the review of the RPS or by more traditional statutory mechanisms. The traditional statutory mechanisms involve significantly more bureaucracy and, ultimately, greater cost and time delays to the wider community. RDL seeks that the level of bureaucracy is reduced where there is a clear benefit to all parties, including the community.

3. RDL continues to support the identification of the Woodend/Pegasus area as a Key Activity Centre, and the specific reference to this area in the definition of the term ‘Key Activity Centre’ contained in the LURP. RDL requests that this reference is retained in the LURP or other appropriate documentation.

Whilst Waimakariri District Council has addressed some of the matters relating to Key Activity Centres within the Waimakariri District by way of LURP Action 26 (and subsequent amendments to the District Plan), it did not specifically provide for a Key Activity Centre in the Woodend/Pegasus area for a number of factors. These included uncertainty over growth and its direction in this area.

RDL acknowledges these uncertainties. However given that RDL is now proceeding with the development of Ravenswood, and especially the

development of the Business land in the immediate future, it strongly requests that the identification of a KAC in this area be retained in the LURP to provide WDC and other interested parties with some direction in this matter and enable reconsideration of the KAC at Woodend/Pegasus at an appropriate time in the future. RDL does not consider that this matter has been considered thoroughly in the proposed draft recommendations on the LURP, and needs to be taken into account when dealing with proposed changes to Figure 4 of the LURP.

4. RDL owns a parcel of land immediately to the north of the land identified in the LURP as Greenfield Priority Area – Business for the Ravenswood site. This land (referred to as the ‘Lewis’ land) was purchased to provide stormwater treatment and management areas for the Ravenswood development. The background to the purpose of the purchase of this land in the context of stormwater treatment and disposal for the Ravenswood subdivision is contained in the original comments made by RDL on the proposed LURP reviews (attached as Appendix One to this submission). The use of the Lewis land for stormwater treatment and disposal has been recognised by relevant statutory organisations for over six years.

The issue of the use of land for infrastructural development outside the identified priority areas boundaries associated with the Ravenswood subdivision is understood to have been discussed with Waimakariri District Council, Environment Canterbury, and other District Councils. However, it appears that there are issues associated with the LURP as currently worded in terms of enabling the use of land adjacent to land identified for priority uses in the LURP.

It must be recognised by the CRC, and the WDC, that the *effects* of the use of the Lewis land for stormwater treatment and disposal purposes is not an *urban* effect. The appearance of the land is no different to having water storage ponds on a rural property. Using land for such purposes outside of the greenfield priority areas is of a similar effect to having a sewage treatment works for an urban area located outside of the greenfield priority areas.

Given the significance of this issue, RDL continues to require a high level of certainty to be provided. For this reason it requests that:

- (i) The boundary of the greenfield priority area (as it applies to Ravenswood) is extended to include the Lewis land, and that this area is specifically identified for the purpose of infrastructural development, servicing, stormwater management, and/or
- (ii) The relevant provisions of the LURP (and accordingly other statutory documents that are required to be consistent with the LURP) are altered such that it is clear to any user of the relevant statutory documents that

the land outside the boundaries of the Ravenswood greenfield priority area can be used for servicing associated with the land in that greenfield priority area.

RDL unfortunately does not consider that this matter has been fully considered in the proposed LURP review recommendations.

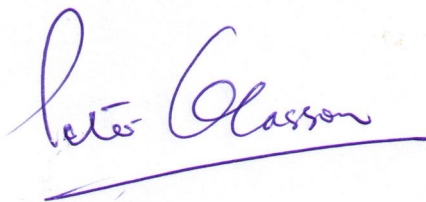
5. RDL opposes **draft recommendations 1** (*the LURP review should principally identify any areas for further consideration through more traditional statutory mechanisms rather than attempt to resolve them directly by recommending changes to the LURP*) **and 2** (*any consideration of significant change is best undertaken through a more comprehensive 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).

and any associated/related position statement to the extent that delays associated with these processes will not enable the timely resolution required of matters raised in points 1 – 4 above.

6. RDL **opposes 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*) **and any associated/related position statements** if this is considered in any way to discredit the notations pertaining to Ravenswood (greenfield priority areas – residential and business) and the Pegasus/Woodend KAC.

We would appreciate the opportunity to comment further on these matters, and participate in any associated processes.



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

Date: 28 August 2015



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Comments can be emailed to LURP@ecan.govt.nz or posted to:

Comments on Land Use Recovery Plan Review

Environment Canterbury

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All comments to be received by 5:00pm, Friday 28 August 2015