

## COMMENT FORM

### Land Use Recovery Plan Review: Draft Recommendations

Comments can be emailed to:  
[lurp@ecan.govt.nz](mailto: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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Organisation\*: ODP12b Landowners SDC

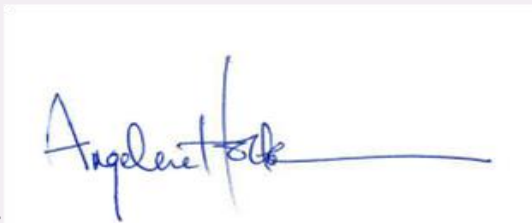
\*The organisation that this submission is made on behalf of

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Contact name and postal address for service of person making comment (if different from above):



Signature:

for ODP12b Landowners. 27 August 2015

## Comments

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

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 LURP process has taken four years to implement during which time the planning instruments available to the ODP12b landowners and the Selwyn District Council have been uncertain. This will be now further delayed with this proposed change to the LURP process. The SDC Council has already approved ODP12b for inclusion in the SDC and has drawn up an infrastructure and roading plan for the area as part of development of ODP12. This was then removed following confusion over the LURP process. The whole intended purpose of the LURP*

*process was to provide a process outside the 'traditional statutory mechanisms' and to rapidly provide additional land for earthquake recovery, certainty over areas for development, and fast tracking of recovery processes for developers and Council's. While it is agreed that the LURP process should facilitate recovery, this change should have been determined and agreed to at a much earlier stage in the process. This change now means ODP12b Landowners lose even more certainty and time before this area can be included with ODP12 for Rolleston. The LURP review requested feedback on changes that needed to be made to the LURP and in this case these changes were agreed to by both the ODP12b landowners and the Selwyn District Council. Despite this they have not been accepted for inclusion in the LURP and Map 1 has not been amended. Instead a further mechanism has been suggested reverting to existing planning instruments. This has not been a very satisfactory process for submitters where agreement of the Council has already been obtained.*

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

*The land included in ODP12b is not considered a significant change as agreement has been reached with the SDC and approved by the Council,. These decisions have been overridden by the LURP process and the confusion it now appears to have generated. The additional 'comprehensive future planning processes' will take even more time, more submissions and add to development costs without any greater certainty at this point in time. The ODP12b land meets already meets all the criteria for urgent inclusion in the LURP as the provision of wastewater services for the remainder of ODP12 development will not be able to occur efficiently without inclusion of this land. In addition the overall cohesion of ODP12, ODP10 and Farringdon community areas through the provision of CRETs, safe roads reserves and cycleways cannot currently be achieved for Southeast Rolleston. After two years we are still urgently seeking the reinstatement of ODP Area 12B into the LURP (Appendix 1 - Map 1) to recognise Selwyn District Council Plan changes. This land was included as Living Z in the SDC following the Minister's notification of the LURP on December 2014.*

*We request that the Minister direct the Selwyn District Council to amend the Selwyn District Plan for ODP12 to include ODP12b as a priority area for development as to be included in Map 1 of the LURP and Map A in Chapter 6 of the CPRS.*

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.

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, other than to note that the LURP process does appear here to be providing a mechanism to Council's to amend their District Plans where there is a clear need. We request the same recommendation to the Minister for ODP12b, as the Selwyn District Council has already submitted in support of the inclusion of this area in the LURP and SDC through this current process.*

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

*As per comments above. We request Action 28 of the LURP be amended and a recommendation to the Minister for ODP12b as this is supported by the Selwyn District Council. Clearly this is possible in some*

*circumstances as demonstrated here.*

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

*Yes, we recommend ODP12b be urgently included in the LURP or any future planning processes as a matter of priority. The additional 'comprehensive future planning processes' will take even more time and greater guidance from CERA and Council's is needed if these are to succeed. Currently ODP12b land meets all the criteria for urgent inclusion in the LURP as the provision of wastewater services for the remainder of ODP12 development will not be able to occur efficiently without inclusion of this land.*

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

*As above. This has been an unsatisfactory 'consultation' process with no greater certainty for ODP12b landowners at this time. This area should be included as a greenfield priority area, but currently sits outside it on Map 1 of the LURP. The remainder of ODP12 development will not be able to occur efficiently without inclusion of this land.*

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:

*The Selwyn District Council must have clarity over its planning processes as a matter of urgency. This process is unsatisfactory for both Council's and landowners in ODP12b.*