

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

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

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Organisation*: Kennedys Bush Road Neighbourhood Association

*The organisation that this submission is made on behalf of

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Signature:

Date:

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

Comments

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

Yes subject to the comments made on the draft Land Use Recovery Plan by Kennedys Bush Road Neighbourhood Association (KBRNA) in April 2013 and in particular relation to the priority greenfield area R14.

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. KBRNA agrees.

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

KBRNA agrees.

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.

No Comment.

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?

Yes KBRNA believes the LURP does not adequately address the prioritisation of the greenfield areas by identifying all greenfield areas as "priority areas" . The LURP should clearly separate "priority areas" into those that are or can be serviced immediately from those priority areas where servicing will not be available until some time in the future. This will avoid sending mixed messages to both developers and the community as to when development is likely to occur and what processes are required to facilitate that development occurring.

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

KBRNA agrees with the conclusions reached.

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 LURP provisions continue to proceed on the assumption that all identifying greenfield areas are suitable for development and that any geo technical, flooding or servicing constraints can be satisfactorily mitigated or remedied. KBRNA consider that identification of TC3 equivalent land residential priority areas does not support the recovery of Christchurch especially when there are other greenfield areas available that have better underlying ground conditions, as such the identification of TC3 land as priority greenfield land is contrary to the recovery requirements of the CERA legislation.