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Dear Mayor Dalziel

Canterbury Regional Council views on the draft Cranford Regeneration Plan

1. Thank you for providing the draft Cranford Regeneration Plan (draft Plan) to Canterbury Regional Council (CRC) for comment.
2. CRC staff have worked productively with Christchurch City Council (CCC) staff and the other strategic partners to explore the development potential of the Cranford area. Our submission of views is provided with the intention of supporting CCC in producing a draft Plan for public comment that will better achieve the outcomes sought.
3. While in principal CRC supports the overall consolidated urban form enabled by the draft Plan, the expedited process to date under the Greater Christchurch Regeneration Act has not involved the same level and scrutiny of technical evidence as may normally be involved in a plan change process under the Resource Management Act 1991 (RMA).
4. As the local authority responsible for the Canterbury Regional Policy Statement (CRPS), it is important for CRC to satisfy itself that any proposals to amend the CRPS do not undermine its integrity, and that proposed amendments to the Christchurch District Plan (District Plan) give effect to the CRPS.

Managing risk from natural hazards

5. Regional councils and territorial authorities both have functions and duties under the Resource management Act (RMA) for managing risk from natural hazards.
6. The Canterbury Earthquakes Royal Commission report¹ provides guidance to local authorities on planning under the RMA for managing risk from natural hazards.

The report noted that:

- land use control for hazard mitigation is a shared function of the regional council and territorial authorities (page 4),
- a regional council ought to continue to have a role in land use control issues in terms of providing policy guidance (page 4), and

¹ *Management of Earthquake Risk by Canterbury Regional Council and Christchurch City Council - Obligations and Responses under RMA, November 2011*¹

- once land is zoned for a specific use it is very difficult for a council to refuse a subdivision that enables that use to establish. There is a presumption that land zoned will be suitable (page 12).

The report concluded that local authorities can exercise their risk management responsibility by factoring hazard risk into:

- urban growth and zoning decisions so that risk areas are not zoned for vulnerable or high capital value activities, and/or mitigation obligations such as engineering solutions are required, and
- subdivision consent determinations are such that development of high-risk areas is either not approved or subject to conditions on consent requiring risk mitigation

CRC's views

7. CRC understands that further detailed assessments will be undertaken of both Regeneration Areas A and B, to determine the extent of their suitability for residential development, and the mitigation required for areas that are found to be suitable.
8. CRC considers that land within the District Plan's Flood Ponding Management Area or High Flood Hazard Management Area, which is also subject to geotechnical hazards (settlement and liquefaction), should not be rezoned for residential purposes.
9. CRC would like to be assured that exacerbation of flood hazard in the Cranford area, including through the increased rate and volume of stormwater discharge created, and the potential for displacement of flood waters to other properties, is avoided. Increased volumes of stormwater would need to be accommodated by the stormwater basins, and discharges managed under the CCC comprehensive stormwater consent.
10. Attached to this letter is a schedule of suggested amendments to the draft Plan to better give effect to/implement the CRPS. This includes CRC's recommended amendments to the draft Plan's proposals for amending the CRPS and the Christchurch District Plan.
11. CRC recommends that the parts of Regeneration Area B that are within the District Plan's Flood Ponding Management Area or High Flood Hazard Management Area should retain their current Rural Urban Fringe zoning, and not be rezoned as Residential Suburban.
12. CRC also recommends the following changes to the proposed District Plan provisions to better ensure that appropriate assessments are undertaken and considered as part of any resource consent process:
 - The draft Cranford Regeneration Plan should be amended so that both Regeneration Areas A and B (excluding those parts noted above in paragraph 12 11) are included in the Greenfield Priority Area, and rezoned RNN. This would mean that all applications for subdivision consent in areas that are directed to be re-zoned residential through the Draft plan, would be subject to included in the East Papanui Outline Development Plan and they would all be considered as under restricted discretionary activities activity rule RD8 (unless otherwise classified higher in the District Plan due to other environmental reasons).
 - Restricted discretionary activity status, under RD8, for subdivision and land use consents for residential development in all areas proposed for residential use (unless otherwise classified higher). This is considered to be more appropriate than

having controlled activity status for some areas and restricted discretionary in others.

~~43.~~ 13. The views raised in paragraphs 7 to 12 are of considerable importance to the CRC, and the extent to which they are addressed in a revised version of the draft Plan will determine CRC's position on the draft Plan that is notified for public comment.

~~44.~~ 14. CRC would like to continue to work collaboratively with CCC. Our staff can assist in the provision and review of technical advice in relation to development of land for residential use within the draft Plan area. CRC considers that it should have a role in supporting and advising the CCC by providing technical information and expert advice applicable to the draft Plan area on:

- natural hazards and hazard risk
- groundwater and hydrology issues
- stormwater management

~~45.~~ 15 CRC councillors and our staff are happy to discuss the content of this submission of views with you and your staff. We will continue to work with you in a collaborative way to progress the draft Cranford Regeneration Plan.

Yours sincerely

David Bedford
Chair
Canterbury Regional Council

