

Preliminary draft

Land Use Recovery Plan

Consultation Report

(Round 2 Consultation April 2013)

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PREPARED BY Global Research



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Turning Information Into Insight



**Environment
Canterbury
Regional Council**
Kaunihera Taiao ki Waitaha

Working in partnership with



**Christchurch
City Council**
NZ TRANSPORT AGENCY
WAKA KOTAHĪ



**WAIMAKARIRI
DISTRICT COUNCIL**
Te Rūnanga o NGĀI TAHU



**Selwyn
DISTRICT COUNCIL**
CERA
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1. Executive Summary

- The Minister for Canterbury Earthquake Recovery has directed Canterbury Regional Council (CRC) (commonly referred to as ECAN) to prepare a Land Use Recovery Plan. This is to be done through a collaborative multi-agency partnership with Christchurch City Council, Selwyn District Council, Waimakariri District Council, Te Rununga o Ngai Tahu, New Zealand Transport Agency, and the Canterbury Earthquake Recovery Authority.
- Recovery involves the whole community, particularly business owners, developers and other investors to help rebuild and rejuvenate greater Christchurch, along with infrastructure, social facilities, recreation and other ancillary land use activities to support and create well-functioning, sustainable places and spaces, for residents and visitors to enjoy.
- Consultation was conducted with stakeholders and the general public from 21 March to 22 April 2013, in order to capture comment that will inform revision of the Preliminary Draft Land Use Recovery Plan (LURP) before a final version is presented to the Minister in June 2013.
- This report is a synthesis of the submissions made during consultation.
- In total 443 participants (submitting groups or individuals and workshop participants) commented on the draft Plan: 119 people attended stakeholder workshops; 132 attended public workshops; 148 provided letter or form submissions and 64 completed an online survey.
- The 443 submissions was similar or higher than other significant Plans being consulted on in Christchurch over the last 18 months. For example:
 - The Christchurch City Council Three Year Plan 2013-16 (Draft) received 373 submissions. The Three Year Plan was consulted on over a similar time period to the LURP
 - CERA's draft Recovery Strategy for Greater Christchurch (October 2011) was commented on by 463 respondents
 - CERA's consultation on the Draft Recovery Plan for the CBD (January 2012) was commented on by 82 respondents.
- While consultation initiatives may have yielded greater participation in pre-earthquake times, for example 1800 made written comment on the Urban Development Strategy (UDS) (2005), there are currently a significant number of post-earthquake processes and Plans being prepared which are calling for public comment. Also, there has now been an extended period of post-earthquake planning and consultation, and that combined with individuals' personal earthquake circumstances is likely to be contributing to participant fatigue.

- A higher response may have yielded finer detailed comment on individual LURP Priorities and Responses. However, significant consistent themes still emerged, which incidentally were consistent with other similar planning processes, in particular the UDS (2005). A table of consistent themes is presented below this section. A significant number of comments expressed the need to:
 - Ensure that there are quality outcomes for post-earthquake communities within greater Christchurch
 - Be proactive in increasing housing within existing urban areas, and balance greenfield development with minimising urban sprawl which will lead to transport and other infrastructure inefficiencies, costs and environmental impacts
 - Have a clear land-use plan for the recovery
 - While some stated that they wanted decision making speed others stated that there should be more input into democratic processes.

- The importance of strong public participation in the LURP development process was mentioned by some participants, and this is also the intention of the LURP planning team. The Workshops were advertised through normal media channels, the Developing Choices website was created, and as many participants as possible were encouraged to attend. There were no restrictions placed on people by having to book places or complete other similar pre-workshop administration tasks. Attendance was made as simple as possible and within the short timeframe available a number of day and evening times were available for people to attend, particularly in Christchurch (one evening session was held in both Selwyn and Waimakariri Districts). The two hour workshop time length may have put some off attending, but the nature and size of the Plan made this amount of time necessary for it to be possible to collect useful information from informed participants.

- Those who participated in workshops engaged with the process and provided valuable comment to improve the Preliminary Draft Plan. Comments were provided across all areas of the Plan, but mainly focused on specific Priorities and Responses, and were largely focused on residential rather than business issues. The focus on Priorities and Responses was a result of the framework of the workshops which aimed to get specific feedback on these Plan areas. However, participants were able to make comment on all Plan areas, and *other* comments were captured and included within the analysis of comments.

- The online surveys were structured to be consistent with the workshops in order to again capture comments on the Priorities and Responses of the Plan. The comments collected through the online survey were generally more detailed than the individual comments collected in the workshops.

- The letter and form submissions were generally long and some included attachments. The difference between these submissions and the workshop and online submissions was that many of these were focused on individual issues that the submitter had particular interest in, such as a particular plan change on land that they had an interest in. Also though, there were wide sweeping submissions which covered all Plan aspects, in particular from groups and government agencies.

- The table below presents the most commonly discussed themes that emerged from submissions across all Preliminary Draft Plan areas.

Common submission themes across the Preliminary Draft Plan

<p>1. Balancing development with quality community outcomes, and balancing timeliness with good decision making</p>	<ul style="list-style-type: none"> ▪ While it was accepted that new areas will be developed for rebuilding, this was consistently tempered with ensuring that planning decisions are consistent with maintaining personal and community health and the natural environment. There was also support for avoiding natural hazards, including within existing urban areas. Development of communities, urban villages, and the provision of community facilities, within residential areas was encouraged. ▪ The development of local centres, as well as the Key Activity Centre (KAC) network, was also desired. More detail was wanted on the function and extent of KACs. ▪ While the need for timely progress of the recovery was the desire of many respondents, this was balanced by those who identified the need for good decision making processes to be followed, to ensure that planning decisions result in good outcomes and quality of life for individuals and communities. The timing and speed of preparing the LURP was raised.
<p>2. Ensure quality democratic planning into the future</p>	<ul style="list-style-type: none"> ▪ There was a desire for subsequent planning processes that the LURP triggers to include appropriate public input from local communities.
<p>3. Diversity of housing choice and transport modes</p>	<ul style="list-style-type: none"> ▪ Different housing styles and sizes and mixes of activities were desired. This included social and affordable housing across the city. Mixed housing types throughout existing urban areas and greenfield subdivisions was desired, rather than just large family homes, which was identified as the current status quo in new areas. Innovative design was suggested as a means to maintain quality outcomes. ▪ Mixed modes of transport, including provision for a full range of biking walking and public and commuter travel, and not just cars, was frequently suggested.
<p>4. Housing supply, density and sprawl</p>	<ul style="list-style-type: none"> ▪ Increasing housing supply was supported. However, there was concern about the emphasis on greenfield development. Increasing housing supply by increasing residential densities within the existing urban area and around centres, rather than greenfield sprawl, was supported. A more proactive approach and strong leadership was suggested by some. Submitters generally stated that increasing density should be accompanied by quality urban design. Urban sprawl was seen to be associated with additional cost in the form of infrastructure costs and environmental impacts that will increase over time, especially as fuel costs increase, making travel more expensive.
<p>5. A clear recovery plan</p>	<ul style="list-style-type: none"> ▪ There was support for a clear land use plan to be in place to support recovery.
<p>6. Land use and infrastructure relationship</p>	<ul style="list-style-type: none"> ▪ Land use planning and infrastructure (transport and horizontal services) planning needs to be considered as a whole. For example, residential growth away from centres and in greenfield areas can have a significant impact on future transport, other infrastructure and environmental costs, and costs need to be considered collectively, not separately.
<p>7. Planned infrastructure replacement</p>	<ul style="list-style-type: none"> ▪ Efficient and quality outcomes were desired from infrastructure rebuilding, through proactively identifying and taking opportunities to do things better through coordination and collaboration.
<p>8. Unique post-earthquake situation</p>	<ul style="list-style-type: none"> ▪ Unique needs of the community in post-earthquake times were discussed by many submitters. The impact of the movement of displaced red-zone residents on themselves and the outcomes of relocation was one example. Mass relocation of businesses and residents and subsequent transport pattern changes was another. ▪ In response to the need for information on significant topics, such as geotechnical and population numbers, submitters wanted up to date and open access to information.
<p>9. Sustainability opportunity</p>	<ul style="list-style-type: none"> ▪ Deliberately planning to reduce the impacts of environmental change that will occur as a consequence of climate change and sea level rise was seen as an opportunity to rebuild a sustainable future, which should be taken by the LURP. Specifically for the current rebuilding situation, not rebuilding on unsuitable land was stressed. Sustainability within new building (solar, rain water capture, insulation) was suggested and some saw the need to regulate for this outcome and not just promote it.
<p>10. Residential more commonly discussed than business issues</p>	<ul style="list-style-type: none"> ▪ Across all submissions there was far more comment on residential issues than business issues. Business issues were often discussed in the context of infrastructure implications, rather than, for example, things that will promote greater business activity or impact negatively on business development. ▪ Reviewing development contributions was commonly discussed with regard to land development.

2. Introduction

OVERVIEW

The Minister for Canterbury Earthquake Recovery directed Canterbury Regional Council (CRC) (commonly referred to as ECAN) to prepare a Land Use Recovery Plan on 15 November 2012. This is to be done through a collaborative multi-agency partnership with Christchurch City Council, Selwyn District Council, Waimakariri District Council, Te Rununga o Ngai Tahu, New Zealand Transport Agency, and the Canterbury Earthquake Recovery Authority.

The Minister's direction states that CRC must ensure the draft Recover Plan reflects to the extent possible the views of greater Christchurch communities generally, and must use targeted stakeholder sessions (among other requirements) and must prepare and publish a report on all consultation undertaken, including a summary of what was heard during consultation and how it influenced the draft Recovery Plan.

To date two consultation Rounds have been completed. The first Round was held prior to Christmas 2012 and included a series of targeted stakeholder workshops. A previous report has been prepared which presents the findings from those workshops.

This Report presents a synthesis of the comments received from the Second Round of consultation. Consultation enabled submitters to respond to the Preliminary Draft Land Use Recovery Plan - Te Mahere Whakahaumanu Tāone. The consultation period lasted from 21 March to 22 April 2013.

Three comment and submission capture mechanisms were used:

- 14 two hour workshops
 - Six stakeholder workshops with invited participants (26 March – 4 April)
 - Seven public workshops with the general public in Selwyn (1); Waimakariri (1) and Christchurch (5)
 - One Impact Assessment Workshop (16 April)
- Online survey
- Letter and form submissions

WORKSHOP FORMAT

All the workshops, except for the Impact Assessment Workshop, followed a similar format. A 40 minute presentation was provided by a LURP planning team representative. This was followed by a 10 minute open discussion of key issues. The questions and comments asked across all of the workshops are included at the end of this report. Full text of each workshop discussion is provided in the Annex document which accompanies this Report.

The second stage of each workshop invited respondents to take *like*, *dislike* and *do differently* post it notes, make comments on them and post them on the relevant Priority and Response poster located around the workshop room. This exercise took around 20 minutes. The exercise was designed to capture individuals' attitudes to and



comments on particular Responses. It was also a way for participants to share their ideas, with all having the opportunity to read each other's comments.

Participants were then asked to go to one of three tables – *land use; housing or business*. At the tables respondents engaged in a facilitated discussion that was recorded on sheets structure by the Priorities and Responses. This activity provided groups the opportunity to develop thoughts on each topic and build on ideas. A participant scribe recorded the comments, suggestions and ideas. The groups were facilitated by one of the LURP planning team, who heard ideas first hand and was able to answer questions. Participants could move at any time to one of the other two tables and were also able to have conversations with other workshop participants and LURP representatives away from the tables. This exercise generally lasted about 45 minutes.



The final exercise was a wrap up that included respondents being given three post it notes to identify their three top priorities (in need of most immediate action) from all of the Priorities and Responses. The results of this exercise are presented in the chart below. The most commonly selected *Response* was:

- *R18 SD: Provide proposed Greenfield land-zoning provisions to the CER Minister in a manner that is aligned with provision of core public and private infrastructure and services...*

The next two most commonly selected responses were

- *R1 SD: New chapter in CRPS with provisions enabling rebuild and redevelopment including priority areas. This will achieve an efficient, sustainable, functional and desirable Greater Christchurch... and*
- *R11. Ensure rebuilt transport network in and between centres provides for a variety of modes (including walking, cycling, public transport and rail)...*

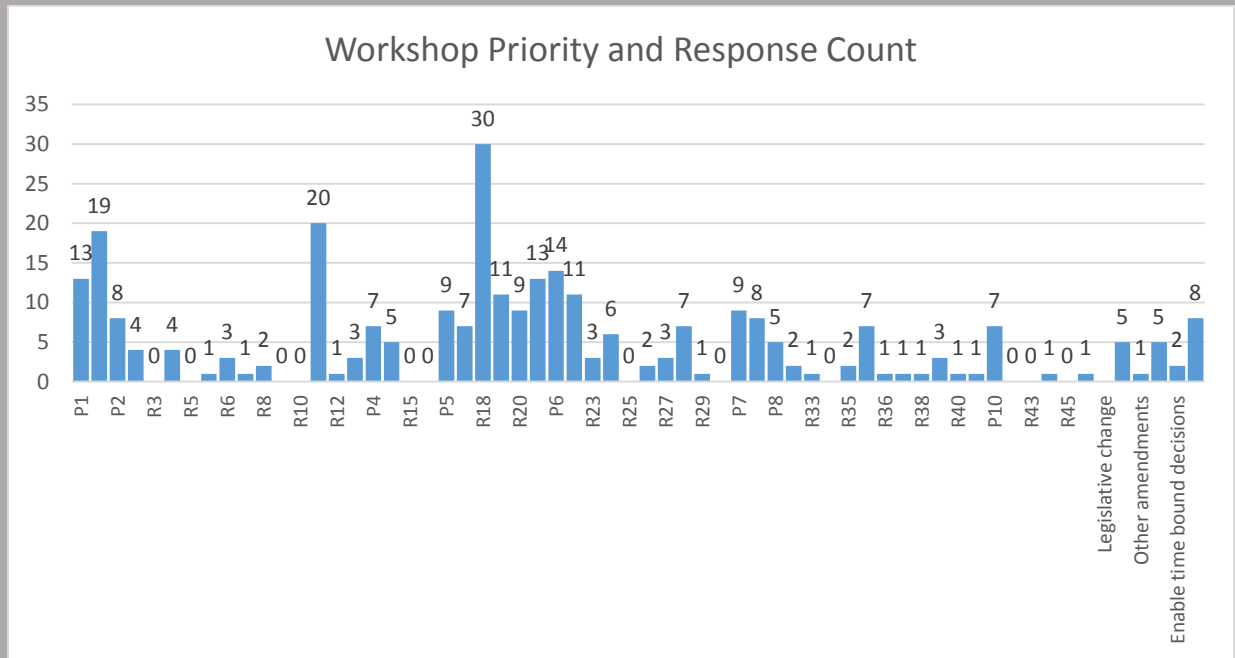
Overall, *housing* priorities were frequently selected, particularly the Priority and Responses under:

- Priority 5: Increase housing supply to meet demand



WORKSHOP EXERCISE RESULT: PRIORITIES IDENTIFIED BY PARTICIPANTS

Workshop participants were each provided three post it notes at the end of each workshop to paste on the Priority or Response that they thought should be given priority in terms of timing or significance. The chart below represents a count of where post it notes were placed on Priorities and Responses.



Participants were also invited to provide further comment after the workshops by either completing a paper submission, or via an on-line survey.

The facilitator followed the same general process for each of the sessions but adapted the approach slightly for each workshop depending on numbers and group makeup to ensure as much information as possible was gained from particular workshops. In sessions with a smaller number of participants or with a group interested in a similar issue the table exercise was not used and an extended group discussion took place.

At all sessions all comments made in an open forum were transcribed and included in the analysis.

In total 119 individuals attended the stakeholder workshops and 132 attended the public workshops.

ONLINE SURVEY

An online survey was available for the entire consultation period. The survey was structured by the three Plan areas: land use framework, housing and business. The survey could be accessed via the Developing Choices website (www.developingchoices.org.nz). Submitters could select the particular Priorities and Response that they wished to answer on in the survey. They were also asked to indicate if their comment was generally a *like*, *dislike* or *do differently* comment.

In total, 64 people made comment via the online survey.

LETTER AND FORM SUBMISSIONS

One hundred and forty eight letter or written form submissions were received (134 letter style and 14 form submissions). These were from individuals, businesses, affected landowners and government agencies. The letter submissions ranged in size from a few sentences to tens of pages with attachments containing detailed drawings and supporting documents in the form of professional advice, or support from other parties. The submitter structured their submission however they wished; all were accepted and considered. The form submissions used a template prepared by the LURP team, available from the Developing Choices website.

INFORMATION SYNTHESIS PROCESS AND REPORT WRITING

The overall aim of this report is to make the information captured from all formats easily accessible to the team preparing the Land Use Recovery Plan and all interested parties.

To complete this task all information submitted in the various forms has been entered into specialist qualitative (text) analysis software and organised under the Priorities and Responses of the Plan, as well as the *other* sections of the plan mainly discussed in the *Other plan sections: Key legislative changes; Regional Policy Statement; CCC, SDC and WDC Plan changes* section. As a result, the comments from the workshops, online survey and letter and form submissions covering the same topics have been combined and synthesised.

Topics that emerged under each Priority and Response are discussed in this report, with an indication of the amount of support or disagreement, and why, with each Priority or Response. Suggestions for doing things differently are also presented. The analysed information has predominantly been structured by the way that it was captured – so comments placed under a particular Response in a workshop were normally analysed under that Response. However, when it was obvious that a comment should be included in a different place it was moved to that more appropriate place. This was most commonly exercised by moving *other* comments to like or dislike categories.

The analysis team has been impartial in presenting this information. Where possible it is stated whether an idea or opinion has been expressed by single or multiple respondents. Where an opinion is expressed in the text, it is not the opinion of the report writing team, it is the opinion of one or multiple stakeholders.

In parallel to preparing this report, LURP planners have also read the individual Letter and form Submissions in full. Submissions from all formats (including attachments) were considered in the drafting of appropriate amendments to the LURP.

Throughout this Report the number of submitters making similar comment is indicated as follows. This is so relative weighting of comments is consistently presented throughout.

- **'one' = one submitter**
- **'two' = two submitters**
- **'a few' = three to four submitters**
- **'a number of' = five to nine submitters**
- **'many' = ten or more submitters**

The indented italicised text throughout is a direct quote from a Submitter.

Each Priority and Response states the number of comments that were made on it in brackets next to its title throughout the report.

Note that the titles of the Priority and Response sections truncate the titles in the Plan for readability, because some of the original titles in the Plan are relatively long.

3. Priority and response discussion

Priority 1: Provide for a clear, co-ordinated land-use plan for the recovery of greater Christchurch (78)

OVERALL PRIORITY SUMMARY

- Comments made under this *Priority* and the associated *Response* were relatively broad. A few submitters supported the Priority itself and many supported Response 1.
- The majority of comments were suggestions for doing things differently. There was a lot of variety in the suggestions, although some consistent themes were clarifying aspects of KACs; and quality of urban design and subsequent living outcomes.
- A number of submitters commented on needing to minimise urban sprawl and to have greater consideration for environmental protection, both in general, as well as other more specific environmental considerations presented in this section.

LIKED ASPECTS

A few submitters provided general support for this Priority.

Individual comments made by submitters included that the new chapter will enable rebuilding and redevelopment and that this priority is essential to provide certainty.

DISLIKED ASPECTS

Very few submitters stated dislike for this Priority. Individual comments were made on: the need for consideration of residential development in East Maddison Road; that this work has already been done through the UDS process; the emphasis on housing and business but not on social or cultural; that the focus is too short term meaning the issue of sea level rise is not considered; lack of flexibility in the plan; and the inefficient integration of transport with the Christchurch Central City Recovery Plan.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters commented on the need to ensure that urban sprawl is limited and that this can be controlled by increasing urban densities through brownfield development. They would like to see urban limits put in place or targets for greenfield/brownfield development. A few submitters also commented that protection of the environment should be given greater priority.

Two submitters commented that consideration needs to be given to the development of rural residential land, particularly in areas where rezoning should be sped up or is in high demand.

One-off topics raised in submissions were: the need for ECAN to take the strategic lead with TAs to follow; a separate section to give clear priority to KACs is needed in the Plan; the need for more detail around the identified priority areas; further consideration for rural residential development in Selwyn; a longer term vision; change naming of priority (development) areas to avoid confusion; support for transitional projects; concern about the lack of appeal opportunities; using red zone land for community gardens; the provision of churches and

community centres; concern about a 'one size fits all' plan; the use of people per hectare instead of the household concept; needs to be clear that developers can negotiate with council regarding infrastructure provision; and the importance of involvement with Tangata Whenua.

One submitter suggested inserting a new bullet point 3 as

The strengthening and establishment of interconnected neighbourhood villages with a high level of readily accessible local amenity that contributes to a unique sense of place and belonging.

The Canterbury District Health Board made these suggestions related to productive land.

The Land Use Recovery Plan must ensure that the productive land around the urban fringes is protected. There is a risk that high quality agricultural land may be lost to low density urban expansion, this could reduce local food production, thereby increasing costs to the consumer, potentially leading to food insecurity for vulnerable people. Access to fresh, healthy food is critical for people to maintain healthy lifestyles and prevent the development of diet-related chronic diseases such as diabetes or obesity. Plans should recognise that access to healthy, sustainable and equitable food is an essential part of achieving liveable communities.

Recommendation: *that an additional response is added to the Plan which protects agricultural operations and land now in use or deemed suitable for future agricultural production. Recommendation: That any explanation given in plan change documents around peripheral urban growth highlight the importance of the protection of productive land.*

Recommendation: *that CDHB are invited to contribute expertise into the development of a new response around Productive Land. Community and Public Health has a lot of background research into the field of food security. Please contact us if you would like assistance on creating this new response.*

The National Council of Women also made this comment relating to public space suggestions

While this plan identifies large amounts of space for "development," it needs to take into account the accessibility and availability of public spaces. A concern is that new developments (and existing developments, for that matter) will not have adequate community centers which are suitable as meeting places for community groups, scouts, toy libraries, etc. Council needs to work with developers to identify adequate community spaces, essential for the health of the community.

OTHER COMMENTS

A few submitters commented on the need for the RMA and LGA to be reformed before the LURP Plan can be successful.

Response 1. SD: New chapter in CRPS with provisions enabling rebuild and redevelopment including priority areas. This will achieve an efficient, sustainable, functional and desirable Greater Christchurch (167)

LIKED ASPECTS

Many submitters liked that by inserting a new chapter in the CRPS it would provide a clear and coordinated land use plan for greater Christchurch. Submitters commented that this would ensure council directives are followed and allow for progress to take place as fast as possible and with greater certainty, particularly in priority areas.

because it ensures that Council's ensures this direction/directive is followed

A few submitters liked the bullet points one and two made under R1, particularly in relation to the need for a mix of activities, both within residential areas and around the network of KACs. There were also a few submitters that liked the inclusion of urban design matters.

There were two submitters who liked that the chapter to be inserted is aligned well with the existing planning network, in particular that it is consistent with the Selwyn and Waimakariri District Plans.

Specific support for the inclusion of housing options on MR 873 was made by two submitters.

Other comments made were that individual submitters liked: bullet point three; consideration of key constraints; reducing urban sprawl and that it would achieve a workable result.

DISLIKED ASPECTS

The main discussion was around aspects that weren't mentioned under R1, these were: environmental related aspects, inclusion of West Melton businesses, integrating future use of red zone land, reference to MR 875; airport noise contour; areas where retreat from existing development should occur; land use suitability; taking into account carbon emissions; the future of land currently in court facing land decisions; a lack of focus on liveability and housing options for MR 873.

by omission there is no mention of environmental issues and how we are going to protect valuable environmental areas and historic buildings

A few submitters commented that the approach is too prescriptive, one in reference to minimum densities being too high, and one commented that it should not be a Statutory Direction.

Although not directly related to this Response, a number of submitters commented in this Response on the need to include specific areas of development around Rolleston, particularly related to East Maddison Road.

SUGGESTION FOR DOING THINGS DIFFERENTLY

A number of submitters commented on the need to include environmental considerations more specifically in R1. This included: natural hazards, flood risks, stormwater management, water quality, ecosystem health, groundwater springs, biodiversity, local food production/slowing development of high quality arable land, outdoor recreation and mahinga kai restoration. A few submitters also commented on the need to include considerations surrounding community facilities.

please put in specific areas around protecting wetlands, other areas of environmental importance and working on the natural corridors that have been started

Identify the public and the open spaces that can enhance value of residential areas

Two submitters commented on the need for further discussion surrounding noise contours before it is included under bullet point 4. Another two submitters commented on the need to deal with out of scope areas.

Individual comments were made in submissions on aspects that they thought should be included, these aspects were: more guidance on urban design; expand focus outside identified KACs; the ratio of greenfield to brownfield development; a rural residential strategy; a hierarchy of shopping precincts; rural development to occur only in areas close to towns and motorways; defining conditions under which priority areas and KACs are identified; long term provision for transitional projects; and a review of residential densities.

Additional individual comments from submitters were that: this response should be deleted entirely, moves should be taken to slow the development of high quality arable land; similarities with Auckland should be considered; overall planning processes should be investigated and the ODP policy is too detailed.

A large submission came in relevant to this section from Peter Stokes related to transport standards and how they are implemented by the CCC, and in particular that standards should be policed better.

OTHER COMMENTS

A few submitters considered that additional focus on brownfield development, minimising urban sprawl and ensuring certainty into the future should be priorities.

Other concerns that were raised by individual submitters under this section included the need to consider: incorporating NERP contents; linking the LURP Plan to other plans; the specific translation of objectives and policies; the amount of detail in the RPS and plan changes; policy provision post 2028; shift of households from East to West; peak oil; the importance of intensification; urban sprawl; limits on rural residential development; strengthening communities; a summary of the differences between the new chapter and PC1; and aligning the LURP Plan in accordance with current rezoning applications.

Priority 2: Support, facilitate and enable recovery and rebuilding activities (33)

OVERALL PRIORITY SUMMARY

- The proposed independent review of Regional and District Plans and consenting processes in Response 4 attracted many comments.
 - Many submitters felt that this would take power away from Christchurch residents and they would have less influence on change.
 - Submitters who thought this was a good idea suggested it will speed up the development process and lower costs. There was also some concern that this would not happen (development wouldn't happen).
- There were many comments across the priority and responses on barriers to development. Some submissions saw the Councils as barriers, cost was mentioned a number of times, as well as decision making and consenting processes and bureaucratic regulations.
- There were many comments across the Priority and Responses which supported intervention with Councils predominantly to speed up processes.

LIKED ASPECTS

One submitter commented that this priority is generally good but needs more detail, the submitter also commented that there needs to be care taken with trying to introduce RMA changes without consultation processes, such as an independent review.

Another submitter stated that they support the government intervening and amending the RMA to make it easier for small businesses and land owners to participate fairly in the process. Similarly, another submitter agreed with the fast tracked consenting process.

DISLIKED ASPECTS

One submitter commented that the CCC consulting process was holding up recovery and an independent overview is needed.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Two submitters commented on recreation. One suggested swapping land in the East for sports fields on red zoned land, another suggested identifying potential for recreational networks in lifestyle areas. One submitter stated that it was unclear what Response 2 proposes. Another submitter commented that professionals should be used to give life to community wishes. One submission stated that the independent review was very important.

OTHER COMMENTS

There were a number of issues raised by individual submissions in this section. One submitter commented that plans and processes need to be sped up to enable recovery, and that all three councils need to implement what is proposed for RPS changes. Another submitter expressed concern that speeding up the consenting process may lead to less checks and regulations which will affect sustainability of developments.

Other one off comments were also made in this section, included using the Avon for an international rowing facility; that big business owners should not override the rights of individuals or property owners; not supporting Greenfield developments due to the future rise in oil prices; need for an urban limit to prevent urban sprawl; a concern about rent prices in the CBD - this submitter suggested that high rent will ward off young people and

potentially leave the CBD less lively, to avoid this the submitter suggested stipulating an area offering only short term rent for high turnover to keep rental prices down.

Response 2. CERA undertake facilitation and intervention to overcome market barriers to development including collective solutions for comprehensive redevelopment... (66)

LIKED ASPECTS

A few submitters commented on supporting intervention and collaborative solutions with the Council. Two submitters agreed that they support intervention to overcome barriers to development.

Because that would help people to understand issues better, discuss ideas that are put forward, discuss potential problems and find workable solutions collectively and to be part of the process.

A few submitters expressed the desire to speed up building. One submitter commented that there should be more flexibility in terms of the kind of community facilities neighbourhoods should have.

DISLIKED ASPECTS

There were a number of comments made in this section. Some were unsure how it would work and thought it was too vague wish in the end would be in favour of larger developers and to the detriment of small land owners and the environment.

it is unclear what mechanisms would be used to do this and how the sustainability and public good issues will be addressed

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The most common theme discussed in this section was to do with intervention. One submitter specifically wrote that CERA and the government should intervene with Selwyn District Council activities. Other submitters also commented on barriers to development, with one submitter commenting that land owners and developers are being inactive in terms of building or developing land, the issue of land banking was also raised by this submitter who used it as another example of a barrier. One comment suggested that rebuilding should be a collaboration with existing land owners.

A few submitters commented on R2 being unclear, or worded too generally to understand.

It is unclear exactly what response 2 proposes, specifically what mechanisms CERA would be using to facilitate and intervene in addition to the other related responses (such as responses 21 and 26).

The inflexibility (for example not being able to build community facilities in residential areas) and the need for permission to develop community spaces in residential areas was another topic raised in this section.

OTHER COMMENTS

One submitter in this section commented that all housing developments should be in accordance with design values that promote health and sustainability. Another comment was in response to the importance of enabling different kinds of transport in suburban areas, like walking, cycling and driving. One submitter commented that they supported an intervention in response to the development in the East in Brownfields. That submitter also commented that the development may not be profitable or attractive without intervention. Another submitter commented on the need to prioritise more intensive CBD development.

Response 3 T.A's to co-ordinate and integrate existing advice and information services for rebuild activities... (52)

LIKED ASPECTS

A few submitters commented that streamlining the consenting processes was important to speed up development. A few submitters also commented on the importance of information for the public that is easy to obtain and understandable.

Good idea, collective information will save money and ensures that there is an overall consistent understanding of an issue or advice given.

One submitter mentioned that information being shared between parties will save time and money and another commented that information for homeowners who are rebuilding should be more easily accessible and consenting and access should be easier.

DISLIKED ASPECTS

In this section, one submitter commented that the Selwyn District Council (SDC) gets in the way of development in the district, a similar comment from another submitter was that councils should act as nothing more than an affordable 'clearing houses'.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Suggestions were varied in this section. One submitter commented that there needs to be support, community leadership and engagement with local populations to take into consideration their values for the rebuilding of their neighbourhoods. Another submitter commented that there needs to be consistency between TA's on how everything mentioned in this section will be carried out. One submitter commented to stop TA's owning land in competition with ratepayers. Another commented that not all properties in Rolleston need a geo-tech report.

OTHER COMMENTS

One submitter commented that decisions cannot be left to TA staff and developers when it comes to key infrastructure for the public. The submitter also raised the importance of the District Plans to require safe and sustainable transport as mandatory.

Response 4. Undertake independent review of provisions in Regional and District Plans and related planning and consenting processes relevant to earthquake recovery... (69)

LIKED ASPECTS

Most of the submitters in this section agreed with and supported reduced consent and notification requirements, and reducing approval timeframes and costs. One submitter commented that the result of streamlining the consenting process and reducing approval timeframes would contribute to increasing housing supply as it would be easier and faster to build.

A number of single comments responded to the independent review, one submitter commented that it was a good idea depending on who was appointed and providing it remained open and democratic. Another submitter commented that there needs to be a faster response to develop Greenfield land.

DISLIKED ASPECTS

A few submitter's commented that there would be a reduction of Christchurch residents' and Councillors' input as a result of implementing the Independent Review. One submitter commented that it would shift decision making

to Wellington. Another submitter stated that the independent review gives residents less opportunity to influence change.

Two submitters brought up the environmental impacts and how this response is putting development ahead of the environment. One comment discussed the possibility for future development, if the processes are reduced, may lead to system abuse and corruption. One submitter also commented that they disagree with fast-tracking developments in greenfield areas and an example of the fast-tracking development in Bexley was used as an example to show why they believed this was a bad idea.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of issues were commented on by individual submitters in this section. These comments were concerned with residents of Christchurch having less involvement in redevelopment due to the proposed independent review, and requested those carrying out the review to consult directly with the communities. One submitter stated that the independent review should be undertaken by professionals from outside Christchurch to ensure full independence, and another commented that the review should not be a council process.

One submitter commented that there needs to be more flexibility in the way councils approach design and capability of land to support development.

One submitter suggested that the government interfere in Regional and District planning processes and another suggested simplifying some RMA processes.

OTHER COMMENTS

There were a few comments made opposing tolerance to houses being rebuilt for recovery in flood management areas. There were concerns about health and wellbeing of those living in these areas. Another comment raised the issue of existing development in flood management areas where there is risk spread beyond their boundaries. Another submitter also commented that the rise in sea level needs to be considered, along with the impacts of coastal erosion. One comment raised the question of at what point should areas, subject to flood risk, avoid development/redevelopment. Another submission also questioned how to manage the retreat from existing areas which ought to be discontinued for residential use. That submitter claimed that the plan fails to address the reality that houses repaired, rather than rebuilt will not be at the required height (above sea level) which leaves them exposed to flood risks.

One comment stated the current development process, using council staff, was too costly and fraught with difficulty for developers. A number of single comments responded to aspects of the plan such as the independent review taking away the voice of residents; endorsing a speeding up of the redevelopment and concerns over control requirements being waived.

Response 5. SD: Provide proposed regional and District plan changes as a result of the independent review in R4, to CER Minister (36)

LIKED ASPECTS

There were a number of differing responses to this section. One submitter agreed with the idea but mentioned that there needs to be consultation with development communities. One submitter commented that Christchurch's future should be in the hands of democratically elected people's representatives. One submitter agreed with this response as it will increase housing supply and affordability. One submitter commented that this was important, if limited funding is going to be allocated to the large number of initiatives recommended in the LURP.

DISLIKED ASPECTS

There were a number of single issue comments, one of the comments disagreed with the idea of an independent review as it makes it harder for residents in Christchurch to be involved. Another submitter commented that they did not like no further development in Rolleston through the LURP. Another submitter commented that it was undemocratic for CERA to override Regional and District Plans.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested that Environment Canterbury must direct TA's as LURP will be unsuccessful if it is not managed well. Another submitter commented that there should be more public consultation.

The all of Government submission included this comment.

R5 It is not clear whether the Statutory Direction also enables changes to council processes, as well as plans, as both are important. It is also important there is alignment between each council's processes. We seek inclusion after 'District Plan changes' the following words "and significant council process improvements"

OTHER COMMENTS

Other comments in this section included one submitter commenting about the need to amend district plans to make safety and sustainability requirements compulsory, and one that all areas to be rezoned should be rezoned; two submitters in this section commented on barriers to development; another submitter commented that money and cost were barriers; and another commented that disagreements and the decision process are barriers.

Priority 3: Establish land use development priorities that ensure an efficient use of resources for the planning and delivery of core infrastructure and services (35)

OVERALL PRIORITY SUMMARY

- Overall there was strong support for this priority and its responses. Comments were predominantly around transport, with particular support for non-car transport modes, especially public and active (walking and cycling) transport.
- There were many comments across the Priority and Responses in relation to urban sprawl and often its implications for transport: fuel/oil costs; greater cost and congestion; creates future transport limitations; is detrimental to public transport. There were a few comments that intensification and development around existing areas was preferred.
- Similarly, there were many comments on utilising, maximising, prioritising and better provision of resources to maintain existing assets and infrastructure. A number of these comments were made under Response 8, but also across the Priority and Response 7 and 8.

LIKED ASPECTS

For the Responses 6-13 under this Priority a number of submissions provided by McCracken and Associates on behalf of different clients made this statement.

Support the need to prioritise land development to enable the efficient provision of infrastructure but greater emphasis on opportunity should be taken to consider public/private partnerships in all elements of infrastructure provision.

DISLIKED ASPECTS

There were two comments in this section. One submitter commented that the Plan could lead to urban sprawl, does not adequately cater for integrated transport planning, focusses on property developers and that in the future we would be living beyond our energy needs. Another submitter disliked the lack of detail on building with resilience in relation to infrastructure.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters stated that the LURP needs to promote walking and cycling around communities.

A much greater investment in public transport and initiatives such as travel plans would encourage a more compact city.

It was stated that Councils need to lead development into existing areas rather than developing new areas and that we should be planning for future sustainability. Two submitters would like to see existing infrastructure utilised in relation to future development over building new. A comment was made that there are already provisions available within CCC's city plan to promote transport integration but they aren't being used. Similarly another submitter stated that powers should better used to reduce sprawl. With regard to CCC this was stated:

Transport integration, including with different modes of transport, has been dangerously disregarded in newly consented decisions where cycle lanes to come to dead ends on cycle routes requiring cyclists to merge with buses, cars and heavy commercial vehicles. Non-complying narrow main road widths result in public transport, freight and private vehicles needing to yield behind cyclists (until there is room to cross the centre line to pass), and to

queue in the traffic lane behind right turning vehicles due to elimination of the required centre turning median. Cyclists will need to yield behind vehicles stuck behind right turning traffic or attempt to squeeze between the congested traffic and parked vehicles.

One comment was made that it would be better to allow small areas of large blocks to be broken into smaller sections, leaving the vast majority of a block undivided and still available for farming. This was suggested as a better option than having a larger number of medium sized blocks that because of their size are economically unproductive for farming.

A few submitters made suggestions about: flexible infrastructure development to ensure cost efficiency; public transport should be prioritised ahead of cars and all parties should work together in regard to timing and sequencing. There was a discussion in Workshop One relating to the need for sequencing of infrastructure, and the possibility of private developers funding, with the developer being recompensed with interest at a later date by Councils when the time of the scheduled infrastructure development is reached.

The all of government response stated:

A clear sense of local and regional priorities is essential for ensuring that the directions set in the LURP can be supported within the funding available. It is important to manage the development of new infrastructure flexibly to respond to changing population patterns, to avoid the risk of overinvesting in the wrong places. We support allowing some developments to proceed with lower levels of service in the short term, until demand is proven.

A few other suggestions were also made: incorporate community amenity in this Priority; make Council ODPs take priority over private plan changes; and another commented that Christchurch priorities are different to central government, stating that (Christchurch) does not prioritise a convention centre and covered stadium as highly as they are prioritised in Wellington.

OTHER COMMENTS

A number of comments were submitted in regard to Priority 3, largely related to transport, land use and housing and the interconnectedness of them all. The general premise of these comments was that urban sprawl leads to greater cost and congestion as people living further out have higher infrastructure costs, and the transport provision needed to get people in and out of the city is inefficient and expensive, leading to congestion and cost. A number of submitters commented on the importance of public transport, cycling and walking.

Reponses 6. SD: Provide CER Minister with required amendments to CRLTP, Annual Plans, Three Year Plans, and LTPs to ensure alignment of infrastructure funding... (53)

LIKED ASPECTS

Overall submissions supported three main areas for Response 6: acknowledgement of transport programme, prioritising land development, and prioritising areas most important for funding. A few submitters supported public-private partnerships in infrastructure provision.

A few submitters stated that development that can be easily serviced in existing areas should be given priority. Also that CER powers should be used to ensure good outcomes are achieved. This comment summed up a number of submissions:

Infrastructure and services are essential to support the delivery of housing in Priority Areas. We support the direction to amend statutory plans, as required, to remove any impediment to land development.

DISLIKED ASPECTS

A few submitters commented on the area included in the LURP and would like it broadened. For example:

Greenfield priority areas in Rolleston are too restrictive. The Council has already decided to develop infrastructure in these areas well before the LURP process. Nothing has changed for the SDC or will change by this process. Decisions have already been made.

Three submitters thought the response unnecessary, one sighting cost implications. Two submitters were concerned with what the priorities were and who determined them. One submitter disliked rail not being included in the long-term transport plan. One submitter disliked streamlining resource consent processes because they believe that hasty planning can lead to bad outcomes.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters suggested changes, two of which supported changing planning and consultation approaches as they think they are in favour of large land owners and lawyers. A couple of other comments stated that local government should have more ownership in this process with CER playing less of a role, which would lead to better consultation outcomes.

A number of submitters commented on transport issues and that a coordinated region wide response incorporating central government powers in collaboration with local government was needed. This was one comment:

Utilise existing networks in the first instance, use the CER Minister's powers as appropriate to provide the transportation network if the infrastructure does not exist as a secondary matter, and if necessary, amend the LTCCP as appropriate to ensure that the infrastructure is required to be extended to provide the transportation network in a timely manner.

Two submitters commented on traffic issues in relation to the Waimakariri Bridge and that it needs to be wider.

OTHER COMMENTS

There were three transport related comments made. Two submitters commented on sustainable and safe public transport while one submitter would like to see the implications of transport planning requirements made compulsory.

Response 7 Co-ordinate and integrate infrastructure repair programmes with infrastructure programmes for new development through regular review... (46)

LIKED ASPECTS

Many submitters generally supported this response, in particular the efficient use of existing infrastructure and coordinated future planning was desired.

BP New Zealand and Z Energy supported the Plan, stating that there is a need for a coordinated infrastructure approach and a regular review, they stated:

Co-ordinate and integrate the infrastructure repair programme with infrastructure programmes required for new development, through a regular review and alignment process (reporting to the governance structures) and to ensure efficiencies and future opportunities are not missed or constrained.

Elliot Sinclair generally supported this Response but think there needs to be better provision made for existing urban infill areas that are currently undeveloped.

A few submitters specifically mentioned coordination of infrastructure developments across TLAs and SCIRT to increase efficiency and produce better outcomes, for example not missing opportunities or ensuring that all possible locations for infrastructure are reached when infrastructure is reinstated or upgraded.

One submitter suggested encouraging efficiencies and future planning of infrastructure through not building in places that create urban sprawl and instead building inner city medium density with accompanying public transport.

The importance of infrastructure as essential for development was identified by one submitter who stated that it needs to be ahead of rebuilding and a lead needs to be taken [by authorities].

DISLIKED ASPECTS

Two comments were made in this area. One stated that there is a need to Co-ordinate and integrate the infrastructure repair programme with infrastructure programmes and another questioned what government structures are referred to in this Response.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A few submitters made suggestions on infrastructure development, particularly area prioritisation and cost efficiency.

Two submitters stated that more information was needed. One specifically on:

greenfields - ability of existing systems to support new connections e.g. stormwater and wastewater disposal or to provide for onsite or small community treatment systems

brownfields - capacity of existing infrastructure to support intensification and that continue repair work is wherever necessary linked to predicted future requirements.

Two submitters raised questions about the plans for the East and Eastern Vision stated:

Provision is required for greater consideration with respect to access to local facilities and amenities especially for the elderly and disabled when undertaking temporary road and footpath closures - consultation with communities with local knowledge can result in improved solutions for this.

Two individual issue submissions were: there is a need for new better oversight governance over Councils and better planning to reduce re-work and cutting up new roads for later infrastructure that could have been put in place before the road was repaired if coordinated.

OTHER COMMENTS

Two other comments were made: this response should not be the primary driver for SCIRT but only where the SCIRT programme will constrain the development of new land and a query as to whether this response is needed.

Response 8. Ensure the use of existing assets and infrastructure are optimised to help manage post-earthquake demands... (46)

LIKED ASPECTS

A number of submitters supported this response, especially the use of existing assets and cost efficiency.

BP New Zealand and Z Energy support this response:

Ensure the use of existing assets and infrastructure are optimised to help manage post-earthquake demands. This will include the implementation of interim network management

plans for the transport system that accommodate repair works and optimise road operations by road type, travel mode and time of day.

A number of one off comments were also made in support: because the response would ensure minimum disruption during the rebuild; because roading repairs are constantly changing post-earthquake, and would also like to see bus routes change to reflect the changes in workplace locations; like to see TLA's establishing trunk infrastructure to enable quick development of already available facilities.

DISLIKED ASPECTS

A few one off comments were made, these included: encouraging truck/car traffic through a focus on roading; repairs being done in small areas and during the day; rail not being considered until 2014; safety concerns regarding CCC roading design and the lack of procedure for dealing with local issues.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Suggestions for doing things differently varied: maximise use of existing infrastructure through more intensive urban development; provide bike lane access between centres; place more emphasis on long term planning; and address traffic congestion in strategic road corridors leading to new and growing urban developments.

Eastern Vision suggested greater consideration is needed when undertaking development of access ways to community facilities to minimise disruption:

Provision is required for greater consideration with respect to access to local facilities and amenities especially for the elderly and disabled when undertaking temporary road and footpath closures - consultation with communities with local knowledge can result in improved solutions for this

Response 9. SD: Review District Plan Transport provisions following the recent adoption of the GCTS and CTSP... (36)

LIKED ASPECTS

Many submitters generally supported this response because it is needed and will speed rebuilding of necessary infrastructure. One submitter commented that it would be pointless to legislate further land use without having appropriate transport integration.

A number of single comments were also made: the proposed northern arterial to QEII Drive would open the CBD to development; the next section of the Southern Arterial should be completed to assist development in Rolleston to 2016; and another submitter supported the response as it would oversee TAs.

DISLIKED ASPECTS

A few submissions were provided under this response, with little consistency between them. One submitter commented on northern motorway congestion, and would like to see six lanes over the Wamakariri Bridge, plus a cycle lane. One submitter disliked the response as it allows the Minister to override community plans.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A small number of suggestions for doing things differently were provided: provide more public transport alternatives; incorporate future increases of energy costs; complete road widening for strategic corridors; include rail links to major townships; utilise the Christchurch Transport Model for assessments of transport implications of land use allocation; and encourage District Plans to have integrated traffic management plans and not just parking plans and there is a need for more emphasis on travel to Selwyn and Waimakariri and not just Christchurch City.

Response 10. Implement the transition, through an agreed implementation programmed, to new public transport 'hubs and spokes' network model. (37)

LIKED ASPECTS

Many submitters generally supported this response without making any specific comment. One submitter commented in favour of the response as follows:

Opening up ease of access to periphery of Christchurch. Makes it easy for satellite centres to get to Christchurch

DISLIKED ASPECTS

A few submitters disliked the 'hub and spoke' model, stating it would lengthen wait times for bus travel. It was thought they can work in some areas but not in others.

Two submitters disliked rail not being included in the model.

One submitter commented that better planning of Rolleston is required.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Three comments on the hubs and spokes model were made: that it should be extended to roading networks; that it should include active transport and that models other than the hubs and spokes model should be considered.

Two submitters suggested mobility and accessibility needs to be included under this response.

Two comments were made on rail – one stated that there should be rail to Rolleston, Rangiora and Kaiapoi, similar to Wellington once there is sufficient population and another desired the inclusion of light rail.

One submitter who stated that they think that transport networks should be the priority and not the last thing put into a development, went on to comment on bus travel, suggesting all buses should be able to carry bikes, potentially allow animals on board, develop more express routes, include car parks for park and ride commuters, and to be more user-friendly.

Response 11. Ensure rebuilt transport network in and between centres provides for a variety of modes (including walking, cycling, public transport and rail)... (115)

LIKED ASPECTS

Many submissions were made in support of this response.

The Canterbury District Health Board, in support of the inclusion of a range of transport modes commented:

Support: the rebuilt transport network in and between centres delivers a range of transport modes including walking, cycling, public transport and rail in and between town centres and residential areas.

Many submitters were in favour of prioritising active transport, especially the inclusion of cycle ways, ahead of infrastructure that supports cars:

Agree - We need to stop building motorways and enhance walking cycling, PT and rail. We have an obesity epidemic, climate change, energy insecurity, an ageing population - all reasons why we need a land use/transport plan which makes us less, not more dependent on motor vehicles.

Two submitters commented on ensuring the safety of cycle ways. The inclusion of rail was also strongly supported among the submitters.

Two submitters supported the response but expressed concern regarding urban sprawl encouraging private car use:

I support R11 and R 13 and may support some of the other responses under this priority but it is unclear exactly what changes will be made and it is difficult to see how transport could possibly work efficiently in an increasingly sprawling city in the context of a Government Policy Statement for Transport that focuses so strongly on increasing private motor vehicle use.

Another submitter made a connection with the outcomes of transport and the success of the plan:

The urban sprawl proposed in the draft plan will primarily result in more motor cars on the road. So the end result of this transport section will need to deal primarily with more cars, which is something I think residents would agree is not something we want. If the result of the plan is more cars, then surely the plan isn't written right.

DISLIKED ASPECTS

A few submitters commented on particular areas of public transport that are currently inefficient. Another disliked that accessible public transport is enforced and another was sceptical about the Response, commenting that the rest of the document supported roads and cars.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters commented on this section, largely expressing support for prioritisation of rail and (safe) cycle modes of transport ahead of car travel. The Viva Project submission stated:

More attention on walking and cycling by providing quality infrastructure that safely supports this.

Two submitters made suggestions in relation to cycle ways: moving them off main roads; and providing a cycle way from Rolleston to Lincoln which could link up to the Hornby-Lincoln cycleway to form a loop.

Protection of rail corridors for future development was considered important by a few submitters:

... a good idea would be to run a relatively wide cycle way running from the rail line/state highway one in Hornby through and past the airport and meet up with the rail line just after Belfast as in the future with all the growth in the west of Christchurch there would be a demand for a rail line through there we just need to protect it now from development by making a cycle way which means when we get demand it would be far cheaper to run a rail line through there instead of having to buy land and houses. It would also in the short term be an excellent way for cyclists to bike through there from the old highway bridge

Alternatively, the all of Government's submission suggested:

It is important to strike a balance between providing for public transport, walking and cycling and general traffic capacity on roads, which will still represent the bulk of the traffic.

Three submitters would like to see the inclusion of trams, two submitters commented on the importance of accessible transport. A few submitters commented on urban sprawl being detrimental to public transport. One submitter suggested utilising publicity to promote public transport. Another submitter made a link between transport corridors and development.

CDHB suggested that the rebuilt transport network be expanded to encompass new business areas and newly developed greenfield areas.

One submitter commented on those living in the Northwest not having good bus service. They suggested the number 108 or 107 (buses) to go further South or the Number 28 to go beyond Papanui High School into the Northwest.

OTHER COMMENTS

The Cancer Society outlined the importance of 'active travel'

Similarly, a commitment to 'active' travel should provide more choice of walking or cycling routes for residents and visitors in local neighbourhoods and connecting to city transport networks and areas of interest encourages 'permeable' neighbourhoods that are 'easier to get around' and thus aligns to the City plan guiding principles.

Ease of access to active travel is more likely to encourage greater walking activity amongst residents and visitors. Indeed recent research in Australia has highlighted the fact that neighborhoods where 'walkability' is embedded tend to have higher levels of walking and other physical activity amongst the community. The research also found that public health campaigns to promote increased Physical activity were more successful in neighbourhoods with good 'walkability' planning than in lower 'walkability' neighbourhoods.

The Cancer society also requests that there be more consideration of sport promotion and activity within the Plan:

Increased leisure services would have a positive effect on the health and wellbeing of children. In 2010, the Global report on Physical Activity and Health stated that maintaining high amounts and intensities of physical activity starting in childhood and continuing into adult years will enable people to maintain a favourable risk profile and lower rates of morbidity and mortality from cardiovascular disease and diabetes later in life.

CCS Disability Action stated:

...Increasing the accessible housing stock is important, but the other piece of the puzzle that transforms accessible houses into 'accessible homes' relies upon where a house is located. Living in central locations on transport routes and near services such as malls, supermarkets and other amenities ensures that people are provided with greater opportunity to engage with the community. It is this connectedness that creates inclusive communities.

Accessible public transport is an important part of accessible infrastructure. The rebuilt transport network is an opportunity to improve accessibility. For this to happen, public modes of transport (buses, trains) need to be accessible. It is also critical that all public transport planning takes into account the need to have accessible routes to local amenities and services.

The usefulness of the public transport depends on its ability to get people to where they want to go. Train stations and bus stops should have accessible pedestrian routes to local amenities, such as community facilities and shopping centres. The accessibility of public transport is diminished if it is not connected through accessible routes to the community.

All land use, infrastructure and transport planning should take into account, the needs of people with temporary or permanent mobility needs. The best way to do this is to consult accessibility experts, especially those with a lived experience of mobility needs themselves.

Response 12. Complete transport analysis for south-western, northern and western development access and growth areas to enable commitments to core infrastructure and service needs...(47)

LIKED ASPECTS

Many submitters supported this response. The majority of submitters' comments were in support of the Southern Motorway, and speeding this process up. Comments that supported this were: long overdue; provides for future needs; new Christchurch needs to have easy access and egress at its heart; motorway extension great, the continuation to Rolleston will be even better:

6000 odd additional sections in Rolleston is great but to avoid the problems we see now with access to the north of the city during peak hours morning and night, serious consideration must be given to accelerating the completion date of the next stage of the southern motorway.

DISLIKED ASPECTS

Four comments were made under this section. One submitter disliked the fragmented approach to transport planning and instead the LURP should have an integrated approach as under Response 9; one submitter disliked the encouragement of growth outside the city's current boundaries because of the long term fuel and associated costs; another submitter stated that the LURP should not have a local detailed focus; and another questioned why the East is ignored.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Two submitters suggested developing more rural/residential land around main arterial routes and motorways to cut down travel times. Another suggested that there needs to be provision for cycles and cars:

I have biked to the airport, and the major 2 lane round-a-bouts are very dangerous on a bike, many many people work and travel via the airport, parking is at a premium, and we should be encouraging people to bike, not discouraging them with dangerous intersections.

One submitter suggested that all essential services in new developments should be within walking distance. Another suggested taking a comprehensive view of land-use options and matching these with a comprehensive view of transport options, that this should be based on the Christchurch Transport Model, be flexible and that all schemes should be 'on the table' to respond to recovery as it emerges.

OTHER COMMENTS

A few submitters asked why the East is excluded from this response. The following comment raised some of the issues:

Transport analysis for Eastern Christchurch especially with North East developments, links from NE – Lyttleton recognising damage to the East. Christchurch and new I/S e.g. Bromley, Heathcote industrial. How will the network cope with developments?

The Cancer society urged the importance of cycle routes:

We would urge C.C.C to use its considerable public standing to influence private developers involved in the rebuild programme and encourage them to include cycle routes and increased pedestrian safety at the onset of their planning for new housing developments. These should be stressed as a mitigating factor to pollution experienced during building activity and as a way to commit to sustainable transport systems.

One submitter stated that identifying improved public transport corridors and more inner city housing would result in integrated green housing and transport solutions.

Response 13. Investigate and protect, as required, future transport options (including rail) for Greater Christchurch... (56)

LIKED ASPECTS

A number of submissions were made under this section. In general there was support expressed for inclusion of rail. A few submitters commented on the importance of future planning, and were pleased to see it included in the Plan.

One submitter commented that intensification of residential and commercial development in urban areas is preferable to urban sprawl. One submitter would like to see funding secured for future transport options at an earlier stage. One submitter supported the response but would like to see more discussion around transport options for Christchurch, and more emphasis put on alternative (non-car) transport options.

Another stated this:

Yes! Let's avoid rebuilding twice. Very supportive of future transport, including rail, to be part of the planning and design. Also intensifying residential and commercial development in urban areas. Much better than urban sprawl.

One submitter questioned if rail needs to be considered in the 10-15 year time period.

DISLIKED ASPECTS

Few submissions were made under this section, and they made differing points. One submitter disliked the timeframe: that investigation into transport options will not begin until 2014.

One submitter commented on the airport noise contour.

Another submitter commented that the LURP is not proactive enough, that long term options are limited and that the funding restrictions leading to response 10 do the opposite.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY.

A few submitters commented on rail: one submitter would like a high level plan; one would like an availability time frame for commuter rail; one submitter would like a cycleway included alongside existing railways, ensuring future protection of potential corridors; and one would like to see commuter rail/tram to the inner city investigated.

Cancer society would like to see the inclusion of active transport infrastructure and safety measures addressed in future transport planning.

Canterbury District Health Board would like to see the Response broadened to include the protection of future active transport routes.

One submitter would like to see ECAN ensure compliance, and not just TAs. The submitter also suggested stopping most of the cross traffic on Brougham Street.

One submitter suggested The Plan needs to be more proactive in promoting transit oriented development. The submitter also commented on the need to secure funding for public transport in advance of rebuilding, not in arrears.

One submitter gave this suggestion relating to new developments:

All developers should have to take a pram /pushchair with kids from their proposed development to the local shopping centre, and school by public transport, in the company of

other parents, and be able to show they have considered their needs before they are given planning permission to go ahead with the development.

OTHER COMMENTS

One submitter commented on urban sprawl causing future transport limitations, for example increasing oil prices will limit travel. One submitter commented on the importance of flexibility in relation to future options. Another stated this is an opportunity to provide some clear guidance.

Priority 4: Encourage urban development that protects and enhances the natural environment, recognises natural hazards and avoids environmental constraints (43)

OVERALL PRIORITY SUMMARY

- There were many comments across the Priority and Responses around developing on suitable and safe land and concern that environmental risks are not being considered enough: flooding, sea level rise, peak oil, energy, protection of aquifers.
- Many submitters sought better protection of the natural environment – ensuring that quality of life aspects – water, air, soil and open spaces are not degraded. Sustainability measures were also sought.
- Response 15 had mixed comments. Based on the comments, it appears that there was confusion as to whether this Response was intended to ensure land vested in the Council for infrastructure meet standards necessary to protect that infrastructure from natural hazards, or whether it was to promote the development of Council owned land for housing. Concern was expressed around the focus on greenfield development which would lead to urban sprawl and there was a preference for alternative approaches.
- Improvement of the geotechnical database in Response 16 was strongly supported with suggestions made by submitters to ensure content is easily accessible to all.

LIKED ASPECTS

The Cancer Society stated support for this Priority and commented on the importance of healthy environments for communities. They stated that they appreciate that these aspects are included in Priority 4.

The Canterbury District Health Board stated support for: the context provided on pages 25 and 39; the statement related to the protection of drinking water; and the development of brownfield land where land contamination and water quality issues have been dealt with.

One submitter stated general support for all responses under Priority 4.

DISLIKED ASPECTS

Three submitters commented on their concern with the environmental risks that may be a result of the current LURP draft. One submitter commented on their concern over the suggested development near the aquifer recharge zone. Another submitter commented on their concern of potential flooding due to excess shingle in the Waimakariri not being removed. A third submitter commented on their concern for a development outcome that exceeds energy supplies.

One submitter commented on concerns for the Priority favouring property developers and risking urban sprawl along with failing to integrate land use and transport planning.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The majority of the suggestions were to do with environmental concerns. A number of submitters suggested the need to protect current natural environments from urban development, enhance and create new environments and encourage sustainability for the future. One submitter suggested the need for sustainability to be an important aspect of this Priority.

A number of submitters commented on maintaining what we have for future generations and ensuring that things that promote quality of life are considered such as enough water, reserves and open spaces. Peak oil and sea level rise were two specific issues discussed.

It would appear that recognizing the effects of Peak Oil and our society's responsibility to limiting climate change by reduced greenhouse gas emissions would thus be important considerations. Planning for urban development has a clear role to play here and this is well highlighted in some aspects of the current document. Energy use may be reduced by planned urban form and by specific building design. Both of these fall within the scope of the current plan. And yet on both counts the plan fails to deliver what is needed.

There has been some concern expressed that people are having difficulty getting clear information about the "change in flood levels" and the map in this document isn't very helpful to anyone living in or newer the affected areas in Christchurch. These maps should be made available to the public- easily.

There was also a desire expressed to preserve food growing soils:

The natural environment that needs to be protected includes the high quality soils beneath the proposed greenfield developments. These soils should be protected for long term food security.

One submitter suggested including planning for flood management and sea level rise in the Plan and the National Council of Women NZ commented on the protection of drinking water in Christchurch and the need for flood level maps to be accessible by the public.

Three submitters commented on needing better building codes and development restrictions in specific areas.

There were a number of suggestions around transport: two submitters suggested the need for better environmentally friendly transport options; another suggested a change to the transport infrastructure to support reduced car use through more cycle ways, walkways and light rail; and another to provide green corridors for pedestrians.

Two submitters suggested the improvements and construction of the Avon River rowing facilities that would enhance the economy and natural environment.

A few other suggestions were also made including: alter ODPs to include community enhancement and make medium density housing a priority.

OTHER COMMENTS

Many submitters commented on development suggestions in the priority. Two submitters commented on the development of their own land.

One submitter commented specifically on the development of P018 land and flood management. They stated that there is inconsistency between the LURP and the equivalent land use provision to do with minimum floor level height.

...Appendix 4 of the LURP introduce a new Rule 32.4.5 (ie not introduced through the decision on P018) that renders any subdivision a non-complying activity where an allotment does not achieve a finished ground level specified in Rule 32.1.1.75. This activity status is inconsistent with the equivalent land use provision, whereby any dwelling is a restricted discretionary activity where it does not achieve the minimum floor level specified in Rule 27.1.1.23.

Two submitters commented on their concerns in regards to the exclusion of current local government plans from LURP. One submitter commented on their dislike for Greenfield development and another in regards to too much emphasis being placed on the airport noise contour issue.

Response 14. SD: Amend CRPS and District plans (as set out in R1) where necessary to identify areas where rebuilding and development is supported and where it may not occur before 2028... (50)

LIKED ASPECTS

Many submitters were in general support of this response, but provided no specific comments.

A few submitters were in support of identifying safe areas for housing.

Te Hapu o Ngati Wheke Incorporation was in strong support of future housing development in Rapaki and Tuahiwi. They also recommended consultation with landowners in those areas.

Two submitters commented that the right identification in areas will allow for greater housing and competition in a controlled manner. Another two supported LURP to amend the District Plans, while one submitter also supported the long-term of the Plan.

Clarity of the plan was supported by two submitters. One submitter commented that this needs to have specific direction and no other plans are needed. They did not want the LURP to be a Plan for a plan.

Efficient delegation of expenses through this Response was supported by a few submitters.

DISLIKED ASPECTS

Bias in regards to land development was the most commented on topic. A few of the submitters' comments suggested that land development has been withheld from small developers/ land owners and only provided to a few large land owners. One submitter commented:

The Selwyn District Council have locked all land for development through Plan Change 7 and intensified development only in those areas to the benefit of a very few large land owners.

Two submitters' comments were concerned with the 2028 deadline (for when building cannot occur). Both submitters suggested this was an unrealistic time frame and is counter-productive as it would not provide opportunities for efficient development processes to occur.

Two submitters also commented that the time frame does not fit with LGA time frames (eg. Rolleston) and would prefer to have only the local bodies involved.

A few submitters were concerned with the urban centres focused approach. The submitters' comments suggested focus needs to be concentrated on sustainability and integrating natural environmental networks with other land uses.

Two other comments were: concern that initiatives would provide a source of frustration, not incentives; and there is inconsistent activity statuses assigned to subdivision dwellings.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Environmental considerations were the main theme made by submitters in this area. A few submitters commented on identifying environmental areas to be excluded for development as well as incorporating these areas into residential areas. One submitter was concerned with development encouraging urban sprawl leading to increased fossil fuel use. With regard to the environment, one submitter suggested:

ADD to R14 'and prepare a spatial strategy for public and private open green space focused upon integrating greenfield and brownfield housing and business land with city wide blue and green infrastructure networks that provide essential ecosystem services'

Concerns for development restraints were commented on by a few submitters. Two submitters' commented on including specific areas to be changed for housing development. Two submitters commented on the potential issue of creating monopolies with existing land owners and developers driving up housing prices:

Constraining development by blocking specific land parcels from being subdivided until an arbitrary point in time will create a monopoly with existing land owners and ...An alternative approach would be to identify land for early development and create a process whereby applications have additional parcels of land added to this plan over time would ensure that in the short term clarity exists with opportunity for competition on the horizon to help keep the market in check.

Two submitters were concerned with the 2028 deadline. The comments suggested removing the restriction prior to 2028 and allow for growth opportunities from now to meet supply and demand and the Council should consider private plan changes as long as they are supported by infrastructure and developers are willing to help.

Two submitters commented that key activity centres should confine densities and not sprawl, to have stronger, more successful communities.

Changing Priority four to Priority one was suggested by one submitter. The submitter commented that this priority will not be accomplished if rebuilding takes place outside the city boundaries, as the Plan proposes.

One submitter suggested that infrastructure priorities should not be determined through LURP but by the LTCCP. The submitter also commented that issues are arising with regard to connecting infrastructure between developers.

OTHER COMMENTS

The LURP definition of where development may not occur was raised as a concern by Elliott Sinclair. Appendices 2-6 were suggested by the submitter to only state where development can occur and is worried that non-development areas will go straight to the Minister without public consultation:

Clarification is required as this has the potential to be unfair to those persons who do not currently realise that the use of their land may in fact be limited, and potentially miss this opportunity to comment.

The process for protecting environmental / open space resource areas are suggested to be void by one submitter.

One submitter stated:

Note the district plan amendments to implement this haven't been included in LURP

Individual submitter comments were: reviewing the New Brighton Master Plan to include reducing the required floor level height for building; the need for infrastructure for development to proceed and not to pick Greenfield winners.

Response 15. Require all Greenfield land vested in councils, be brought up to standard as outlined in respective council infrastructure design guides, in order to minimise the potential for damage from natural events... (38)

[Based on the comments made on this response it appears that there was confusion over whether the land that would be brought up to standard was purely for the purpose of infrastructure or residential development.]

LIKED ASPECTS

Many submitters were in general support of Response 15, in order to develop vacant Greenfield land. One comment was that this will allow greenfield land to do what it was set out to do.

One submitter was in support of the response and suggested the development of “no-build” land for open space and transport networks.

DISLIKED ASPECTS

Three submitters disliked the spending of Council money on greenfield development. Similarly, two submitters commented on their doubts the Government had enough funding to complete this task. One submitter suggested the money should be prioritised for medium density housing development, not greenfield.

Two submitters commented with regard to Council land being developed.

Two submitters disliked the position it puts Councils in – that they will be a land developer and that they will be land owner and developer for residential development.

One submitter disliked the proposed development area and suggested there needs to be a good strategy established for positioning of houses.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A few submitters suggested rewording of the Response. One submitter suggested removing “vested in Councils” because of potential confusion as to what land the response is referring to. One submitter suggested changing “perspective” to “desired outcome”. One submitter suggested better clarification of the term “Greenfield land”. Similarly, Eliot Sinclair commented on their concerns about the response. The submitter suggested the wording is misleading and needs clarification.

... Does this refer to newly vested land where this responsibility falls on the developer? If so, they need to do this anyway for Council to accept the land to be vested. Alternatively, Is this a requirement for Councils to address Internally for all existing land that Is vested with them for public purposes?

A few submitters commented on the standards mentioned in the response. The Canterbury District Health Board suggested that the standards need to be specified further. One submitter suggested that the standards need to be dictated to the TAs. One submitter suggested that land that didn’t meet the standard could be utilised for parks or other areas.

A few submitters commented on their concerns around greenfield development. Sustainable Otautahi Christchurch commented on their concern that the focus on greenfield development would create urban sprawl. They suggested changing the approach to the incentivisation of brownfield development. They also suggested reducing the amount of Greenfield land proposed for development significantly:

To prevent urban sprawl the LURP must implement a containment policy and preferably one that is consistent with contemporary international best practice. This requires the limitation of greenfield development and the incentivisation of brownfield development and re-development of existing urban areas. The LURP should prioritise urban villages which are effectively connected with each other, the city centre, and with the transport network.

Sustainable Otautahi Christchurch also commented that the desires of the community expressed through the Share an Idea process for more medium density housing should be included in the LURP. Similarly another submitter suggested that precedence needs to be on medium density residential development in the inner city of new Greenfield developments.

Two submitters commented on the identification of Council land being brought up to standard. One submitter commented on why this was only applicable to Council land and not private land. One submitter suggested changing to support to brownfield and greyfield land as well.

The Canterbury District Health Board also suggested that the goals and objectives of NERP to be integrated with the plan.

Eastern Vision is concerned specifically with wastewater management. The submitter suggested appropriate consideration needs to be established in respect to water management in brownfield and greenfield developments.

OTHER COMMENTS

One submitter commented on infrastructure, commenting that resilience of infrastructure has been emphasised but not for the Council's infrastructure.

Response 16.Promote as good practice, as part of plan change and consenting process, geotechnical and groundwater data, and assessments and building information to the Canterbury Geotechnical database... (31)

LIKED ASPECTS

Many submitters had general support for this response.

Two submitters suggested that this is already being done as part of the RMA and is already a requirement as part of the consenting process.

DISLIKED ASPECTS

A few submitters were concerned with how the database information would be shared. They commented on whether it would be publically accessible or only shared between private companies and Councils.

One submitter commented on their dislike for the response. They suggested that some areas do not require geotechnical and ground water data for each development.

One submitter commented on their dislike for the allowance of private plan changes caught outside PC7.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Five submitters suggested that the database needs to be easily accessible for the public as well as central agencies. Similarly, another submitter suggested making the database easily accessed online among with DEE results for all buildings.

One submitter commented on whether the Council was the best place to hold the database and suggested ECAN should be in charge. Another submitter questioned whether the database would be included on LIMS.

The remaining suggestions were varied: add an additional section to the response to identify areas that should not be developed due to their environmental status; remove the process as it is already incorporated in the RMA and ensure areas analysed are specified as well; add monitoring of fresh water and effects to the database; remove areas East of Sparks road identified as residential development areas in R16 from LURP. The submitter suggested this was due to environmental constraints.

OTHER COMMENTS

No other comments were made in this section.

Priority 5: Increase housing supply to meet demand (101)

OVERALL PRIORITY SUMMARY

- There were many comments across the Priority and Responses expressing concern around too much emphasis on greenfield development and the consequent potential for urban sprawl which has various implications. Submitters made many suggestions for measures to address this, primarily for there to be more of a focus on intensification/higher density living and brownfield development.
- Many submitters liked the provision for greenfield land in Response 18, especially the proposed Selwyn District Council ODP and rezoning provisions, particularly for Area 11 although many also disliked the Response, particularly the emphasis on greenfield housing and concern around sprawl and the use of PC7.
- There were many suggestions made for Response 18 and Response 19, review of existing residential density and development provisions, although these were varied.
- There was support for the collaborative approach to ensure housing supply in Response 20 and many submitters sought an even wider inclusion in that collaboration. There were a few concerns expressed that the process would be difficult to achieve or would be open to lobbying.
- Response 21 to use government and Council owned land for medium density housing was supported, particularly because of the potential to address and provide affordable housing. The collaborative approach was also liked although suggestions sought wider collaboration and to go even further with brownfield incentives.
- Comments about PC7 usage by SDC being unfair, and that this is an issue that needs to be addressed, was raised consistently across this Priority and its Responses, in particular under Response 18.

LIKED ASPECTS

A number of submitters liked this priority although only a few general comments were made. Submitters commented on liking moves towards affordability as well as the attention on intensification and more mixed-use housing.

DISLIKED ASPECTS

A number of submitters disliked this response due to concern about allowing urban sprawl through new housing developments on greenfield land on the outskirts of the city. These developments were identified as not necessarily being more affordable, having implications for redevelopment of the city, and being ignorant of oil prices and the need to reduce reliance on cars.

The remaining dislike comments were varied: council preventing private plan changes through relying on PC7; very small section sizes (500-600 square metres) will result in limited natural sunlight; concerns for change in subdivisions occurring near private land-holds; limited mention of Eastern areas; proposal to increase DCs does not help increase supply or make land available; enough conditions (e.g. alignment with RMA discussion document and land-banking measures) – some developments take a long time, and raising whether this is really an issue; need more overt consideration for the need for residential development to include community planning concurrently, not as an afterthought and; lacks a specific strategy for intensification.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Many submitters commented on there being too much emphasis on Greenfield developments and the implications in terms of urban sprawl. Various measures were sought to address this: intensification should concentrate on

low-cost, high density inner city housing; intensification should occur in inner suburbs and city; increase medium density housing in self-supporting villages; should be equal priority given to sourcing inner-city sections for development as there is for greenfield; restrict greenfield growth; shift the focus onto brownfield redevelopment; redevelop poorly used, low density land nearer to the CBD; incorporate a green belt particularly where the soil is rich for agriculture; avoid building in areas better suited to agricultural purposes such as Lincoln, Taitapu and Halswell; permit residential densities (10 acres) but give farmers the possibility of covenanting them, rather than selling them, this way farmers might consider purchasing some of the quality land for farming purposes at the higher land values, knowing some of the money could be recouped:

Too much emphasis on greenfield development outside of the CCC boundaries This will hinder the City rebuild and create long term decentralization and reduce requirement for planned and existing community facilities (Schools parks pools etc) and the cost for the same facilities would burden Selwyn & Waimakariri.

It is not appropriate to include Greenfield land adjacent to territorial boundaries, solely (sic) to meet the demand. The environmental (sic) issues should also be considered and the effects of extending uneconomic infrastructure.

A number of submitters commented on ensuring land is suitable for being built on or, re-looking at housing on land in flood plains.

A few comments were made around collaboration, that there are opportunities beyond Response 20 and that the role of local churches, community facilities and community more generally shouldn't be overlooked. A shift in focus from housing to building communities was also desired.

Two submitters commented on council land allocation powers using PC7 and suggested removing these powers or addressing this issue.

More emphasis was desired on: public social housing needs, the CBD, opportunities for cooperative living arrangements for young and old; green, sustainable energy efficient principles; requirements for the extension of infrastructure, temporary housing near original homes, whakatauki woven into the plan; concentrate resources on providing for housing other than rural residential; more explicit consideration of the outside of scope things as they are still important.

A few submitters sought additional responses to be included: 21A, statutory direction for ODP and rezoning provisions for greenfield business and residential land at specific addresses in Heathcote; R30, statutory direction: TAs to prepare low density residential plans under the LGA and a new policy to Chapter 6 of the RPS providing for low density residential development in accordance with these plans; R21A statutory direction: SDC to prepare and adopt a Rural Residential Development Plan under the LGA.

The other suggestions were varied: concern was expressed around the number of applications for rural residential development in Lyttelton Harbour and the cumulative impact this was having on the landscape and suggested provisions in the District Plan be strengthened to protect outstanding landscape values; the minimum area for subdivision in Living 1, TC1 was suggested to be standardised with Living 2 and 3 to 330square metres; affordable housing should be available through proportional ownership (2/3 owned by resident, 1/3 owned by social agency, Scandanavian Model); swap golf courses for the red zone; future proof gardens and keeping of chickens so they become the norm; Government investment is required; pepper potting of socially affordable housing with mixed density provides choices with provisions for all transport choices; and clarification was sought on the percentage of total development lands to be on brownfield and on greenfield development sites.

The Youth Council sought the possibility of having development of key agricultural or recreational land included rather than just brownfield or greenfield.

Another submitter suggested that other land titles within PC71 should also be allowed to commence their reporting work and when that is completed in detail, and shows the area can be subdivided, that too should be allowed to commence subdivision.

OTHER COMMENTS

Two submitters commented that LURP was silent on how to get density and maintain amenity and provided little around strategies for implementation.

One submitter desired a definition of “suitable land” in R21.

Response 17 SD: Amendment as set out in (R1) and District Plans amendments as set out in appendices 3-5 (66)

LIKED ASPECTS

A few submitters liked that the amendments set out in R1 did not rely on zoning as an answer to provide increased housing supply and liked that it would assist with affordable housing.

A few submitters stated that they liked that the LURP directs changes to plans generally as well as specifically. Two submitters liked the inclusion of Upper Styx as a priority greenfield area and others liked the District Plan amendments; more rural residential provisions; and upgrading the triangle of roads around the new recreational precinct in Rolleston.

Two submitters liked this response but conditionally; one commented that the appendices are brief and incomplete and another stated subject to relief sought under R14.

DISLIKED ASPECTS

A few submitters commented they did not like the rules, both generally and more specifically – disliked minimum densities in District Plan and disliked having requirements for a geo-tech report on land already covered by assessments. Another submitter commented that a balance between market driven solutions and regulation is needed.

Two submitters commented on disliking the approach taken to the Plan Change 7 process. Another commented that the District Plan is a flawed process without first reforming the RMA.

One submitter disliked this response as it was seen as a ‘hidden gift to developers’ and commented that there are other ways of increasing housing demands without building new single family homes. Another submitter commented that if land is to be different sizes, please prevent people from building large houses (i.e. from boundary to boundary) on tiny sections.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Two submitters suggested not having to do a geo-tech report when adjacent or neighbouring subdivisions have already started and been cleared. These comments were both in relation to Rolleston. Similarly, another respondent suggested sharing environmental reports if neighbouring properties have already subdivided.

Two submitters commented that Plan Change 7 needs to be reviewed and that it had the effect of squeezing out existing land owners. Similarly, there were two comments made on ODPs. One submitter suggested requiring councils to prepare ODPs and rezone land identified as priority areas as Selwyn is doing in Rolleston. Another commented that the requirements for ODPs is a “business as usual” approach and only adds complexity and delay in project delivery.

One submitter commented that R1 and R17 do not reference Appendix 6 and that this needs to be fixed.

There were a number of single issue suggestions: there needs to be a level of flexibility in the minimum density requirements to provide for instances where such density cannot be economically, physically or practically achieved and that high density should be coupled with amenity areas and roading; that if the section size is smaller, homes should also be smaller; that there should be provision for private plan changes which Council must accept if there is general area continuity and developers are prepared to contribute to infrastructure costs; that councils should be facilitating getting default funding; Government should set up an independent process to allow potential developers to bring proposals forward and add new areas for greenfield development; that excluded land with deferred zoning but inside current structure plan, have its deferment lifted instead of leaving land outside the current plan; ensure land is suitable for building on; and enforce greenfield development to occur around the city first, followed by brownfield.

OTHER COMMENTS

A few submitters suggested including their site in various Greenfield priority areas.

Response 18. SD: Provide proposed Greenfield land-zoning provisions to the CER Minister in a manner that is aligned with provision of core public and private infrastructure and services... (155)

LIKED ASPECTS

Many submitters liked the Selwyn District ODP and rezoning provisions for ODP Area 7, 10 and 11, particularly Area 11. Submitters liked this because it provided landowners certainty over the timeframe, because the areas, particularly Area 11 were close to town centres and amenities, it allowed the areas to be incorporated in the expansion plan for Rolleston rather than having a deferral placed on them; it made efficient use of land already zoned and because it is good land to build on.:

We support this response as it will provide a large number of sections within walking distance of the existing facilities of the Rolleston township which include the swimming pool, dog park, shopping centre, primary school and the proposed expansion of the recreation precinct. Branthwaite Drive (ODP Area 11) is the almost the centre of the Rolleston Urban Boundary as described in the district plan and offers excellent (sic) development opportunities for the requirements of the LURP

A few submitters emphasised ensuring good communication and consultation with landowners and ensuring a mix of sections, both small and large that reflect what people want. One submitter supported this response as it would assist affordability.

DISLIKED ASPECTS

Many submitters disliked the emphasis on greenfield housing and commented the result would be urban sprawl. A number of implications and consequences of excessive greenfield development were identified: health, social, environmental impacts; peak oil; impacts on CBD development and compact living; promotion of 'ex-urbs'/dormitory zones; squandering of Class 1 and 2 (food producing) peri-urban soils and encouraging dependency on cars (when there will be high fuel costs in future):

Specifically, there is far too much greenfield land being allocated to housing developments. The health, social, and environmental costs of urban sprawl are well known and are referred to in the plan. Yet by providing so much land in the outer periphery, the plan will only encourage the sort of inappropriate developments that we are so keen to avoid - that is soul-less dormitories that depend on cars for access to all facilities. The plan should take urgent steps to reduce the spread of such developments rather than encouraging them.

A number of submitters disliked PC7/the ODP process. The process was stated to be flawed, unfair and as benefiting only large land owners. A few of these comments extended beyond disliking the PC7/ODP process to also disliking a number of other aspects: poor planning resulting in costs incurred; lack of assistance or meeting with people wishing to develop; and a lack of transparency around the process for development.

Selwyn District Council has already made these decisions and they have informed landowners who's properties are not included in Plan Change 7 that they will not be able to subdivide or submit Private Plan change even if properties are close to existing ODP planned areas and infrastructure. This process has been unfair.

A few submitters commented on ODPs: that there is a lack of detail as to what additional information is required prior to an ODP area being incorporated (such as provision of infrastructure, geotechnical matters, DCs, multiple ownership issues); that there is a need to define the consultation process for ODPs and that information is difficult to get, and takes time and money.

Other reasons for disliking this response included: land owners need help; not liking the amount of greenfield development in Rolleston (and wanting more in Maddisons Road between Howes and Goulds Road); that the submitters property will be surrounded by housing and no longer suitable in the area and feel as though they have lost an opportunity for retirement on it; developers putting up ugly metal structures and opposition to social and affordable 'pepper potting' in specific areas in each zone.

SUGGESTION FOR DOING THINGS DIFFERENTLY

A number of submitters made comments of preference for brownfield intensification, or at least providing for existing urban land as a priority as well – not just new greenfield areas. Similarly, one submitter suggested not rezoning and another to reduce the amount of greenfield land proposed significantly. Two submitters suggested a containment policy ensuring there cannot be more greenfield land than required to house the projected demand. One submitter endorsed SOC's suggestion that at least 20% of the projected demand should be provided for through brownfield and residential redevelopment.

A few submitters suggested more support from local authorities for development of intensification areas. Two submitters suggested assisting land owners to develop infrastructure and another suggested using the provisions in the current DCP scheme and for councils to be a long term partner with land-owners.

A few submitters made suggestions around working cooperatively, requiring owners to become parties to ODPs, and working with property owners on the development of their land and utilising good communication. More generally, support for land owners was suggested.

A few submitters requested an amendment to R18 to clarify what part of Map A in Appendix 6 it applies to.

Two submitters suggested defining the consultation process for developing ODPs and another two suggested removing the requirement for ODPs because it restricts other development options.

Two submitters suggested including land along East Maddison Road, one of whom also suggested land along Dunns Crossing Road. Another submitter sought to include development for housing down Springston Road in Rolleston.

One submitter suggested the Government run an oversight body to review recommendations for development and similarly, another suggested increasing greenfield areas in Rolleston through a process that is independent of council.

Other suggestions included: that plans should be made and implemented locally and not through the direction of the Minister; that consideration is needed for land-based businesses especially horticulture as a lot has been invested into developing these businesses; allow subdivisions for low density in Helpet Park rezoning; remove the need for geotech reports on immediately adjacent developments with the same soil type when they have been

approved on neighbouring land; for there to be a fibre optic cable plan for Branthwaite Drive; for there to be a Rolleston local meeting on this issue seeing as the area is strongly represented; and that LURP does not show where development may occur even though it is meant to be identified by each council.

OTHER COMMENTS

A few submitters made suggestions to include their piece of land or a particular area in the ODP and rezoning provisions.

Two other comments were: keep density healthy, and that experience of SDC has been good.

Response 19. TA review existing residential density and development provisions to identify possible impediments to uptake of current intensification opportunities... (80)

LIKED ASPECTS

A number of submitters liked this response because it supported the need to increase the supply of affordable sections as well as encouraging more diverse and attractive housing outcomes. A few submitters commented that this was an urgent or top priority response.

Two submitters commented that this response will help prevent urban sprawl.

One submitter commented that it allows TLAs to work with landowners more effectively.

One submitter commented that this is an initiative that has shown to have some success in other jurisdictions and has merit for possible inclusion in a housing recovery action plan.

DISLIKED ASPECTS

A few submitters made comments indicating the response was not strong enough. One submitter commented that reviewing, instead of directing, risks progress not occurring, another that additional intensification should be implemented and one other that intervention was not strong enough. Other reasons for disliking aspects of this response were: that the response is very vague and open to abuse; and a comment that LURP only directs Greenfield rezoning and does not direct a reconsideration of zoning provisions in existing suburban areas of the city.

Two submitters commented that a fair process needs to exist – one in relation to the use of the SDC Plan Change 7, and another in relation to poor public consultation under the RMA. Another submitter commented not to leave this type of review to councils.

Two submitters commented that intensification should be driven by the market – that it will occur as brownfield land is developed and more land should be released for development rather than focusing on intensification. Similarly, another submitter queried whether intensification was needed.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters made comments on the process of implementation of this response. A few submitters commented in relation to implementation, that it needs good leadership, needs to have a fair and equitable review process and that responsibility for it needs to be wider than just District Councils, for example, social housing providers or in collaboration with developers and the community:

Need to have leadership on how to bring this together between developers, regulations, community.

A few submitters made comments on the importance of this response in relation to preventing urban sprawl or wasting productive greenfield areas. Two of these submitters suggested focusing intensification around the city. Another commented on rural-residential as follows:

All urban areas border rural areas - urban growth affects rural land use because of its proximity to the urban area. We currently have a system/plan that permits building in rural areas on a minimum of 10 acres/2.4 Ha as of right. This system inevitably results in all rural land within reasonable commuting distance eventually being broken into 10 acre blocks and the resultant land being no longer farmed in a productive manner. These blocks are mostly on highly fertile and deep, productive loam soils but this land is priced out of farming use due to its value for selling as a lifestyle block. This process could be slowed, or in many cases obviated, by permitting the same residential densities (10 acres) but giving farmers the possibility of covenanting these 10 acres blocks, rather than selling them. Thus on a 40 acre section, 4 houses could be built but in a smaller cluster of say 2 acre sites, thus 8 acres is used for residential/lifestyle and 32 acres is left for farming. Consequently some farmers might now consider purchasing some of this quality land for farming purposes, at the higher land values, with the knowledge that some of this money could be recouped to offset the high purchase price, and the balance of the land be available for productive farming.

A number of submitters commented on ensuring flexibility and not being too prescriptive with this response so that property sizes are not too small, or too big, or intensification is everywhere, or too much in the city which then reduces public space. One submitter commented on being mindful that more density requires more parks and that a ratio is needed.

Housing New Zealand commented that the response does not go far enough and that LURP should provide greater direction to facilitate uptake of intensified development such as a statutory direction along the lines of R27. Similarly, in the all of Government submission, density provisions were commented to need to provide for and enable comprehensive redevelopment, exemplar projects and support incentives for developers and that LURP needs to provide supporting information of best practice typologies and to encourage early exemplars for medium density dwellings. They also suggested defining medium density.

A number of suggestions around housing type and sizes were made, including: still include 3 bedroom houses with small gardens; don't make living zone standards smaller; focus on medium density brownfield development; review residential densities and identify and overcome barriers to alternative (smaller) forms of housing; change the minimum size area for Living 1 TC1 from 450 square metres to 330 square metres, like Living 2 and 3, to enable more houses to be built; include additional provisions for housing and subdivisions; provide 30sqm of suitable land for food production for each household unit; ensure more density for older people such as 2-3 bedroom small units in Rolleston; redevelop cold leaky homes into higher density warm dry homes as per work by transition engineering group at University of Canterbury; include consideration of Living G zone in city and review of the 15 households per hectare definition; enable "granny flats" for younger people; and make it easier for large/single dwellings to be inter-wall divided.

The remaining suggestions for implementing the response differently were quite varied: remove restriction on 2028 date and population growth estimates in Rolleston; include hill-side development in this review; ensure consultation with stakeholders and development community is undertaken within 6 month timeframe specified; existing residential areas to be reviewed in medium size pockets of blocks in similar ways as existing special amenity areas; clarify what is meant by 'possible impediments' and amend the RMA to free up legislation.

OTHER COMMENTS

No comments were made in this section.

Response 20. Establish a process to work collaboratively with housing developers to identify ways to ensure the timing of supply matches demand (to address land banking), while ensuring associated public and private core infrastructure is provided as it is needed. (64)

LIKED ASPECTS

A number of submitters liked that this response could help increase the supply of affordable sections and dwellings in appropriate areas:

Support the need to increase the supply of affordable sections and dwellings in locations where they can benefit from and contribute to community wellbeing and amenity.

Support a more collaborative approach for housing developments and to work with the Council (s), particularly joint ventures to deliver quality affordable housing.

A few submitters liked that this response addresses land-banking and two submitters (CDHB and all of Government) liked that this response supported the establishment of processes that ensure infrastructure is provided alongside sections for development.

A few submitters liked this response but with provisos: ensure stakeholders are not missed, ensure new developments are not rushed and approved without sufficient consultation; ensure it is transparent and not limited to only housing developers.

Two submitters commented that this response is urgent and one submitter commented that this response assists with long term planning.

DISLIKED ASPECTS

A few submitters commented this response would be hard to achieve, expressed doubt it would work and noted greater powers are required to solve the issue.

A few submitters expressed concern that it is a subjective process, that it is likely to be open to lobbying and influence of others and would result in cheap housing developments making developers rich quickly.

One submitter commented they would agree only if Councils cannot interfere in land supply and the process is allowed to be market-driven. They also commented that SDC has over-restricted greenfield developments and noted the issues with PC7.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters sought the inclusion of more than just developers in the collaboration: communities, residents associations, relevant NGOs and developers excluded from LURP but who are in close proximity to developing areas. Concern was expressed around developers being promoted above the community, thus addressing community needs, ensuring integration of housing developments with established neighbourhoods and adding in community led initiatives were recommended:

Would like assurances that this process is not being led by developers, but with the community needs at forefront.

A few submitters expressed concern about councils being involved in this collaboration. One submitter commented councils should not actively block developments nor support large land owners through the ODP process but not allow private developers to do it on their own. It was suggested by one submitter to create an independent body to do this work, or oversee councils and it was suggested by another submitter that the Crown lead and produce affordable housing and open up new greenfield land.

Comments around land-banking included: where land-banking has occurred, as might have been the case in PC8 and PC9 rural residential zone in Rolleston, provide for a total number of sites to be presented to the market without sequencing which presently limits the availability of sites in the district; don't address land-banking through penalties, use incentives instead; and the Human Rights Commission commented that while collaboration will always be supported, the suggested approach to addressing land-banking is limited only to this, but stronger measures are needed.

The remaining suggestions were varied: encourage smaller sections for houses for retirees and solo-parents; provide more detail around this process – what it is, how will it be implemented; separate land ownership from home ownership; RM reform sunset clause is not going to work, rates increase may be better; timeframes under Schedule 1 an impediment to achieving timely delivery; remove restriction of blue area in East Maddison Road (between Goulds and Howes) which restricts development before 2028 and provide water, sewage, kerb and channelling – the section should not remain inner rural zoning.

Response 21. Identify suitable government and council-owned land and initiate exemplar projects for redevelopment, especially medium density and/or Brownfield developments... (81)

LIKED ASPECTS

Many submitters supported the provision of affordable housing and sections (one submitter commented especially for university students) through this response. A few submitters also commented that this is a priority or urgent:

Support: the provision of incentives and the promotion of exemplar projects that will deliver quality social and affordable housing. (CDHB)

Similarly, Housing New Zealand commented that high profile promotion for redevelopment is essential and welcomed the opportunity to work with CCC and others on initiating exemplar projects for medium density development to accommodate opportunities for quality social and affordable housing. They commented that the LURP can go beyond just proposing these exemplars and progress them.

A number of submitters commented that they supported a collaborative approach for housing developments – working with Councils, Housing NZ and joint ventures.

Two submitters liked the emphasis on encouraging brownfields, low-to-high density developments and exemplar medium density developments.

One submitter commented that developers tend to do what has worked in the past but that examples of a new approach will assist in wider uptake of new ideas.

DISLIKED ASPECTS

A few submitters disliked that the land owned and leased by Housing New Zealand would be taken and given to developers who would profit and have little incentive to provide affordable housing. Similarly, two submitters made comments that cautioned council involvement, one commented there would be a conflict of interest and the other to ensure good control of this process to ensure councils are servants of the communities they serve and not trying to be planners as well as redevelopers.

One submitter commented that 'exemplar' and 'identify' does not inspire change and that it is too weak.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Suggestions for doing things differently for this response were varied.

A number of submitters commented on needing to remove barriers/de-risk and provide incentives for brownfield and mixed density developments. Suggestions included: increasing incentives, have Government take the lead on

key projects, particularly when the market does not know how to do it; offer incentives such as reduced development contributions, waiving or having fixed resource consent costs if timeframes and standards for design and sustainability are met; eliminate development fees for social housing and deal with issues of length of time – fast tracking. Financial incentives for low-middle households to move into higher densities was also suggested.

A few submitters suggested wider collaboration. Eastern Visions commented that LURP promotes an over-reliance on HCNZ and suggested considering alternative provision of social housing using international models such as joint ventures (public/private), incentives, housing associations etc. that take into account higher density, mixed housing with options of shared areas and amenities that develop a neighbourhood village ‘culture’. Other suggestions were to look to third party social housing providers, have wider consultation involvement, encourage opportunities to communicate and include not for profit groups. Similarly, a greater sharing of information, for example MBIE homelessness survey, preliminary scoping of housing market assessment was suggested by another submitter.

A few submitters provided specific housing type suggestions, although these varied: less 4-5 bedrooms and more 1-2 bedrooms with land for growing food; make incentives for larger 2 bedroom (retired, young families) or small 3 bedroom houses; smaller lots with community garden areas and shared for recreation; open up council housing for young families, single income and retirees downsizing, and house style and size should emphasise good sustainable design – solar heating, insulation, water saving etc.

Two submitters made comments on providing more information: CDHB recommended providing more explanation on different priorities for social and affordable housing and the All of Government submission commented it would be useful to identify specific initial exemplar sites under R21 for the next draft LURP to show visible progress demonstrating quality comprehensive redevelopment in priority areas.

Other suggestions for things to do differently varied: stronger direction on social and affordable housing; resolve issues around ownership and insurance so that medium density dwellings appeal; avoid low-income ghettos; promote mixed use such as the VS urban village; consider buying more land mixed in with privately owned housing; ensure Housing NZ homes are looked after and kept tidy so as not to reduce the value of any private home properties nearby; Housing NZ should provide accommodation close to the centre so there is good access to services and facilities and; that this should be main focus of LURP and could be broader than just council owned land.

OTHER COMMENTS

The CDHB commented to be mindful that housing affordability is not just about the cost of a house and the land, but includes associated living costs such as transport, therefore houses on the outskirts of the city may not necessarily be cheaper.

Another submitter queried the mechanism for approving council land and exemplar projects, noting that these projects are still likely to require resource consents but that there is a potential conflict in regards to the outcome and needs reference to R4. Private developers currently trying to achieve this are having consenting/notification issues already.

Priority 6: Increase housing choice to support the recovery (88)

OVERALL PRIORITY SUMMARY

- The focus on providing different housing types and density options particularly brownfield development, and affordable housing was supported across the board, especially in Response 22.
- Many submitters liked the review of development contributions in Response 23, although more detailed exploration and explanation of this was desired. There were a number of other varied suggestions made to do with development contributions
- The housing assessment in Response 24 was supported and a number of suggestions as to what the assessment scope might include or address were made.
- Many submitters liked Response 25 and 26, with varied reasons given. There were a number of suggestions around the 'floating zone' for Response 27 with further clarification of its detail requested.
- Many submitters liked the sustainability focus of Response 28. A number of suggestions sought the response to be stronger – such as text change suggestions and 'requiring' rather than 'promoting'.
- Response 29 and 30 were supported although concern was expressed over the number of sections suggested in proposed WDP changes for Response 29. There was also a desire from Maori for there to be significant consultation in order for them to be in control of these developments.

LIKED ASPECTS

A few submitters supported development of medium-density housing. Housing New Zealand commented that they were highly supportive of opportunities to provide incentives and mechanisms that would encourage medium-density housing types. Another submitter supported the concept of medium-density housing being encouraged in mixed-use development in the city centre.

Many submitters commented on their support for housing types and density options for development. A few of the submitters supported small-density housing as a source of affordable housing for people with limited income such as the elderly. One submitter commented specifically on their support for the Response's commitment to "green" homes. A few submitters commented on their support for having a variety of housing densities as an important aspect for establishment of socio-economic strata. Two submitters supported the idea that everyone gets access to safe, healthy and affordable housing.

Te Hapu o Ngati Wheke Incorporation commented on their strong support for the use of incentives to encourage a range of housing types. They also suggested some alteration to the contribution requirements and supported the recognition by this Priority of the impact of the earthquakes on Ngai Tahu families and the incentives suggested to facilitate the return of land-owners to traditional areas.

Development contribution requirements for developments in MR875 are recommended by Rapaki to be reduced in the proposed review.

Engagement by ECAN and CCC with Te Hapu o Ngati Iwheke to meet this initiative [sought]

The Canterbury District Health Board were in support of responses related to this priority.

Support: the inclusion of mixed density housing, brownfield incentives, the integration of public transport and community facilities around key centres and catalyst projects demonstrating medium density and affordable housing as 'key responses' in the recovery programme. The implementation of this variety of interlinked responses, will significantly contribute to the health and wellbeing of residents in the greater Christchurch area. We

specifically support the inter-relationship between these areas as having the potential to significantly improve the health of the population.

DISLIKED ASPECTS

Five submitters disliked the suggestions around small density housing. A few submitters commented that section sizes were too small when there is demand for larger section sizes. Two submitters were concerned with the location of small density housing next to large housing and how this may change the community structure.

Two submitters commented on their concern with housing affordability. One submitter commented that present design contracts (building company requirements) for higher density development were preventing affordable housing options. Another submitter commented on their concern that increasing the minimum lot size in Lincoln would reduce housing choice and work against affordability.

One submitter was concerned about who was deciding the urban design and wanted more public consultation.

Another submitter suggested achieving raised density was a key problem.

ACTIVITY CENTRES AND TRANSPORT CORRIDORS—Developments to raise density key problem with plan—no incentives or designations for Brownland residential & business development.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Five submitters suggested applying housing choice development to additional areas not suggested in the Priority. A few submitters suggested applying the Priority to outer rural suburbs such as Rolleston and Prebbleton to meet the demand for housing in those areas. One submitter suggested addressing old areas such as Linwood and Aranui for new housing developments instead of out West. Another submitter suggested considering development of the Cranford Basin for residential development.

Five submitters suggested wording changes to the proposed priority. One submitter suggested getting the language away from “temporary”. Another submitter suggested the need to change generalised statements into specific and directive text, making ‘enable’ happen. The submitter felt a conduit needs to be established along with identification of the people who can do it. One submitter suggested installing sharper strategies for encouraging a range of housing types into the Priority. Another submitter agreed with the previous statement adding that these needed to be expanded and incentivised.

A few submitters commented on their concern of the development process and decisions. Two submitters had concerns in regards to whether the current development proposal could rely on the current market. Two submitters suggested that current developers will not supply affordable housing and recommended intervention by new players and the Government. Another submitter suggested the issue with affordability was due to high building standards and called for new techniques to provide quality housing at lower costs, such as mass produced portable homes.

Two submitters commented on changes to ODPs:

More flexibility required in ODP division plans to allow future use of medium density areas to allow greater choice of section sizes to meet demand.

Reinstate the Rolleston structure plan and remove requirements for ODP’s for small developers.

A number of submitters commented on varied specific alterations to the priority: the recognition of village hubs such as Sumner and New Brighton in the plan, not just KACs; no change to airport noise contours, allow TC1 land to be developed; ensure consideration is given for the provision of churches and community facilities to meet increased demand at new residential developments; the district plan to act as an enabler for Te Ture Whenua in regards to partitioning subdivisions; further streamlining processes for joint venture projects; accessibility for

under 40 year olds and single parents to over 60's units; and including high-end housing development in the Sumner and Taylors mistake area to meet the proposed demand.

This submission also wanted hill land considered.

It is our submission that while the preliminary draft plan addresses the very vast majority of needs for lower to mid market green field developments and commendably promotes the development of brown field projects we are of the view that there needs to be opportunities for the replacement of signature properties on the Hills and for the further development of new property by those who have sufficient capital to choose in which city or in deed which country they may live.

OTHER COMMENTS

The National Council of Women New Zealand voiced their concern that the Priority does not feature social housing. They also commented on their concern that urban/suburban sprawl will not address housing affordability and will come at a higher expense, due to the inefficiency that comes from developing away from the centre of the city.

One submitter who is quoted below suggested that brownfields should have more focus for housing development than Greenfields. The submitter raised concern that current Greenfield developments already lack local facilities and proper infrastructure such as cycle facilities, churches and sports grounds. She encouraged more emphasis on brownfield development close to the centre of the city:

We should be focusing more on brownfields, inner city intensification and housing. There are already huge number of Greenfields subdivisions in progress and the CCC shows little sign of being able to keep up with developing cycling and walking infrastructure for moving around the suburb, based on what is in the draft three year plan....

...LURP must making it much easier for developers to attempt brownfields developments rather than threatening Christchurch's economic and social future by encouraging new greenfields developments.

Living streets emphasised the need for greater provision to promote walking and cycling in the Plan and made similar points in the submission immediately above:

...concerned with had the increased costs from sprawled development: new subdivisions beyond urban boundaries require further services and infrastructure which increases the cost of housing. ... Development such as this relies heavily on the private motor car and are energy inefficient. It is expensive for new subdivisions to be so far from suppliers and work. This increases fossil fuel use and travel costs for future residents. / Therefore we support inner city housing. The plan needs to encourage and promote a more compact city and more housing choices (mixed use, medium density) and good urban design.

A wording change was suggested:

*R28- We would prefer this response to be worded as "promote cost-effective, innovative and **sustainability-based** design, construction and development solutions to enable and support rebuilding".*

Another submitter suggested the need to alter ODPs, so they are not so rigid in order that density levels can be later altered.

Other one-off comments were: the SDC plan to change minimum section size at Lincoln from 500 to 550m² works against this Response; medium density housing is the least supplied into the market; TLAs reduce the chances of this happening because restrictive planning requirements work against this response; family home designs are

growing and there is need for greater variety; Ark Housing Trust suggested an affordable home completion and stated they can build homes at \$1400 sqm; there is already enough affordable housing choice; what will KACs include?; five bedroom homes need a semi-detached second kitchen so they can eventually be shared by baby boomers; need to state realistic specific affordability targets; more choice means people can age in place; needs to be based on real information (in respect of the housing market assessment in R24); need temporary housing close to existing housing so people can retain mental health; temporary housing needs minimum standards so they can become part of permanent building stock; need green communal space in every village to attract people and business.

One submitter suggested their land be identified as a priority area for rural residential development and suggested it would better enable Priority 6 to be achieved.

Response 22. District Councils and CERA to identify and implement methods, in collaboration with developers, that incentivise development of land in suitable existing urban areas... (97)

LIKED ASPECTS

Submitters liked this response because it supports moves to promote cost efficient housing and increases opportunities in the affordable housing and section market. Two submitters commented it was urgent, and others that: it would enable good planning; that it presents a good chance to have balanced residential expansion and new residents for high, medium and low density housing; that we need to make sure it happens in practice and be careful with public dollars in achieving this Response.

DISLIKED ASPECTS

The dislike comments were varied.

Two submitters disliked R22 and commented on PC7. One submitter commented the SDC PC7 was completed a long time ago and shouldn't be relied on and used now and that small landowners should be allowed to develop in East Maddison Road. Another submitter commented that land available is being distorted by council through PC7.

Other submitters disliked R22 and commented: the section referring to "nullify restrictive covenants" means get rid of RMA requirements for green space so they can be developed; short term blindness and profiteering will result in long term impacts; intensify rather than sprawl; has the potential to distort the market and place unnecessary risk on taxpayers, if risks are reduced by underwriting then land values will increase; potential for public money to be tied up in developments which may become 'white elephants' (burdensome projects); change proposed to increase minimum lot size from 500 square metres to 550 square metres at Lincoln; and the process is open for corruption if it is not transparent.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters sought wider consultation and work with communities and whanau to assist in understanding what their needs are. There was also a desire for wider circulation of information. On a similar line of thought, in the All of Government submission, it was recommended that LURP should consider areas within existing communities that are socially and economically vulnerable and how any redevelopment and emphasis in particular brownfield areas will impact upon these people and communities i.e. for eastern suburbs and Kaiapoi.

A number of submitters made suggestions on brownfields – focusing more on them, removing limitations placed on them from District Plans and promoting intensification in areas close to town centres. Consideration of incentivising a wider audience by ensuring incentives are for the right features of brownfields such as accessibility and affordability was suggested, along with considering ways of dealing with NES on contamination for brownfields as this is likely to be a large cost and therefore a barrier.

A few submitters suggested innovative seed funding initiatives around shared ownership, mixed equity, housing co-ops/association and exploring overseas models. One submitter commented that it seemed only Council and Housing NZ would be funded but there is a need to think beyond that limitation.

Two submitters sought more reliance in the market to provide for different sectors of demand with one submitter commenting that generating competition is the role of the regulator, not providing it.

There were a number of suggestions for various aspects to be prevented: restrictive covenants relating to house size and style; restrictive covenants generally; minimum floor size; any restrictions that does not allow relocation of homes (big barrier for red zone homeowners shifting their houses); any private covenants that effectively preclude the development of affordable, accessible housing in each of the three district plans (HRC); and SDC's reliance on PC7. As a contrast, one submitter commented that restrictive covenants are private agreements and public interferences is heavy handed; there is demand for high quality subdivisions and covenants provide certainty.

There were many and varied specific suggestions for how to do things differently: put affordable housing into the market at less than \$400,000 utilising existing resources; enable further subdivision of current 'lifestyle blocks' within SDC e.g. 10 acre down to 1-2 acre blocks to relieve pressure on greenfield; enable farmers to put covenants on 10 acre residential blocks to encourage them purchasing rather than selling; look at council, Government, Ngai Tahu or others to own the land leased for new housing for people under \$300k pay out on superannuation or disadvantaged with option to buy; retain current minimum lot size in Lincoln Living Z zone as will offer more housing choices; pepper-pot infill; council to initiate ODPs to suit infrastructure not developer's desires; design temporary accommodation for older person units, but use them for the next 5-10 years as temporary accommodation; develop Living G zones with different densities within large blocks; take areas within existing living zones and create new rules within blocks to suit new current and future living requirements; reduce consents so people can afford to buy houses and do the landscaping themselves later.

Many comments were made in the all of Government submission and the Human Rights Commission submission. The HRC acknowledged the recent NZ Productivity Commission Report and noted that land use planning incentives and controls can have an overstated impact on the affordability of houses when compared with other factors such as building costs, land costs, building industry dynamics, taxation treatments and demographic trends. They recommended making the most of the current opportunity to ensure land use planning has the maximum available effect on housing affordability and accessibility.

More specifically they commented that there appears to be no clear link between proposed incentives, rules and initiatives and providing housing for the most vulnerable. R22 was commented as going some way but only requires CERA and TAs to assess the potential for affordable and social housing when looking at incentives – no mention of accessibility of the developments.

The Commission recommends a clearer and stronger approach to nullifying the effects of private sector covenant rules and the use of land banking by private developers to push up the price of land for housing. Nullifying restrictive covenants is simply one approach that CERA and territorial authorities can take in working collaboratively with developers to develop undeveloped land (R 22).

In The All of Government submission it was commented that LURP should more clearly articulate housing pressures (particularly housing for low-income families and vulnerable communities) and potentially propose further measures to address these. It was commented that MBIE should be included in the list of agencies for further work indicated to explore restrictive covenants.

One submitter commented that the Response overlooks the potential for existing urban undeveloped land providing timely delivery of housing and infrastructure and overlooks the impediment of existing District Plan zoning.

Other comments were: provide of affordable housing in all developments: ensure transparency; and ensure building in areas not prone to floods, liquefaction or on land suitable for horticulture agricultural use.

OTHER COMMENTS

There was a query as to how plan rules under the RMA nullify Property Law Act provisions and it was commented that we need to challenge the ¼ acre thinking of New Zealanders.

Response 23. SD: District Councils to review (including cost and opportunities) and provide to the CER Minister any changes to development contribution policies and provisions to incentivise the delivery of a range of housing types... (60)

LIKED ASPECTS

A number of submitters especially liked the review of development contributions (DCs). A few submitters liked the attention to brownfield development and the range of housing choice, identifying medium density, mixed use and affordable housing as what they liked in particular. One submitter commented the Response was urgent.

DISLIKED ASPECTS

There were few comments in this section: sounds good in practice but smaller District Councils have only 6-7 people making these important decisions and it's very business as usual; must support keeping and adding green spaces and parks; has the potential to distort the market; and questioned developer contributions and the need to pay for existing Prebbleton and Lincoln to be connected.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters in this section sought more work on development contributions.

In the All of Government submission it was commented that LURP should identify (as a response), a review of Council DC policies to ensure they respond and support recovery and address the relative costs of growth in greenfield and brownfield/existing urban areas. Similarly, CDHB sought that additional detail regarding incentives around development contributions and public amenity improvements is provided.

One submitter stated that the \$30,000 contribution required as a DC has killed infill housing, because previously that was the profit margin. And similarly one submitter stated remove consenting fees, reduce or remove DCs, and rely on self-provision.

Two submitters suggested keeping DCs consistent across all parts of the district and another two submitters commented on DCs in relation to SDC – seeking provision of more direction about expectations and resolving distorted DCs. Similarly, it was stated that TAs don't have incentives to minimise DCs, existing laws must be policed better or re-written to incentive at an affordable price. Also, it was suggested that DC's should be spent in the area that they are collected in.

One submitter suggested that DCs could be paid over 10 years which could help get displaced red zoners more options – tie this into their land title and would be repaid on transfer.

A few submitters stated a desire for stronger advocacy for brownfield and the need for more suitable locations for brownfield.

Incentivise medium density housing bordering on green areas and supporting public transport and active transport was suggested by one submitter. And similarly one submitter stated that DCs need to take proper account of cost to the wider community of extending infrastructure. Higher density on greenfield areas (15hh/ha) was encouraged

by one submitter. Directing resources to prioritisation of higher density development was suggested by another submitter.

OTHER COMMENTS

One submitter expressed confusion over this response as the Annual Plan proposed by CCC currently disincentives development and current DC contribution rises proposed do not align with this direction. Another submitter commented that DCs pay for infrastructure and the money has to come from somewhere.

Response 24. Complete a housing market assessment (in collaboration with MBIE) to better understand present and future housing market supply and demand... (60)

LIKED ASPECTS

Many submitters were generally in support of this Response and supported a housing market assessment and suggested that this be promoted widely, to be shared by all. One submitter stated that good information is needed for decisions to be based on. Another stated it is needed because Christchurch is in a unique situation. Another stated it needs to be a global initiative and not limited to the fringes around community hubs.

One submitter suggested this Response should be prioritised to be carried out within the next three months.

A few submitters commented on specific market demands such as the demand for varying section sizes for the different needs of people as well as breaking up a sterile environment.

One submitter specifically liked the inclusion of estimated expected potential of housing demand on page 36 of the draft.

Response included an estimate of the expected potential of housing demand to be taken up by infill, push to introduce a 'target' for this sector of housing supply but allow to show that there is a significant gap between housing demand and supply of potential Greenfield sections.

DISLIKED ASPECTS

Two submitters generally disliked the response and two submitters commented that this is not needed to be done - one submitter suggested this was already being done by the UDS and Area Plans, the other submitter suggested that the Rolleston planning staff had already assessed this. They both stated, just get on with it.

One submitter disliked that the assessment did not cover housing in re-zoned areas.

Affordable housing should be for everyone, not 'as well'. Not covering housing in the red-zone is a lack of holistic interpreted plan.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The All of Government submission acknowledged that the MBIE and CERA were producing a Housing Market Assessment that can be utilised by LURP.

We note MBIE, in collaboration with CERA and the strategic partners, are producing a Housing Market Assessment. It will identify the balance of housing demand and supply and how this may change over time, including a specific focus on affordable and social housing. The draft LURP should identify subsequent actions following this assessment, to ensure that the information is used effectively.

One submitter stated that Canterbury University have already done work on this and they found that there are needs for university students, elderly, young professional couples and single parents – all can be served by medium density apartments.

A number of submitters suggested making adjustments as to what the assessment would analyse and include. The Canterbury District Health Board invited the LURP team to involve them in development of the housing market assessment. They suggested the assessment needs to take into account the needs of vulnerable people in regards to housing choices. Other submitters on this topic stated: include analysis of appropriate land use of existing residential areas; assessment should include community input on their needs; assessment should include more thorough research on emergency housing; the question was asked who was going to pay for the assessment and suggested the Council already has the information it needs; the challenge is that the different housing types are expensive to produce; examine opportunities for appropriate land-use of existing residential areas (minor household units); scoping needs to ensure that the assessment gives the answer that is actually desired; more information on the demand side – affordability gap; need a good process for the development of ideas, not just research; needs to focus on those most at need and vulnerable; social and affordable housing are not the same thing – Vienna example of high-end inner city social housing suggested, and not social housing on its own.

One submitter suggested that the assessment should include housing tenure, affordability and dwelling size- the needs of the public more than demand.

Another one-off comment stated: ex red-zoners need to be able to move into a village type environment rather than a sterile subdivision (a pure number assessment isn't enough, type of living outcome wanted is also needed).

OTHER COMMENTS

The Human Rights Commission stated,

In summary, this situation indicates a failure of the State to meet its human rights obligations to provide for the reasonable housing expectations of Cantabrians since the major earthquakes of September 2010 and February 2011 and indicates this is likely to continue into the future unless comprehensive measures are taken. The Commission is of the view that the authorities involved in developing the LURP need to urgently recognise this situation and commit to developing a comprehensive housing recovery plan. The housing recovery action plan would need to include:

- 1. A Housing Market Assessment and on-going monitoring and reporting of developing demand and supply issues with a specific focus on adequate housing for the most vulnerable*
- 2. A comprehensive approach to the assessment of need and the supply of social housing including a requirement that all new social housing be fully accessible.*
- 3. Establishing a single point of housing needs assessment perhaps through Work and Income New Zealand*
- 4. Establishing a comprehensive approach to land use planning incentives and controls to ensure these have the maximum amount of influence on the supply of affordable, accessible housing*
- 5. A clear articulation of the desired outcomes for promoting and/or subsidising exemplar or catalyst housing projects, particularly linking the development of these projects to the provision of affordable, accessible housing and/or social housing*
- 6. The supply of land zoned land for intensification. Currently the land zoned for intensification is limited mainly to the area outside the central city but inside the Four Avenues. Intensification zones need to be available in all areas marked for housing development e.g. Kaiapoi, Rangiora, Lincoln and Rolleston.*

Elliott Sinclair stated that the terms of reference of the assessment need to be publicly available before it is actioned so it can be commented on and gets the scope right, particularly around increased density in urban areas.

The remaining single issue submissions were: is there enough 1000m – 2000m sections?; one submitter provided a suggested estimate of demand for sections: ¼ Selwyn residential, ¼ Christchurch red zone – Selwyn, ¼ rebuild – people moving to Canterbury.

Response 25. District Councils to identify and implement programmes through annual plans, long term plans and three-year plans for public facilities, services and amenity improvements to enhance redevelopment opportunities around targeted Key Activity Centres. (37)

LIKED ASPECTS

Many submitters support this response. Three of these submitters stated that there is an urgent need to increase housing choices as to location and dwelling size and that a large part of this additional provision must be in the form of affordable housing. One of these submitters suggested that this should happen within the next three months.

A single submission stated that Councils should work together on public facilities.

DISLIKED ASPECTS

One submitter cited the unnecessary purchase of land against ratepayers' views (on Levi's Road) as an example that there is no room for ratepayer input into these plans. Another expressed concern about who would pay and the impact on rates.

It was submitted by one respondent to reinstate a neighbourhood centre at Farringdon corner East Maddisons and Goulds Road area. This has been removed from the planning and reduces south-west amenities.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A couple of submitters suggested: 1) this response needs to be amended to include the myriad of neighbourhood village centres along with the KACs; and, 2) make them self-sufficient villages of medium density and mixed housing types. Similarly, another submitter commented that there should be a broader neighbourhood focus and public meeting spaces need to exist for 'village infrastructure' not just KACs.

Another suggested to make the focus more of a community centre like Lyttelton, similarly another suggested New Brighton should be a key hub.

The remaining suggestions varied: consultation needs to be given to intensification along transport corridors; Councils do not have to own the property for library and public services; provisions for public facilities should be sped up for Rolleston; and another recommended targeting intensification around KACs.

OTHER COMMENTS

One submitter queried whether LURP was strong enough to prevent ghettos, especially in brownfield areas.

Response 26. Work in partnership with local government and central government, not-for-profit organisations and the private sector to undertake developments (possibly as public/private partnerships and joint venture projects) ... (59)

LIKED ASPECTS

Many submitters supported this Response, with five of these submissions citing it 'urgent', an increase of housing choices (location and dwelling size), as well as, to enable comprehensive residential development within existing and fringe urban areas. Two long letter submissions stated: 1) seek discussion with ECAN and CCC for development of initiatives for affordable housing in Rapaki Bay; and 2) engage with Te Hapu o Ngati Wheke to explore opportunities for social housing development within Rapaki.

Another agreed that this Response would reach the more marginalised. Two of the submitters who liked this response were seeking some understanding of the Kaiapoi North red zone.

DISLIKED ASPECTS

One submitter stated that it is better to make good planning rules and let the market get on with it. Another said this sounds good in principle, but in reality do not leave it to the small Councils to decide as only a very few people actually make the decisions and even fewer private sector land owners benefit.

One submitter stated that it is not acceptable that with medium density housing, our remaining green space is going to SFDs [direct quote from submitter] Another suggested to keep within city boundaries as it would be terrible to force homeowners out of the city with the resulting travel costs and loss of community and school venues.

One submitter disliked this response as there is no need for affordable/social housing to be accessible. Another stated that provision for more elderly housing in Rolleston with specialist developments was missing. One queried how to control outcomes.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter stated that the current wording of this response is far too weak and slow moving. Another recommended that developers be allowed to create mixed tenure with Housing NZ private partnerships; whilst another said to get rid of 'demonstrate' and make happen on the ground—medium density for HNZ and others; and, another said HNZA should have a mandate to buy and/or acquire land and amalgamate titles to create medium density housing developments that are exemplar (Hobsonville in Auckland). Also submitted was a call to begin to repair the growing home affordability gap by using HNZA land.

One submitter suggested that covenants need to be addressed. Another queried why Council and Government did not do it alone without private partnerships. Three submissions were specific to Lincoln, two queried if there would be council housing in the future or any sheltered housing for the elderly; and the final was a reminder that people grow older and cannot manage gardening and looking after large properties—terrace type with 'pocket handkerchief' gardens was recommended.

One submitter suggested increased density around major shopping areas, allowing people to live near these hubs of transport and infrastructure.

OTHER COMMENTS

One submitter questioned where the incentives are for developers to provide good design. Another suggested that the CCC be encouraged to use the "Breathe" material (see R22). One suggested the use of incentives versus regulations. One submitter pointed out that the Housing NZ opportunity to contribute to the recovery will be lost if LURP is not specific.

One submitter explained that there is a need to translate the key language of the LURP to the broader community when looking to develop the Plan, so that there will be true consultation and collaboration. Another submitter stated that there is a need to ensure a high level of discussion, collaboration and community participation in nuts and bolts issues, as well as the process and time—need to be good. Another stated, do not let LURP get in the way of the East’s vision—empower it.

Response 27. SD: Provide proposed District Plan provisions to the CER Minister that enable comprehensive residential and mixed use developments in existing areas... (32)

LIKED ASPECTS

A number of submitters supported this Response and gave suggestions for improvement. A few submitters commented that they liked the focus on mixed use, intensity, dwelling size and price, highlighting the urgent need for affordable housing.

A few submitters commented that there is an urgent need to enable residential development within the existing urban fringes, and one submitter suggested that land located between two green-field priority areas immediately outside the 50dBA would provide for this.

Te Hapu o Ngati Wheke Incorporated strongly supported R27 and the focus on future housing development in Rapaki and Tuahiwi.

DISLIKED ASPECTS

Few dislike submissions were made, two of which made no comment as to why.

Two submitters commented on the uncertainty of the floating zone scenario for land owners, and raised the fact that floating zones had little success in Auckland. Another commented a lack of understanding of what floating zone means.

There were two other comments - dislike the increase of greenfield development in Rolleston (East Maddison Road to Goulds Road) and that SDC has already locked in future development through the OPD process and Plan Change 7.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A few submitters supported the floating zone but suggested that in order for it to be successful it needs to provide as much certainty and clarity as possible for developers, and enable higher densities. Housing New Zealand support the floating zone concept, and the intent of R27, but suggested that the provisions need to be clearer and better defined, and more emphasis on mixed density housing. They also made the following suggestions:

The 'floating zone' could apply urban design guidance similar to the Wellington District Plan statutory residential design guide. Greater detail on how the floating zone is going to be created and how it will work would be useful

Housing New Zealand suggested a floating Comprehensive Development Zone to be included in the District Plans which responds to the priorities identified in LURP and help facilitate their Canterbury Investment Plan, they consider this to be an essential response for built environment recovery. Attachments were provided to explain this concept further, including; advice on the rational of the proposed criteria or 'conditions' that would need to be met for application of the Comprehensive Development Zone, draft application criteria for the proposed 'Comprehensive Development Zone' and the development controls that would apply for development on sites, a detailed example of the application of the Comprehensive Development Zone criteria and the proposed development controls for three sites within the inner suburban Christchurch area, perspective views of development compliant with the Rules proposed and delivering to the specified design outcomes.

Canterbury District Health Board suggested that the LURP specifically requires environmental issues on brownfields to be mitigated prior to development.

Te Hapu o Ngati Wheke Incorporated suggested that consultation with landowners in MR875 should occur.

The remaining submissions were single issue comments: like re-development of brownfields for affordable housing and want to see intensifications of areas like Spreydon and other inner suburbs allowed; ensure that the provisions are clear and provides certainty; residential density build up should be allowed in the rail corridor to enable a car-free lifestyle; provisions provide an excellent opportunity to work with and co-ordinate development which may have otherwise been difficult.

One submitter thought a benefit of this Response was:

Any opportunity to get at some kiwis to consider housing other than the ¼ acre dream is great. Mixed use keeps people within business areas 24/7 which has proven to create greater safety and social cohesion, and reduce travel costs

OTHER COMMENTS

One submitter questioned the floating zone, what is it, how will it provide certainty to the public and developers, is it only for re-development, and a suggestion that a time for public consultation and comment should be included in the six month period prior to delivery to the CER Minister. The submitter commented that they support the focus on residential and mixed use development.

Response 28. Promote cost effective and innovative design, construction and development solutions to enable and support rebuilding (52)

LIKED ASPECTS

Many submitters liked this response and many stated that they liked the focus on sustainability. Energy efficiency and rainwater retention were suggested as key areas to develop. One specific opportunity was identified:

Work with land owners in Cranford basin to achieve solutions with business land, residential land work and play. Solve roading problems. Solve storm water problems for the greater catchment area.

Two submitters commented that there is an urgent need for an increase in affordable mixed sized housing in affordable locations.

DISLIKED ASPECTS

There were few submissions that disliked aspects of this response. Two submitters commented that there needs to be more of a focus on sustainability (e.g. technologies) and environmental protection.

The remaining submissions were single issues: the use of 'promote' is too weak and needs statutory teeth; may require changes to the Building Act to make possible; needs to be affordable locations (e.g. Linwood, Aranui) and include local parks and green space.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters commented that green-tech (e.g. rain water retention, solar heating, and water storage) should be required not promoted.

Two submitters suggested subsidies for sustainable house design (e.g. solar panels, grey water systems).

The remaining submissions were single issues: suggested highlighting lifetime/universal design concepts; consider repaying of subsidies over time; development areas need to have the distribution network designed in a way that supports the provisions from inception rather than have it forced upon it later on; need to work with landowners

in Cranford Basin to achieve solutions and solve water problems for the greater catchment area; development of Council/ Government land (as suggested in R21) should promote cost effective innovative design and achieve a certain green star rating.

OTHER COMMENTS

Sustainable Otautahi suggested a text change; that R28 be re-worded to require or expect innovative, energy efficient and socially constructive development solutions. They provided examples of these in the submission.

The Human Rights Commission commented that the promotion of good design (along with Responses 19,21,22,23 and 26) all have merit for possible inclusion in a housing recovery action plan.

Two submitters commented that incentivisation is needed to ensure and promote innovation and cost efficiency.

The remaining submission were single issue, in general largely about sustainability: it must be done in a way that uses as little fossil fuel as possible; affordable and accessible medium density housing that is warm and healthy, and close to public transport; life cycle costing, life time and universal design planning important especially for our aging population; more terraced units; how will the District Plan support CSHWP [direct quote from submitter] and will it become just another design guide; the use of promote is not strong enough, should be required or be mandated by legislation; faster plan changes needed.

Response 29. SD: Review and, where necessary, amend District Plan policies and rules to provide housing options on historic Maori Reservations, particularly MR873 (Tahiwi)... (47)

LIKED ASPECTS

The Human Rights Commission strongly approved of using the LURP to ensure policies and plans are developed to reflect Maori relationship with the land.

Two submitters commented that there is an urgent need to increase affordable housing choices in general.

The remaining comments were that this needs to occur as a matter of urgency; Ngai Tahu needs to have an input; and that this SD is a must to enable Maori to build on their own land.

DISLIKED ASPECTS

Two submitters commented that it needs to be made clear that this response just relates to Maori land and is not intended to facilitate another commuter suburb across the entirety of the 1000ha reserve.

One comment in regard to Maori and the District Plan stated that you cannot arbitrarily disenfranchise Maori by imposing a District Plan on them.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The All of Government submission suggested that the provision needs to acknowledge the role Ngai Tahu will have in the delivery of this Response.

The remaining submissions were single issue: all land owners need to be treated equally; amendments should be made by agreement with Ngai Tahu only; the plan change needs to include both general land and Maori free hold land owned by Maori inside the reserve; flats or homes for Kaumatua would be good; inclusion of Koukourarata and Onuku.

Te Hapu o Ngati Wheke Incorporation recommended consultation between ECan , CCC and landowners in MR875 for development options in MR875 (Rapaki), and Mana Waitaha Trust, ECan and WDC in MR873 (Tuahiwi).

The Human Rights Commission acknowledged that Ngati Tuahuriri were involved with the drafting of the amendments of the rules regarding MR873 in the WDP and recommend the same is done to draft rules for MR875.

OTHER COMMENTS

A significant amount of comment was made in the Hui on Thursday the 4th of April on this Response. The majority of the comments raised concern over the number of sections (for Tuahiwi) suggested in the proposed change to the Waimakariri District Plan. Participants wanted to know why the number 300 had been decided on, and not 1300 (like a similar area in Woodend) or 2000 (like a similar sized area in Kaiapoi), or the 1000 that had been discussed in a meeting with the Mayor.

The participants also raised concern over the validity of the consultation processes that had occurred and will occur in the future, and the timeframe for development. Clarification was sought over the LURP process and the Waimakariri District Plan change process in the Hui. Comments were also made that referred to not building on the Urupa (burial ground).

The Mana Waitaha Charitable Trusts provided six documents as attachments to their submission. The documents included a Structure Plan for a Maori village, a number of proposed changes to the Waimakariri District Plan regarding MR 873, and a submission on the proposed changes to the Waimakariri District Plan in regards to MR873.

Mahaanui Kurataiao Ltd acknowledge the efforts made to ensure that the LURP adequately recognises the importance of Maori land development issues. They did not make a submission for or against the proposed LURP, but instead want to ensure that Iwi Management Plans and policies are given effect to in land development proposals for Maori Land, and that appropriate consultation occurs prior to decisions being made by central or local government in regards to Maori Reserve land.

Response 30. SD: Review and, where necessary provide to the CER Minister, amended District Plan policies and rules to provide for housing options on historic Maori Reservations, particularly Maori Reservations 873 (Rapaki) ... (37)

LIKED ASPECTS

The Human Rights Commission commented that they strongly approve of using LURP as a mechanism to ensure that policies and rules are developed and implemented to reflect the relationship Maori have with the land and associated resources by providing housing options.

Te Hapu o Ngati Wheke Incorporation strongly supported R30 as long as spiritual wellbeing is also provided for.

The remaining submissions were single issue: Support R30 as long as Maori fund it themselves and not the taxpayer; the wider community needs to be involved (e.g. community boards and resident associations); this action needs to occur as a matter of urgency.

DISLIKED ASPECTS

A number of submitters commented on this response, a few specifically in regards to MR875 stating that the Urupa should not be zoned for living, as it is where their people go after death.

Antarupa is where we go after death, not to be zoned for living

The remaining submissions were single issue: Maori land should not be treated differently to non-Maori land; concern of Maori being disenfranchised by having a District Plan imposed on them.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A small number of submissions were provided in this area.

The All of Government submission suggest that the role Ngai Tahu will have in delivery of this response needs to be acknowledged.

The remaining submitters suggested: Ngai Tahu need to be in agreement; and all land owners need to be treated consistently.

OTHER COMMENTS

The comments directly below came from the Hui which took place on Thursday the 4th of April

A participant commented on MR875 (Rapaki) and the lack of safe land (in terms of rock fall) that is actually available for development. One of the remaining options for development is the Urupa, and that is not possible because Maori will not build on sacred burial sites. Multiple participants agreed with this comment. The participant also raised concern regarding the possibility of those who don't whakapapa to Rapaki being able to develop.

Another participant queried why only MR875 and MR873 were being discussed when there are other reserves such as Tokohara, Port Levy and Onuku; all Maori land should be zoned residential – because technically this is its status historically.

Other comments made by participants were: that R30 will allow more innovation, but need to ensure no unnecessary hurdles are put in place; that Rapaki residents need to work closely with planners to ensure policies and rules reflect what they want. Consultants need to be funded to work with Maori and; that Rapaki doesn't need planners, they have done most of the planning themselves in the past. Partition of land is a massive hurdle, the Tuawhenua Land Act needs to be addressed to free up land that is impacted by the Maori Land Court.

Te Hapu o Ngati Wheke Incorporation commented that development of MR875 will provide earthquake affected whanau with affordable housing options, and therefore it is of critical importance that the Rununga facilitate engagements with ECAN to address these matters.

Mahaanui Kurataiao Ltd commented that consultation with the local marae, community and landowners needs to occur before any decisions are made in regards to Maori Reserve land.

A submitter commented that current land use requirements under the RMA make subdividing and development difficult including minimum size requirements and development contributions, stating that Maori won't have money to pay them. The submitter commented that R30 will make it easier for him and his whanau to develop their land, but that consultation is vital that landowners in the Maori reserves are included in the deliberations process. The submitter comments that Rapaki should be treated equally and refers to the current situation where medium house density in Cass Bay is half of what is required at Rapaki.

Priority 7: Restore and enhance the quality and sustainability of housing areas (45)

OVERALL PRIORITY SUMMARY

- Many submitters commented on the need for innovative design and housing diversity in terms of size, affordability, intensity and mixed business/residential use.
- Many submissions across the board, but especially in Response 31, commented that the urban design guidelines are too weak and need to have more teeth to ensure a sustainable focus is maintained throughout and reflected in the rebuild. Submitters commented that regulations and incentives should be established for the incorporation of systems such as solar panels, grey water and rain water. Multiple submitters suggested a sustainable building code.
- The need for awareness of social implications of the rebuild was commented on a number of times. Multiple comments were made suggesting that KACs will be too business focused and not provide for the establishment of a sense of community. Walkable/cyclable communities connected by good public transport, with a mix of community facilities (not just parks) were suggested as ways to increase a sense of community.

LIKED ASPECTS

Two submitters commented that there should be a focus on diverse design, especially that which reflects New Zealand's cultural heritage.

Two submitters supported sustainable urban design guidance and suggested it could be stronger, with one submitter suggesting incentives for solar energy, grey-water storage, storm water storage and community green spaces.

The remaining comments varied: restrictions to prevent tilt slab buildings; good quality housing that is sympathetic to the existing environment and creates places for communities.

The Canterbury District Health Board were in support of particular aspects of this priority.

Support: the goals listed for the LURP, in particular those relating to innovative urban design, energy-efficient buildings, affordable housing and accessible and integrated transport networks.

DISLIKED ASPECTS

Few comments were provided in this section. Two submitters commented that too much is being spent on the proposed Southern Motorway and subsequent networks (e.g. sewerage).

A submitter commented that the timeframe for Rolleston Structure plan should be changed from 2028 to 2017.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters commented on the sustainable focus, raising concerns that it did not go far enough. They stated legislation, regulation and incentives are needed. Submitters suggested that a sustainable building code should be enforced, and encouraged incentives for better use of resources (e.g. solar panels, building materials, grey water systems, rain water collection) as this would also make for a more resilient Christchurch

Although this priority area is to "enhance the quality and sustainability of housing area" we feel the response of reviewing existing guidelines on urban design does not go far enough to create a mandate for sustainable design to be incorporated at the development level.

Two submitters commented on the need to have less car parking and encourage provisions for active, and public transport, especially in Rolleston and Rangiora.

Two submitters raised concern about where and when this activity would take place.

The remainder of the submissions were single issue: need to expand and incentivise P6 and P7; urban planning should be more focused on urban hubs which the submitter suggested would be more resilient and provide for stronger communities at KACs; power and telephone lines should be placed underground in redeveloped and greenfield developments.

OTHER COMMENTS

A number of submitters commented on the need for diverse and quality housing.

There is too little attention to how to encourage and promote more compact city and more housing choices and good urban design. There is huge potential for housing development that is warm, healthy and low cost within the city boundaries. Government should work with councils to achieve this.

A few submitters commented on the importance of taking into account social implications

Concentrating (as the LURP does) on malls, business and transport is seriously inadequate. Community facilities apart from housing, business and commerce are vital parts of the life of a community, and are part of the social commons

Two submitters commented on the need to make it easier to develop e.g. simplify the consent process, reduce development contributions, and create templates for individual consents.

Two submitters commented on transport infrastructure and the need to reduce dependency on cars.

Two submitters commented that houses in the red zone should be repaired, removing the need for expansion and maintaining the heart of the city.

The Cancer Society commented on the opportunity to improve health outcomes by promoting better and more sun wary urban design (e.g. through the inclusion of natural shade and shade cloths). Another submitter commented on the opportunity to improve health through building standards.

The remaining submissions covered single issues: limit suburban sprawl; no more concrete tilt slab like what is happening on Moorehouse Ave; more apartment style student accommodation; and support for zone change to Living Z, making more land available for displaced red zoned residents.

Response 31. Review existing guidance on urban design to ensure it provides clear and comprehensive guidance... (78)

LIKED ASPECTS

A few submitters commented that they support the need for greater attention to urban design. A few submitters also commented that the guidelines need to be strengthened to ensure corners cannot be cut, ensuring that 'business as usual' isn't continued with.

Two submitters commented on the need for the guidelines to be clear and comprehensive, with greater input from housing development and urban design sectors. Similarly, two submitters commented that clear direction should be given to developers in terms of best practice with regard to environmental and ecological factors.

The remaining comments were varied: make sure guidance is provided for not for profits as well as commercial developers; provide subsidies for future house designs; ensure subdivisions are efficient, sustainable and attractive.

DISLIKED ASPECTS

Few comments were provided in this section. Comments covered differing issues: review to ensure guide is comprehensive; guidance should be based on environmental sustainability; subjective opinions should not interfere with good design and economic solutions; need for flexibility; need for incentives and not just guidelines; good urban design should be low impact; the guidelines are frustrating.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

A number of submitters commented that the guidelines should be strengthened, suggesting that they need to be statutory or incentivised to ensure they occur. Housing New Zealand suggested the following.

We consider urban design guidance should ideally be a statutory requirement in District Plans. A good example of this approach is the Wellington District Plan Residential Design Guide which is working well to achieve high quality development. In particular we see Wellington's approach fitting well with the 'floating zone' concept in the draft LURP

A few submitters commented on the need to include community facilities, and not just parks (e.g. places of worship, community halls) and a key component is ease of access to the facilities (e.g. walkable).

A few submitters commented that the guidelines should have greater consideration of environmental sustainability, one submitter suggested offsetting development levies with green design.

Two submitters commented that the guidelines need to be reviewed to ensure they are clear and comprehensive.

Canterbury District Health Board recommend that it be invited to be involved in the development of the guidelines on urban design to ensure that principles of Crime Prevention Through Environmental Design (CPTED) and Health Promotion through Environmental Design are adopted.

The remaining submissions were single issue: more guidance to Council to reduce cost and complexity; allow Council input to design but don't make it compulsory; insure good urban design remains key; variety in housing and density; there should be a longer term view; and minimise risk for future generations.

OTHER COMMENTS

Many submitters commented that urban development needed to be mixed business and residential (rather than having KACs as suggested in the LURP), socially, environmentally and economically sustainable communities that are well connected and should not be more than 20min walking/cycling apart (neighbourhood village concept), and do not encourage urban sprawl.

The development of sustainable urban villages throughout Christchurch, both in the central city and wider urban area, rather than supporting urban sprawl on the peripheries of Christchurch and beyond. Effective connections between the various urban villages, the city centre and the transport network. The villages being built or rebuilt in Christchurch suburbs should be no more than a 20 minute walk from mixed use areas, rather than relying on Malls as the central community focus. Provision of good supporting environmental and social infrastructure, such as storm water, sewers, parks, community and health facilities for each village, as well as retail, commercial and business within easy walking/cycling distance.

Beautiful, innovative, diverse, medium density housing that is based within community villages within the existing city boundaries

Many submitters commented on the importance of easy proximity of access to green space and community facilities in the broader context e.g. sports and recreation facilities.

A few submitters commented that there is a need to recognise the importance of existing village communities so that they are an integral part of network developments.

A few submitters commented on the need to reduce future environmental risk e.g. flood management plans.

A few submitters commented that the guidelines need to be regulated; guidelines alone are not strong enough.

A few submitters commented on the need for good supporting infrastructure e.g. storm water, sewers, parks, health facilities- all within cycling distance.

The Childrens Commissioner commented on the importance of involving children and young people in urban design processes (and consultative processes more generally):

As an emerging international region, it is appropriate that the Greater Christchurch region focuses on the future and makes provision for it. Placing children and young people at the centre of policy and planning for the next generation requires forward-looking planning and socially and environmentally sustainable policies. Building toward a child-friendly community benefits all of society, not just the youngest generation, helping to 'future proof' the city and promotes vibrancy and a sense of community.

Recommendation 2: *I recommend that design assessments for all new public realm projects are undertaken to assess and consider the needs of children, particularly disabled children.*

The Children's Commissioner also recommended that the development of recreational areas and green, open spaces are given priority in urban planning and that partners of the LURP adopt a UNICEF Child-Friendly Cities framework as a way to achieve better outcomes for Greater Christchurch's children and young people.

One submitter commented that current zoning in Lyttelton is too restrictive and based on the character of Lyttelton before the earthquakes, and needs to be amended.

The remaining submissions were single issue: reduce current obstacles to inner city redevelopment; will the directions be guidance or rules, if the guidance becomes prescriptive it could result in less innovation; need to include churches in the plans; need for outline development plans for greenfield developments now; insurance is a big impediment to developers; social and affordable housing are different, need to assess the market and identify the vulnerable populations.

Priority 8: Identify and provide sufficient industrial, office and retail land (35)

OVERALL PRIORITY SUMMARY

- There were relatively few comments made on this section.
- There was overall support for KACs under the condition that they need to be reassessed (where they are and how they influence).
- A number of submitters agreed on the review of KACs proposed in Response 35 and sought for them to be defined in their extent and have supportive policy and frameworks in the other plans.
- Other issues were location of KACs, quality of urban living, restrictions of development and zoning issues.

LIKED ASPECTS

Three submitters were supportive of Priority 8. One of these stated that there is a need to trigger thresholds for office and retail activities in industrial areas, particularly where these activities exceed ancillary levels. One submitter liked the notion of the intention to release land to stop 'gouging money'. Two submitters agreed with the aspects of smaller sites and another submitter liked the mixed use concept.

One submitter approved but qualified that this Plan needs to take account of the location needs of different types of firms.

DISLIKED ASPECTS

LURP, according to one submitter, appears to simply reapply the KACs previously identified by strategic partners prior to the earthquakes [this idea is expanded on in Doing Things Differently]. Another submitter claimed that CERA's taking large areas of land within the 'Four Avenues' has inflated the price of remaining scarce land for dislocated businesses. One submitter suggested that there is no way to keep the same number of jobs in the CBD in view of size of reduction and height restriction on buildings.

One submitter was concerned that opening more new business and industrial zones on the outskirts of the city will exacerbate the urban decline of Christchurch that was already in place prior to the earthquakes, and states that connectivity amongst suburban centres by active transport corridors is necessary. Another submitter made a very specific comment about a vehicle business near the new health hub and retirement complex being a hazard.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Several submitters suggested that KACs be reassessed because of their importance to growth. Of these, one submitter suggested the need to see an assessment of KACs and other areas in relation to areas of damage and rebuild opportunities to support recovery, and their relative roles in relation to economic and community activity. Another submitter stated that LURP needs to facilitate action in key areas at a range of scales (sub-regional, local and neighbourhood), as well as, ensure appropriate relocation options in the future. Another submitter suggested the idea of a hierarchy for KACs, particularly in greenfield areas.

One submitter claimed that Rangiora is being held up by closed build-up [submitter's term], while another claimed that the government could provide seed funding to allow Council to take a lead and start a comprehensive development in town centres like Rangiora and Kaiapoi. One submitter was concerned that Figure 13 did not show Central City as an economic hot spot and requests more verification as to what this means. Two submitters were concerned about how 'working from home' has been factored in.

OTHER COMMENTS

One submitter suggested that the needs and rights of primary processing industries should be better protected and that the roles of CCC and ECAN are at cross purposes. One submitter stated that MPT [submitter only provided abbreviation] have made a decision to invest in rebuilding at their existing location and CCC and ECAN have provided positive feedback. Another submitter supported the inclusion of the land along the north side of Main South Road (being the properties 596-726 Main South Road) being identified as a LURP Business Priority Area (not yet zoned).

One submitter requested more options for small business to share land/buildings like the Epic project. Another claimed that \$80 billion new money over 10 years is coming to Christchurch. One submitter stated the number of overseas people in Christchurch for the rebuild will double from 10% to 20% in the next few years and there will be more need for sports and recreational facilities (rather than just drinking after work).

Response 32. SD: Amendment set out in R1 and District Plan amendments as set out in Appendix 4 for land at Southbrook (17)

LIKED ASPECTS

One submitter stated that this response helps with affordability. One submitter stated that the MPT support the insertion of a new chapter in the CRPS which includes priority areas for development, and specifically the land owned by MPT at Templeton. Supporting town centre planning already done e.g. Rangiora Town Centre Strategy, was liked by another submitter. One comment suggested the idea was great but with the exception of the WDC not protecting the process from money grabbers.

Another stated that they liked that 596-726 Main South Road can be developed for commercial/business purposes because of existing use and Council requirements already in place.

DISLIKED ASPECTS

No comments were made in this section.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Businesses should move out of residential areas according to one submitter. Another queried if high hazard flood risk had been ascertained.

OTHER COMMENTS

According to one submitter, '80% of young overseas perhaps now do not own cars but may share'. Another queried whether there was any management between the central city and KACs suburban centres' interactions. Another submitter suggested that some help is needed to get the town centres going e.g. Kaiapoi, Rangiora in the Waimakariri District, and that the other issues covered by the recovery plan are already in hand.

Response 33. SD: Develop and provide to the CER Minister Outline Development Plans for District Plans to establish the broad land-use pattern within selected priority areas for business... (16)

LIKED ASPECTS

One submitter stated - we support the proposed introduction of ODP in the District Plan as a matter of priority, particularly for CB1 at Belfast. They also stated that the broad land-use patterns and connectivity within ODPs provides certainty to all parties and enables better planning for development.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Support should be given to those who wish to redevelop old commercial areas which have been badly damaged, according to one submitter. Another stated that ODPs should focus on broad land use patterns and connectivity requirements, rather than matters of detail which are better managed through the subdivision and land use consent processes; and, rezoning of the land should occur at the same time as introduction of the ODP, so as to avoid unnecessary (and potentially onerous) time, cost and uncertainty.

One submitter highlighted that 'community' should be inserted between the landowner and developer aspirations; and, another stated that 'environmental sustainability' must be taken as a base requirement.

Response 34. SD: Provide proposed Greenfield business land-zoning provision to the CER minister in a manner that is aligned with the provision of core public and private infrastructure and linked to vacant industrial land monitoring (14)

LIKED ASPECTS

Two submitters stated that they liked this response without any further clarifications.

DISLIKED ASPECTS

Another gave a lengthy explanation of why deferring zoning (or equivalent) whilst awaiting infrastructure provision is unlikely to meet current or (near) future needs or be cost-effective for those owners and prospective occupiers of Greenfield business land who are otherwise able and willing to develop such land.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested reducing priority of greenfield to favour brownfield development and locate sites along transport network/main lines. Another suggested that this implies the need for stronger monitoring and reporting of business land availability and demand for both industrial and commercial activity and that this should be addressed clearly in LURP.

OTHER COMMENTS

One submitter requested that the scope of the statutory direction also include rezoning business greenfield land (to be completed within 9 months of approval of the LURP) rather than the longer timeframe for rezoning provided and that it needs to be amended to clarify that the rezoning applies to all of the Priority Greenfield Business Areas identified on Map A.

Another submitter stated that public infrastructure is essential to enable safe and efficient freight movement and that these requirements are built into the CCC City Plan now for the Greenfield LG Yaldhurst zone but are not being implemented; and, that some other system is therefore needed to ensure implementation such as a "prohibited activity" status to stop certain developers creating dangerous, congested and unplanned outcomes.

Response 35. Territorial authorities undertake reviews of commercial needs for business land and make provision for this need within existing centres and Key Activity Centres as appropriate (37)

LIKED ASPECTS

A number of submitters agreed that there is a need to review the KACs and define their extent and to incorporate supportive policy and rule frameworks into the City and District Plans. Within these submissions it was also suggested that it should be recognised that some KACs take in several centres and that the review should be wider in scope e.g. a variation 86 approach and hierarchy was suggested. Another submission stressed the need for

monitoring to ensure the delivery of the outcome and another stipulated that Council should not sell off ratepayer assets and facilities unless there is a need to service the community better.

DISLIKED ASPECTS

Two submitters queried the need for territorial authorities to undertake the review and one stated that the response is vague and gives power to people to overcome existing zoning, plans, and RMA requirements. There was also doubt expressed that TA's would be able to do this accurately.

Single submissions stated: concern for having businesses in residential areas; that not all business development is going to fit in KACs as identified; disliked the role of smaller B2 and B1 zones and disliked as it would prevent West Melton businesses from expanding.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested there is a need for detailed description, parameters of growth, role of residential, designation for brownfield, urban design information and a description of the relationship with central city for KACs.

Single submissions made these comments: the need for clarity; refinement from PC1 with a hierarchy and relocation allowances of undersized KACs e.g. Halswell; creating a "Centres Policy" on how KACs link together; and the need for stronger monitoring and reporting to be addressed clearly in the LURP. Two final suggestions were for the need for temporary business locations whilst premises are under repair, as well as, the need to focus on industrial and not just centres and KACs.

OTHER COMMENTS

There were a few single submissions suggesting that CERA review the quality of these reports; a call for a better understanding of the relationship between the distribution of industrial and commercial activity and retail; and a need for a good mix of housing, office and retail in the same building and not just in industrial parks.

One submitter was concerned about CCC's commercial strategy and noted that KACs have developed outside KACs (e.g. Merivale) and that KACs policy needs freshening up, noting that small business is not able to get space in commercial places. Another suggested that there be a review/reflection on the cost of rent for new builds as a result of earthquakes.

Another suggested a neighbour centre development in South East Rolleston. It was queried in one submission whether a KAC will or should be a tool to regenerate the eastern part of Christchurch, or should there be managed decline.

Priority 9: Ensure business land makes best use of resources and infrastructure and delivers attractive business premises and urban environments (24)

OVERALL PRIORITY SUMMARY

- There were relatively few comments made in this section. Overall this Priority and its Responses were generally liked, for various different reasons. Submitters particularly liked the attention to Master Plans in Response 37.
- There was support for Responses 38, 39, 40 and 41, with few dislike and suggestions for doing things differently comments made.
- The inclusion of travel plans and encouragement of rail were commented on by a few people, particularly in Response 39.
- Encouraging public and active transport were common across the board.

LIKED ASPECTS

A number of submitters supported this Priority, stating: IZONE development as forward thinking and a very positive message; the capacity to enable each “village” within the city to develop and evolve a distinct character e.g. Akaroa urban design advisory panel; and the enablement of local experts/people to influence the design guidelines for suburban centres as in Seattle local boards as all very positive.

One submitter stated support for businesses near residential areas and in prime sites, where people might actually want to go to.

One submission stated that it is more important that CCC commits to funding public realm enhancement.

DISLIKED ASPECTS

One submitter suggested developing small neighbourhood centres in Rolleston, especially South-East near East Maddison Road between Howes and Gould.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter expressed a need to set priorities for development, in keeping with the existing infrastructure, and to make some areas lower priority, i.e. E/SE of Halswell, which needs a new sewer line, but the proposal date for this is as late as 2021.

Another submitter suggested more planning for business zones’ public shared places and sites, and that ‘the ugly car park at the KAC in Halswell’ is what happens when planning is left to an unorganised group of businesses.

Another submitter suggested providing for accessibility of mobility impaired people in all comprehensive commercial and town centre developments.

OTHER COMMENTS

According to one submission, if the concern for industrial regeneration is around potential adverse distributional effects on existing centres then this should be explicitly stated, thereby enabling brownfield regeneration where significant distributional effect are able to be avoided.

One submitter requested that business land makes best use of resources and infrastructure; another queried what ECan will do to improve access/entrance for fire rescue services to the expanded area and what is Historic Places Trust’s situation within the plan?

Single issue submissions included: that the Council should lead by their direction; co-locating housing and business; that public facilities need to be located, planned and accessible.

Response 36. SD: Provide proposed District Plan provisions to the CER Minister that enable comprehensive developments in existing urban business areas, including Brownfield sites on the basis of their size and location (17)

LIKED ASPECTS

There were seven submitters who stated they liked this response. One expanded by stating that there is a need for section size variety for start-up businesses.

DISLIKED ASPECTS

Two submitters stated general dislike, with one simply stating 'why'? The other stated that this should not be statutory and to leave it to democratically responsible Councils.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

In the All of Government submission the time-frame proposed was queried, and recommended that if possible this should be undertaken sooner. A single submitter suggested to take a look at the 'kick strategy' regeneration of low intensity industrial areas that needs to be public sector led. Another submitter, responding to the previous suggestion, agreed and stated that this should be a priority for T2 and T3 areas of the East.

OTHER COMMENTS

One submitter suggested CERA facilitate interventions. Another suggested that mixed use for existing urban business areas should be made more liveable.

Response 37. SD: Councils to review and consult with affected communities on possible changes to district plans to give effect to the approved CCC Suburban Centre Masterplans, WDC development plans and SDC town centre Masterplans and to subsequently provide agreed changes to the CER Minister (23)

LIKED ASPECTS

There were eight submitters who generally liked this Response. Two long letter submissions specifically identified the Edgware Plan; the NZCW called for the support of the Edgware Plan, and another commented that mechanisms and powers may be needed to enable the ability for site amalgamation to occur within the Edgware Centre, to support the implementation of the Master Plan.

One submitter suggested that to enable the ability of site amalgamation to occur, site specific intervention (compulsory land purchase by CERA) may be in order to deliver the objectives of the respective Master Plans.

DISLIKED ASPECTS

There were three submitters with complaints about the SDC in relationship to planning implementation. One stated that Selwyn does not listen to their community; two others stated the Rolleston Structure Plan has been disregarded and that the process requested by the minister has not been followed in Rolleston by SDC. There were two other dislikes, one simply stated 'why?' The other stated that this should not be statutory.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The All of Government submission reemphasised that the key role for the LURP is to help inform the location and provision of service delivery, and that the recently developed suburban Master Plans need to be enabled through measures under the LURP and progressed in partnership with communities and the private sector at this time.

Another submission suggested that ECan and CERA should take the lead in the strategic planning of KACs; that city and district councils should follow with statutory planning map amendments according to an ECAN/CERA timeframe; and that a separate section needs to be created within the draft LURP Plan to give priority to KACs.

Additionally, there were suggestions by single submitters to enhance the neighbourhood village concept; have Councils review and consult with affected communities on possible changes and to monitor TAs. Two submitters stated that the Master Plans should consider residential, as well as business, along with the need for green space and amenities to create more meaningful and effective results.

OTHER COMMENTS

Elliot Sinclair stated

...the thrust is consultation in business land with the public within the six month timeframe specified, but this is not consistent as it is not carried over with a requirement for consultation regarding change to residential areas. Otherwise we generally support this response.

Response 38. Support existing case management approach by Councils and the Canterbury Development Corporation and develop new approaches to collaboratively investigate comprehensive development planning... (29)

LIKED ASPECTS

Many positive responses emphasised regeneration of industrial areas. One submitter stated the need for case management to facilitate comprehensive development planning for damaged business areas including the B4/B5 land in Woolston and several others stated the need for case management for KACs. One submitter stated that industrial brownfield areas need to allow for retail and offices as this is easier than KACs and that brownfield use for anything other than residential conflicts with the proposed RPS.

Two submitters liked this response, but query what support there will be with Recover Canterbury dissolving and what is the position of Historic Places Trust within the development procedure?

Two submitters were very supportive of the support for local businesses wherein one response highlighted that 75% of NZ businesses are small businesses.

DISLIKED ASPECTS

There were five submitters who generally disliked the Response. One stated that it is better to let the market resolve and force TAs to work around that. Another suggested that there is sweeping language in the Plan that will override Councils if Council decides not to give land to a developer. One submitter stated that the CCC suburban centre Master Plans are too limited by focusing on business and there is a need to integrate more with social and community needs. Another submitter stated that, eastern 'cold spots' should be presented as opportunities for rectification and seeding projects that will lead to build up of the East again.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The All of Government submission, as well as one other submitter stated that they support the existing management approach by councils. The All of Government submission also suggested that LURP could more clearly distinguish the respective roles of councils and CERA.

One submitter made the suggestion to empower the Council chairperson of the various projects. Another emphasised the need to consider transport networks to service growth in Bromley and Woolston, as well as, increase usage of ring road as a preferred link to Lyttleton. One submitter simply said to take this Response out.

OTHER COMMENTS

There were a number of requests: rezoning of the corner of Waterloo and Racecourse Roads to business; fix the bridge of remembrance so that pedestrians can access Cashel Mall; overcome barriers to community led development; that insurance companies are irrelevant; Master Plans are great on paper, but not workable without CCC/CERA intervention into industry loss, employment loss, Greenfield in East, slow Geotech processes; small business in living zones—need to change zoning as these are functioning well and will not go back to “Commercial”.

Response 39. Investigate opportunities to introduce a range of transport efficiency initiatives that would support the rejuvenation of commercial areas and hubs to enhance their economic performance and amenity...(29)

LIKED ASPECTS

There were a number of submitters who supported the inclusion of travel plans to rejuvenate commercial areas and hubs. One submitter mentioned the IZONE, but would like it to use more rail. Another mentioned that park n’ ride options would be good for commuters and another queried whether integrating business and transport was strong enough in the Plan.

DISLIKED ASPECTS

Two submitters opposed this Response; one suggested to upgrade Rolleston rail station as a leading transport hub for the future. The other suggested to put a road between Dunns Crossing Road and East Maddison to improve connectivity to East Maddison, Selwyn, Springston, and Lincoln traffic.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

There was a recommendation to broaden travel within the LURP to specifically include active and public transport incentives. Several submissions encouraged rail with one specific request for a commuter train and upgrade facility at Rolleston; a bike trail next to the rail line (Rolleston to Hornby) for safe cycle to work; limit amount of car parks on future plans; and to encourage walkable communities.

OTHER COMMENTS

There was one long letter submission from Colin Stokes stating how important public infrastructure is, and that these requirements, though built into the CCC City Plan now for the new Greenfield LG Yaldhurst zone are not being implemented and some other system is therefore needed.

One comment was simply to live, work and play, please.

Response 40. Review provision in District Plan to ensure business activities are located in appropriate zones (19)

Liked Aspects

A number of submitters responded positively with single comments being: good planning gets good results for communities; avoid inappropriate locations; needs to be stronger to support planners to *decline* business in living zones etc.; needed to ensure an efficient urban form and transport pattern; and, needs to cater for those working from home.

DISLIKED ASPECTS

One submitter stated that retail areas are disjointed with roads in-between, making it hard for mothers with children to shop. Another submitter commented that West Melton has no provision for business activities despite existing activities and population growth.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter stated it is not clear what this response is seeking to address and if it is about firms relocating back to suitable areas from various temporary locations, including residential areas—clarify and specify.

Business currently relocated to residential areas need some standard of safety, etc. without impending requirement like fire safety, sprinklers e.g., \$10,000 to \$100,00.

OTHER COMMENTS

South Horticulture expressed concern that such a review will have the effect of prohibiting rural based industrial activities from operating within the rural area. One submitter suggested that residents should get to decide whether business in residential areas goes or stays. Another sought to minimise the impacts of small, low impact businesses currently operating in residential zones.

One submitter raised questions surrounding home based occupation.

Home based occupation –previously in CCP as 1-% of GFA of all buildings. OIC Temp Accom now provides ability to have business activity in Living areas. Should the CCP be amended to reflect the now established low/minor effects of re established businesses to permit 36m2 (i.e. standard garage space) of business use in living zones? Or should we lick out these temp activities and make them re-establish in Business zones?

Response 41. Develop a comprehensive Brownfield business land incentives package that balances central Christchurch revitalisation initiatives with the objective of also facilitating the development of underutilised land elsewhere across greater Christchurch...(26)

LIKED ASPECTS

Many submitters were in agreement with the use of incentives, mechanisms and powers to unlocking the reuse of commercial brownfield land. One submitter suggested incentives could be for a finite period and/or could include waiving resource consent fees.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested that businesses can lead provisions for cycling, more public/active transport and parking; and another sought less parking rather than more, as well as, smarter (underground, etc.).

One submitter suggested providing expert advice; and another requested clarity about the incentivising renewal in the “economic cool spots” in the East of Christchurch.

OTHER COMMENTS

One long letter submission suggested a second figure showing priority brownfield business land be developed that is based on the ‘economic cool spots’ figure, as it is these areas where there are greatest opportunities (and need) for business redevelopment.

One submitter stated high impact businesses should be kept away from places where people frequent and live.

Priority 10: Maintain and enhance access for key freight movements (29)

OVERALL PRIORITY SUMMARY

- There were relatively few comments made in this section.
- There was a similar level of like and dislike Priority comments overall.
- Maintaining fuel chains was identified as an important consideration.
- There were a number of comments on Evans Pass Road in Response 43 with BP and the Lyttelton Port Company commenting on the need for a resilient transport route, one that takes into account growth of suburbs, long term economic development, reverse sensitivity issues and that road access is re-instated to a higher resilient standard.
- The need for consideration of non-freight users of the related roads was also discussed with regard to walking and cycling user needs.

LIKED ASPECTS

The Lyttelton Port of Christchurch provided their support for this Priority. They specifically liked the statement recognising the importance of the Port as part of the strategic infrastructure of Christchurch. They also supported the statements in the LURP that focuses on maintaining and enhancing access for key freight movements.

New Zealand Limited and Z Energy Limited commented on the importance of the airport and the Lyttelton Port for tourism, the economy and successful transport of goods. They specifically supported R43,44,45 and 46.

Maintain and enhance access for key freight movements. Delivery of infrastructure and transport networks and hubs to support the priority areas is a key matter to be dealt with in the draft Land Use Recovery Plan and is consistent with the Recovery Strategy goal of developing a transport system that meets the changing needs of people and businesses during recovery. Access for freight movements must be integrated with the development of urban areas.

One submitter supported the priority and suggested the need to consider pedestrians when enhancing the current freight ways.

One submitter supported the priority for its approach to comprehensive development. The submitter suggested more meaning is needed for process, scale, type size etc.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Fuel supply chains are suggested by one submitter to be of critical importance to this priority and need to be included in the LURP. The submitter recognised that the LURP has considered energy resources but they are not specifically addressed. The submitter suggested making an amendment to R44 to include this.

R44A Ensuring the fuel supply chain to the greater Christchurch area is as resilient as possible and that there are safe, efficient, effective and sustainable alternatives transport routes available.

Three submitters suggested that the Priority should include passengers and rail. One submitter suggested freight at the airport should include passengers as the current modal facility needs improvement. One submitter suggested integrating with public transport infrastructure, specifically the Diamond Harbour Ferry and Lyttelton bus routes.

One submitter commented on concerns that the development may be at the cost of local community aspirations for access to inner harbour waterfront and revitalisation of Norwich Quay and Lyttelton town centre.

OTHER COMMENTS

A new bridge on the Waimakariri was suggested by two submitters; suggested to be located up stream behind the airport to Rolleston.

Southern Horticultural Products Ltd expressed their concern on the effect the Priority will have on their business success and viability.

The utilisation of the railway network for public transport was suggested by one submitter. They highlighted the potential for the transport system to match suburban development as well as the construction of a cycleway.

Resources mean you are using it. We have a rail way network setup yet there are no provisions to use it (for passenger traffic in the future).

Response 42. SD: Amendment set out in R1 (11)

LIKED ASPECTS

There were only a few comments made in this section of this Response. The Lyttelton Port Company, Eliot Sinclair and three other submitters provided general support for this response.

DISLIKED ASPECTS

One submitter suggested the response should not be a statutory direction. The submitter suggested that the response should be left to the councils and districts who are democratically responsible.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested arterial routes needed to be specified and another sought no blocking traffic on Brougham Street.

OTHER COMMENTS

Building roads to last was suggested by one submitter.

Response 43. Ensure Sumner Road/ Evans Pass Road is available for oversize and hazardous good and for general traffic (26)

LIKED ASPECTS

Six submitters provided general support for this Response.

One submitter commented that the Response needs to take into account of the ability of the roads through Sumner and surrounding areas.

Another submitter, who liked the response, commented that the LURP needed to be clear about how Sumner Road/Evans Pass intended to make roads safe and secure, and would like to know the timeframes of these repairs.

One submitter expressed their support for the response, as the community of Lyttelton Harbour were unhappy about the current oversize freight using Gebbies Pass.

One submitter expressed their support and suggested provision must be made for a head to head coastal walkway as part of the development.

DISLIKED ASPECTS

Three submitters disliked the response. One submitter thought it was not necessary and thought it would be great for Sumner if roads were only fit for cycling. They believed that access would be by the same route traffic currently takes.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Three submitters commented on their concern for hazardous rockfall. It was stated that freight companies would be hesitant to use the routes and that it was requested that the road be reinstated to higher more resilient standard.

BP New Zealand Limited and Z Energy Limited indicated disappointment that the road would only be reinstated to pre-earthquake standard and they stated that they think that this leaves access vulnerable to another event. BP stated that they would be reluctant to use the route until it is upgraded and think that with growth in Sumner's population over time there would be increased reverse sensitivity.

The Lyttelton Port Company commented on making amendments to the current response, as follows;

Ensure Sumner Road / Evans Pass Road is available for oversize and hazardous goods and for general traffic and is reopened to a level that ensures it is a resilient route to enable operation as a lifeline.

One submitter suggested the response to be prioritised earlier.

One submitter suggested the rebuild will require importing oversize loads. If Evans pass is not available, cost and rebuild time will increase.

Inclusion of provision for integrated use by cyclists and pedestrians were suggested by two submitters.

OTHER COMMENTS

BP and Z Energy stated in their submission.

The Companies note that the closure of the Evans Pass (alternative transport route from the Port prior to the earthquake), has resulted in the Companies reviewing their options.

The Lyttelton Port Company commented on the importance of the resilience of the proposed new route to economic growth.

... the closure of Sumner Road since the February 2011 earthquakes has had a significant ongoing impact on the region ' s earthquake recovery and long term economic growth and transport network resilience. The Lyttelton tunnel is the only freight route to and from the Port, therefore access to the Port is vulnerable in the event of closure of the tunnel, for example, in the event of fire. Reopening this Road, as the key alternative freight route to the Port, is therefore critical for the earthquake recovery and long term economic development.

...It is important that Sumner Road becomes a resilient transport route with a high level of service in order to capture the long term economic and transport system benefits as a result of the high freight growth. The GCTS outlines a 417% increase in containerised freight to and from the port, which includes a large component of goods that would have used Sumner Road prior its closure.

In contrast, one submitter commented on the Summit Road Protection Act and opposition to truck movements.

Be aware of the Summit Road Protection Act—yes, don't want too many trucks disturbing people trying to get away from it all in the natural environment of the hills.

Response 44. Develop a “Lyttelton Access Statement” that balances freight access with community needs (18)

LIKED ASPECTS

Nine submitters were in general support of this Response. One submitter commented on the Response by saying that they will support it if the local community is involved in the development.

The Lyttelton Port Company stated.

The LURP recognises the importance of key freight routes, such as Sumner Road. For example:

28.1 LPC supports the inclusion of Figure 14 (page 48 of the LURP) which details the key transport priority for recovery (and is taken from the GCTS).

28.2 Further, Priority 10 identified in the LURP is to “Maintain and enhance access for key freight movements” and the Responses 42 – 46 listed under this priority heading seek to respond to this priority.

One submitter commented that they support freight off Norwich Quay and enhanced access to Lyttelton inner harbour waterfront, but the local community should be involved in talks.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested access should be to all ports, not exclusively Lyttelton.

To achieve the response, one submitter suggested that local community representatives need to be involved in developing the access statement as they’re not involved currently.

OTHER COMMENTS

One submitter commented Lyttelton Harbour is a beautiful place and an economic hub. Recreational access should be greatly improved and secured.

Response 45. Ensure strategic freight projects support distribution and servicing needs of business to, from and within greater Christchurch, while managing the effects on local communities (16)

LIKED ASPECTS

The Lyttelton Port Company supported the response in regards to the recognition of key freight routes.

One submitter commented on their support of the Response, specifically if it applied to the Diamond Harbour ferry terminal being improved.

Two submitters had general support for the response. One submitter commented on their support for hubs/spokes (Port/Airport) being the foci with rail/major arterial roads joining them.

SUGGESTION FOR DOING THINGS DIFFERENTLY

Two submitters suggested doing the response differently.

One submitter suggested looking at addressing the Lyttelton tunnel early on in the process for improved freight transport. The submitter also suggested doubling the rail tracks or upgrading infrastructure so the trains could be faster.

OTHER COMMENTS

The Lyttelton Port Company commented that it is particularly interested in the LURP where it mentions the importance of the Lyttelton Port as strategic infrastructure.

Two submitters commented on the importance for inclusion of public infrastructure with freight movement. One submitter suggested this has already been included in plans for Yaldhurst but have not been implemented. The submitter suggested a new system is needed for implementation activity to ensure TAs don't have behind closed door deals with certain developers.

Public Infrastructure is essential to enable safe and efficient freight movement as well as public and private transport and pedestrian activities in association with it.

Two submitters suggested increasing business centres in other areas to decrease congestion at Lyttelton. One submitter commented on rezoning the land centre of Rolleston to Business 2; the land has potential use for a container depot and transport facility that would help prevent congestion of the Lyttelton Port.

Single issue submissions included: concern in regards to the cost of transporting over-size loads through Gebbies Pass to Lyttelton (especially large steel and aggregate); extra traffic in Rangiora will create more congestion.

Response 46. Undertake an assessment of inter-modal freight needs which identifies preferred locations, as appropriate, for any additional freight facilities required to enhance capacity and maximise the efficiency of the freight network... (17)

LIKED ASPECTS

Five submitters were in general support of the response.

Three submitters supported the response and suggested spending more time and money on investigating putting more freight onto existing rail networks and getting trucks off roads.

One submitter supported the use of freight hubs but suggested that housing and community needs for employees needed to be taken into consideration to minimise travel.

The All of Government submission supported this response but stated the need to identify subsequent actions following the assessment.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested connecting the inland Port by Hornby to the motorway and rail lines.

OTHER COMMENTS

One submitter suggested rail access at Rolleston is important, as a specific action under this Response.

4. Other plan sections: Key legislative

changes; Regional Policy Statement; CCC, SDC and WDC Plan changes

Key Legislative Change discussion

This section is a discussion of comments that were made on the Key Legislative Change section of the Plan (page 59). This section was identified as a key area for comment in the Workshops and participants were asked to make comments on these four aspects of the Plan. A small number of submitters commented on the key legislative changes.

Streamline the Christchurch City Plan

LIKED ASPECTS

One submitter commented that impediments (emplaced by local authorities) need to be removed to encourage development and to reduce population loss.

One submitter commented that certainty is needed along with streamlining and this should be extended to SDC and WDC. Whilst another submitter questioned if this process needed to occur now.

Another submitter commented that community involvement needs to be ensured, and that Banks Peninsula landscape has been degraded by rural residential development.

DISLIKED ASPECTS

Three submitters raised concerns that streamlining the process may lead to vital processes (such as community consultation/public participation) being missed causing detriment to the environment and society, and cheapening the democratic process by giving more power to officials.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested that democracy needs to be ensured with any legislative changes. Another submitter suggested that anything to speed up the process would be beneficial.

OTHER COMMENTS

Two submitters suggested relief for those who took the Minister to court over Plan Change One.

Two submitters commented that there is currently too much democracy in the process which in turn is blocking development when there is plenty of land available.

One submitter commented that WDC and SDC plans need to be streamlined at the same time.

One submitter suggested that it is very important that mixed use residential/light business is incorporated or expanded into existing residential or greenfield areas.

One submitter commented that there should be a national template so that all the plans (CCC, WDC and SDC) align specifically on matters such as noise standards and hours of operation.

Create an Urban Development Agency upon the expiration of the CERA

LIKED ASPECTS

A few submitters commented that UDA is a good idea but needs to work with local authorities to deliver outcomes.

One submitter suggested a land banking agency that supports rebuild of communities.

A further three submitters agreed with the creation of an agency, whilst one suggested caution is needed and democracy essential, and another agreed strongly as they don't believe CERA will have achieved all its work by 2016.

DISLIKED ASPECTS

Two submitters queried if this will mean continued central government interference in local issues.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

Two submitters suggested that the agency will need to be integrative with input from different professions including the private sector.

One submitter suggested zoning changes to allow appropriate land release, whilst another suggested zoning changes in suburbs to allow for intensification.

One submitter suggested that the development restriction in Selwyn (until 2028) be removed.

One submitter raised concern that it would be just another agency, and suggested there could be one already that could do the job.

OTHER COMMENTS

One submitter commented that local councils need more power, whilst another submitter commented that they have too much power and are restricting development, especially by blocking a plan change to remove the 2028 development restriction.

One submitter suggested regeneration is needed and brownfield development, particularly in the East.

One submitter suggested that a similar arrangement worked well in Hong Kong.

Enable authorities to set time-bound conditions on consents

LIKED ASPECTS

Three submitters agreed, with one commenting that it would save developers gobbling up land and sitting on it.

DISLIKED ASPECTS

Two submitters suggested it would be difficult to achieve and would slow down the process, with one of the submitters also suggesting CCC needs to be productive not reactive.

One submitter suggested it is not practical and that councils should incentivise development and another commented that development just needs to get done.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

One submitter suggested that taxation rules need to change to encourage land banking.

Another submitter suggested that more discussion is needed.

OTHER COMMENTS

One submitter commented that a sustainability mechanism needs to be retained.

Another submitter queried how the legislative change 'sunset clause' will work. Time bound consents may fall over because developers may deliver but council may fail to provide infrastructure.

Amendments to other legislation

LIKED ASPECTS

One submitter supported the investigation into developer-related restrictive covenants, and another submitter suggested that there is a need for a cooperative housing legislator.

SUGGESTIONS FOR DOING THINGS DIFFERENTLY

The Canterbury District Health Board recommend that provisions are made within covenants that provide for a range of section sizes, relocation of houses into subdivisions and allow the use of sustainable building materials.

One submitter commented on the need for the compulsory requirement for rain water harvesting for business and another for a wind turbine for Rolleston.

Single issue comments were: cooperatives and non-profits need to be included as possible corporate structures; resource consent hearings aren't needed unless there are three objectors; amending KACs in the RPS to provide flexibility.

OTHER COMMENTS

Three submitters commented on covenants; they need to encourage a mix of housing (including relocatables) and active/public transport, as well as making smaller houses possible.

One submitter commented that landholding taxes could assist landholding problems.

One submitter commented that the market should contribute to the rebuild, whilst another submitter commented that subdivisions that lack community (e.g. Wigram and Northwood) should be avoided.

Regional Policy Statement (Appendix 2)

Business

DISTRIBUTION OF BUSINESS ACTIVITIES

There were five main submissions related to this aspect of the Plan. Three submitters commented that a number of terms had not been defined within appendix 2, including the terms; retail development, retail use, industrial activity and ancillary. The submitters concerns were that this could result in unnecessarily restrictive interpretations such as not permitting retail within industrial areas.

All submitters under this aspect were concerned with the need for flexibility around the range of business that can occur within priority business areas. One in particular related to support for large format, trade and yard based retailing activities and another with the need to be flexible in relation to supporting yard based activities outside of industrial business land.

KEY ACTIVITY CENTRES

There were four long submissions related to this aspect of the RPS Appendix from large businesses, Progressive Enterprises, Hardie and Thompson, Kiwi Income Property Trust and AMP Capital Property. All were in support of the concept of KACs. They suggested that an improvement to the model would be a hierarchy of KACs rather than a “one size fits all approach.” The hierarchy suggested was:

the City Centre at the top, then the major KACs (being the major sub-regional centres of Northlands, Westfield Riccarton, Palms Shirley, and the Hub Hornby), with lower order KACs and rural town centres, and then district and local centres, with the policies setting out expectations of role and function.

Particular support was given by three submitters regarding the need for high density housing around KACs. Two of these submitters commented that the threshold tests for identifying a KAC were too high and also that the geographic extent of KACs needs to be identified.

Hardie and Thompson suggested the addition of the Edgware Centre as a KAC and Progressive Enterprises suggested the Halswell KAC be moved to a greenfield area where expansion can occur.

Submitters commented that there is a need to consider: the relationship between the KACs and Central City; issues surrounding the creation of new KACs and the expansion of existing KACs and how the LURP differs from PC1; and that brownfield regeneration is a separate issue that needs a policy approach separate from KACs and medium density housing.

Framework

AIRPORT NOISE CONTOURS

A submission was received from Christchurch International Airport Limited that supported the Plan framework. Specific support was given to policy 6.3.10 as it aids planning for strategic infrastructure related to the airport. A suggestion made by CIAL was for the Plan to provide a consistent definition of ‘noise sensitive areas’. This submission was supported by the attachments illustrating issues with activities in the vicinity of the airport.

Two other submissions were received by submitters with land within the contour boundary. One that opposed the inclusion of the 50Ldn outer control boundary in the LURP because it doesn’t relate to earthquake recovery and the other suggesting that specific considerations should be given to different types of noise sensitive activities.

BROWNFIELDS

Two submissions were received in relation to industrial brownfield development. Both suggested that greater flexibility is needed to allow developments to occur; that it should be left to the market.

PRIORITY GREENFIELD AREAS

There were a number of long submissions made suggesting their land be included as a greenfield priority area, either residential or business. Some of these submissions include attachments that contained information such as; maps locating the specific land, images of the proposed area, geotechnical reports, commissioners' reports related to the land, ODPs and related diagrams. Other one off comments made by submitters include: a request for R14 priority land to be deleted due to specific development constraints; an expression of concern about areas outside the priority sites where development may be hampered and a request for R5 on the Greenfield Priority Area Map to be removed as it is subject to natural hazards – flooding and liquefaction.

Housing

DENSITY

Four submissions related to housing density questioned the need to set a minimum density requirement. They suggested a more realistic and flexible target should be considered or the references to a particular density be removed from the Plan. Each stated that these density provisions can be difficult to meet due to; the way net density is calculated, lack of consideration of the width of roads required, open space requirements and design outcomes sought by urban designers. One of these submitters suggested more careful analysis is needed, particular as this rule could become the principle driver of development proposals.

OUTLINE DEVELOPMENT PLANS

There were mixed responses to this aspect (Policy 6.3.3), two submitters expressed support for the policy, while a few submitters raised concerns and suggested the policy be removed or amended to allow exceptions.

Concerns were raised that ODPs are inappropriate as a mandatory requirement because it is hard to get multiple owners to cooperate on an ODP and that it will slow down development. One submitter suggested that the ODP mechanism is not the only mechanism available and another suggested it is inappropriate to make staging a requirement of an ODP. A supporter of policy 6.3.3 suggested that development master plans are not needed when an ODP is prepared.

RURAL RESIDENTIAL

A number of submitters were in support of policy 6.3.8 as it provides an alternative housing option for earthquake recovery processes, and that providing rural residential sections was essential not just desirable.

A few submitters suggested that if their land could not be added to the priority greenfield areas then rural residential use of the land should be considered. Two other submitters commented that their specific sites should be rezoned rural residential through the LURP process.

One off comments were made by submitters relating to rural residential land, these included: reference to unmet demand for low density sections; the need to remove unjustified barriers to development (such as the requirement that development take place in accordance with a RRPD developed under the LGA); and that there is a need to amend the definition of rural residential.

Infrastructure

TRANSPORT

The Canterbury District Health Board commented on the need to ensure environmentally sustainable infrastructure was provided for and that traffic engineering should minimise conflict between transport nodes.

Both the Christchurch International Airport Limited and Lyttelton Port of Christchurch stated that more recognition needs to be made of their facilities as strategic infrastructure hubs and provision made for their protection, recovery and growth. They suggested a new policy 6.3.10.

EDUCATION

The Ministry of education made a detailed submission discussing the links between the LURP and the Education Renewal Plan. They provided detailed comment on the RPS and made several suggestions for how education should be included in definitions of infrastructure or in how community facilities are interpreted. They stated.

The Ministry of Education seeks the incorporation of "education facilities" into one or other of the definitions of "infrastructure". This will give sufficient scope to consider the interests of the Ministry throughout the RPS. Further, it is suggested that the RPS framework for the definitions of "infrastructure" be rationalised and simplified. However any change must still include "educational facilities".

Natural Environment

Comments under this section have been discussed above or included in the specific text change section.

Urban Design

A number of submitters supported policy 6.3.2 as it would ensure new developments would be appropriately designed. However a few submitters expressed concern that the rule requires a complex set of requirements to be addressed, where the criteria will often not be relevant. These submitters suggested that greater emphasis be placed in the policy on the need to recognise both the surrounding site context and the functional requirements of development in considering design outcomes.

Two other comments were made by individual submitters included: issues should be resolved when land is zoned or subdivided; and that there is a need to have some flexibility in the design of developments to ensure there is variety in residential developments across Christchurch.

Other

One off comments made by submitters included: that predetermined sequencing should not be necessary (policy 6.3.5); a review of workability of proposed RPS amendments should be carried out; that there is a need for decisions on a case by case basis for business proposals in rural areas; and that the timeframes given are not appropriate (priority area owners should be consulted to ensure appendix is realistic.)

Christchurch City Council Plan changes (Appendix 3)

Business

BROWNFIELD INDUSTRIAL

One submission commented on the need for a policy framework for industrial brownfield regeneration and the development of mixed use of these areas. Also that reverse sensitivity should not be a barrier to regeneration of industrial brownfield land.

KEY ACTIVITY CENTRES

The comments on Key Activity Centres have been discussed throughout previous sections of this report.

Framework

AIRPORT NOISE CONTOURS

Three submitters commented that they were opposed to plan change 74 being included in the LURP because the noise contours should be a matter decided by the Environment Court. One submitter's reason for this was that it meant there was no opportunity to seek remedy under s85 of the RMA. Clearwater Land Holdings Ltd opposed plan change 74 as it would prevent further development within the Open Space 3D zone.

Concern about the airport noise contours decisions is expressed below.

CIAL noise contours seem to have been accepted "as is" albeit there has been lots of disagreement as to real adverse effects within noise sensitive areas. Issue highlighted by recent amendments to the 50dBA contour – simply accepted without debate

PRIORITY GREENFIELD AREAS

A number of submitters commented that their land should be included as a priority area.

PRIORITY GREENFIELD HOUSING

The comments on priority greenfield housing have been discussed throughout previous sections of this report.

Housing

DENSITY

One submitter commented that there should be a buffer between high density residential land and any development planned east of the airport noise contour. It was also stated that there should be a transition in section sizes towards the zone boundary line. Another submitter commented that minimum density requirements should be deleted to let the market decide.

ODPs (PC 71 72)

A number of submitters requested that their land be rezoned through the plan change 71 and 72 process to meet housing demand. Three submitters objected to aspects of the ODPs, two due to the location of roads encroaching on their property and one due to the proposed storm-water treatment scheme. One submitter supported the plan change inclusions but specifically stated there is a need to consider additional accommodation for elderly so that land can then be reserved.

STYX (R6)

Two submitters supported the rezoning of this area as they considered it necessary for the purposes of recovery. One submitter questioned the need to establish a Future Urban Development Area rather than rezoning the whole area for urban purposes. Other comments were related to the plan change processes discussed above.

Other

A few submitters commented on residential and business land that they would like to be rezoned within the CCC plan through the LURP process to ensure development can take place. Rangi Ruru Girls School submitted that changes should be made to the CCC plan, via the LURP, to rezone school sites (including the site in cultural 3 and living 3 zone) and amend the definition of educational activity; to recognise that school facilities are used by the wider community due to the loss of facilities after the earthquake. One submitter supported sustainable subdivision at Highsted and the inclusion of CPTED principles.

Waimakiri District Council Plan changes (Appendix 4)

Business

RANGIORA AND KAIAPOI TOWN CENTRES

Two submitters commented on town centres. Both referred to the need to consider the location and provision of infrastructure, such as sewers and roads in developments. One submitter suggested there should be an avoidance of rigid zoning and an allowance for mixed use.

Affinity Trust Group made comments relating to development of a village centre at Ravenswood, seeking a change to the business 2 zone to be made through the LURP process.

Framework

AIRPORT NOISE CONTOURS

Comments under this section were similar to those discussed under the RPS (appendix 2) airport noise contours section above.

PRIORITY GREENFIELD AREAS

A number of submitters commented that their land should be included as a priority area.

Housing

RURAL RESIDENTIAL

Two submitters made comments on the need for plan changes (21 and 32) to be incorporated into appendix 4 to ensure that their land can be developed and provide necessary housing. One submitter requested their land be zoned rural residential as it is in close proximity to the Kaiapoi town centre.

ODPs

Two submitters suggested that an ODP be inserted into appendix 4 that covers their property, to ensure that the land can be developed.

MR873

A submission from the Mana Waitaha Charitable Trust suggested that an ODP and framework of rules for MR873 needs to be included as part of the LURP, that the ODP should guide work in the Kaianga zone and the Tuahiwi Pa zone. In reference to options put forward by the council for consultation, they recommend that a mixture of options 4 and 5 provide a useful starting point.

Other

One submitter noted that there were no proposals for change north of the Ashley River.

Selwyn District Council Plan changes (Appendix 5)

Business

KEY ACTIVITY CENTRES

There was no specific comment on KACs specifically in this area. One submitter commented that West Melton businesses have been left out of the planning framework, particularly those on the west side of Weedons Road. The submitter commented that this is despite existing development of businesses and large scale residential development which needs servicing.

Related to this, South Horticultural Products requested that SDC prepare a plan change to rezone their site to an appropriate business zone to protect its operation and any future expansion.

ROLLESTON TOWN CENTRES

One submitter requested that the land centre of Rolleston bounded by the railway line, Walkers Rd and Two Chain Rd be rezoned business 2.

Framework

PRIORITY GREENFIELD AREAS

A few submitters suggested their land should be included in priority greenfield areas around Rolleston and are included in the specific rezoning processes referred to in the rural residential section below.

Housing

ODPs

There were mixed responses under this aspect of appendix 5. A number of submissions were made in support of the inclusion of ODPs in appendix 5. Specific support was provided by submitters regarding ODP 10 and 11.

A few submitters commented on amendments that should be made to ODPs, such as the need for a roading layout, too much detail, the restrictions on density requirements and the need to further consult with residents before ODPs are adopted.

One submitter opposed the use of ODPs in planning processes as it adds additional costs.

RURAL RESIDENTIAL

A number of submitters commented in relation to their land and the need for it to be included in rezoning processes. Areas of specific mention by a few submitters included; a zone change to Living Z for land along Dunns Crossing Road and East Maddison Road, a zone change from Living 2A to Living Z around Prebbleton, and plan change 21 around Prebbleton. Two submitters made comments on the need for the SDC to prepare a Rural Residential Development Proposal to ensure that development can take place in rural residential zoned areas.

One submitter commented on the need for different considerations related to rural residential areas within the SDC part of the airport noise contour.

Other

Mahaanui Kurataiao provided detailed comment on points they consider need strengthening in the Selwyn District Plan. This submission was accompanied by a nine page table "Table 1 - Points that Te Taumutu Rūnanga consider need strengthening in the Amendments to the Selwyn District Plan". The aspects that were supported in part with suggested amendments were: integrated stormwater management; setting aside land reserves from development;

water quality and quantity; protection, enhancement and restoration of indigenous species, urban design principles; and the recognition of cultural values in new developments.

5. Other comments

Some submission comments fell outside the previous sections of this report or were difficult to allocate to one particular section. A number of them were about the process for developing the LURP and broader issues considered relevant to this Plan. These comments are presented below.

LIKED ASPECTS

The Canterbury District Health Board were in support of a number of aspects of the Plan that were outside the Priorities and Responses.

The Recovery Toolkit diagram pg. 8:

Development of the Plan pg. 13

Support: ECAN's decision to undertake a Sustainability Assessment into the planning process. This analysis can give the writers an insight into the strengths and weaknesses of topics covered in the LURP at an early stage.

The Purpose pg.18

Support: the acknowledgement that the LURP will inform decision-making in relation to infrastructure provision and community services such as public transport and health services.

The draft LURP and related plans pg. 19

Support: the use and acknowledgement of the Greater Christchurch Urban Development Strategy (UDS) in informing the LURP. Decisions made now on land use and infrastructure have long term implications, which may impact on health and wellbeing.

Goals pg. 23

DISLIKED ASPECTS

One submitter didn't like the LURP Process and stated.

LURP is a further assault on good process under the RMA: the disconnect between LURP and the RMA allows development to be fast-tracked without considering the environmental and social implications. LURP doesn't address long-term needs: the Minister's Direction for LURP is to address short-medium term development. This means prioritising the building of housing and businesses over the effects this will have on recovering communities.

The National Council of Women also criticised the development of the LURP.

The Land Use Recovery Plan will be a key guiding document as our city develops, grows, and recovers. The LURP takes the first step toward considering where land might be available- but it stops far from the mark of how the land will be used.

We highlight a concern to illustrate dissatisfaction with the spirit of this document. ECAN employees have on several occasions remarked that the area where they are working (near Addington) is not a desirable place to go for a walk; they have implied that they are looking forward to moving to new developments to the northwest.

We want all of Canterbury to be a great place to live, work, and play-the plan does not seem to take this idea very seriously, and more disconcertingly, the plan seems to think that the

most important inter-workings of good urban form will come together by accident. We need to do better than that.

The LURP warns that things like "long term growth" and community facilities are outside its scope, but because it is an excessively powerful plan-one that can both over-ride and undermine the Greater Christchurch Urban Development Strategy, the City and District Plan provisions democratically developed with the Christchurch City Council, Selwyn and Waimakariri District Councils, other parts of Environment Canterbury, and the Resource Management Act. We cannot accept so many crucial components of recovery and development being pushed aside.

The LURP lacks the vision that is required for a healthy city with good urban form and accessible amenities. We have identified some of the areas that we believe are missing and made suggestions in improving what we see so far.

Other one-off comments were:

Seems to be top down planning process driven by professionals/experts whose customers are commercial developers.

Lack of detail or lack of access to underlying data.

Very little advertising + promotion for workshops...no input from the whole community. Bit of a shame + a waste.

Concern over lack of "certainty" over informing not directing location of health, education and particularly community and recreational facilities.

The exclusion of the red zoned land from the LURP Could be a key asses for future Christchurch.

SUGGESTION FOR DOING THINGS DIFFERENTLY

One submitter raised an anomaly in household projections. Page 36 and page 37 with regard to Selwyn and Rolleston seem to contain inconsistencies in terms of household projects, particularly surrounding whether growth projections for Selwyn District include all of Selwyn or just Rolleston growth.

One submitter stated the need for.

...recognition of the complex nature of food security in an urban environment and the need to provide social and community infrastructure to create sustainable wellbeing for people and the natural environment.

One submitter made this suggestion.

Make regional population change; demand and future growth more explicit: by including the overall population projections for housing and business land demand for greater Christchurch at section 2.3 of the draft LURP. (following the paragraph planning post-earthquake).

And

Expansion of statement of when red zoned land will be recovered and integrated within greater Christchurch by way of strategic planning for reuse process – (ie. 5 years? 10 years? or following the completion of demolition/clearance?).

And

Figure 7 map – potential brownfield development areas

*Include the names of all key activity centres – where indicated by a star * on the map*

The Canterbury District Health Board made these specific suggestions.

Introduction pg 11

Recommendation: *A section is added on the demographic profile of the greater Christchurch area. This would give a context for land use and Christchurch’s population. If a new profile has not been undertaken for the Land Use Recovery Plan, then a link to the demographic trends in the Urban Development Strategy could be used.*

Recommendation: *that the Sustainability Assessment be included as part of the development background. Suggested wording – “The Sustainability Assessment carried out by Environment Canterbury was a useful tool in the development of the draft Land Use Recovery Plan. This assessment provided an initial review of the t social, environmental, economic and cultural criteria, which informed the writing of the preliminary draft version”.*

Recommendation: *that the LURP has the ability to make specific provision for long-term land use patterns or growth beyond its 15 year time frame.*

The challenges for Land use pg. 21

Recommendation: *that a new section is added “Supporting community and social recovery”. This section should acknowledge the consideration that has been given to the effects of each ‘key response’ on the population, in terms of accessibility, connectivity and equity. This section should also stress that good urban design is integral to forming neighbourhoods and communities which are comfortable and enjoyable to live in and ultimately improve wellness. The City Health Profile which captured the views of Christchurch residents pre earthquake identified that greater council support for neighbourhood activities was important.*

Built environment pg. 43

Recommendation: *that the quote marks around health and wellbeing are removed*

Collaboration between partners

The Health Impact Assessment carried out on the Urban Development Strategy identified the importance of having good working relationships between key partners on specific projects.

Recommendation: *that working relationship are emphasised within the LURP especially regarding responsibilities and leadership on each project.*

Leadership

Recommendation: *that additional detail is given regarding identifying which agency is leading each response / individual project and what are the responsibilities of other key agencies. Processes around the implementation and monitoring of each response / project need to also be included*

Community Involvement

The level of consultation for the Land Use Recovery Plan is commendable.

Recommendation: *that consultation is expanded to include the involvement of the community at project level for each of the responses given.*

Statutory Direction

Recommendation: that a flowchart is added to the LURP which clearly demonstrates how Statutory Directions will be put in place and what will be the process for councils to follow.

Substitute the transliterated word Taone with an authentic word from Te Reo Maori that represents the Maori of the vision;

Make sure the plan supports Christchurch people/tagata whenua and their self-sufficiency rather than commercial developers who can invest 'anywhere'.

Knit the 'out of scope' issues into an integrated sustainable plan especially non land use resources.

Anybody that can try to put "Energy Resources" as "out-of-scope" is unfit to be involved in planning. Madness!

Remarkably little chance to question/challenge the underlying assumptions eg growth/resource use/links to other RMPS.

INCLUDE POPULATION SECTION—projected growth & the future of greater Christchurch—retain people & grow city.

Develop a comprehensive storm water renewal programme to rehabilitate our urban surface waters which are presently outmoded.

Development Contributions; repaid to local authority, over 10 years, plus like home heating scheme.

When school crown land is sold can it be offered first to community groups?

Out of scope- the location of health, education, community and recreational facilities. LURP should have more "influence" on community and recreational facilities. Pool complex at New Brighton

Replace QE11 pool and facilities, should be rebuilt on Linfield site where indoor bowl centre is. Pull down trees between Cuthberts green and here make mini Hagley Park. Rejuvenate this area.

Next time name a plan for what it does. This is a housing and commercial development and transport corridor recovery plan, but the name implies more and so prompts confusion and dissatisfaction.

Establishing the creation of new neighborhood centers in Greenfield developments i.e. small dairies/corner shops people can walk to- rather than having to drive everywhere.

Housing, clearer re outcomes especially in existing area – urban villages. ODPs for existing areas – flood management to plan for staged retreat. Sustainable homes, need more than just review of guidelines – toolbox approach. Long term view, impacts will have a long term transitional housing.

Clarity around the process for statutory directions eg, flow diagram within LURP.

Perhaps say more about the hierarchy of centres- local centres recognise the importance of centres. Variation 86 – Judge was supportive of the centres.

Needs to reflect in neighbourhood centres, public street furniture, educational private institutes, public amenity within plan.

Greenfields developments need to include small commercial centres – need to incentive these.

Can you add a requirement into Greenfield area put in commercial area of certain size.

Developers don't seem to be interested – plan doesn't discourage. Elements of a neighbourhood. So long as commercial centre does not conflict key centres, need light rules on size of commercial areas.

OTHER COMMENTS

The all of Government submission stated.

Action focus & Timeliness- *We consider it is important that the LURP be a document of "action". The timeframes set out help to achieve this. Timeliness of the responses will be very important and the benefits will be greater if the LURP (and associated changes to development activity) is in place prior to the peak of rebuild activity. Regulatory changes are particularly important to make early as the lead-in times for development can be protracted and will take time to flow through to increased development activity. This is important given the rebuild is likely to continue to accelerate to a peak in late 2014. International research has shown that recovery needs to be well underway within three years. We would therefore encourage that progress continues to be made on the proposed responses while the LURP is being considered by the CER Minister, where this is possible. For example, partners should progress proposed response 4, the independent review of planning and consenting processes, as soon as possible .*

Governance and Implementation -*We support the emphasis in the LURP on the importance of good working relationships between key partners on specific projects, and collaboration among strategic partners , government agencies , community and private sector. Further clarity on governance and accountability among strategic partners for the overall delivery of the LURP is critical, along with clear leadership and accountability for each of the responses .*

We understand implementation will be supported by the Recovery Strategy governance arrangements that CERA lead and facilitate. It would be helpful for the draft LURP to more explicitly outline these arrangements and how they will support accountability. This includes transparency and clarity on the key mechanism that will support coordination and implementation of the LURP responses across multiple parties.

We would like the LURP to more clearly indicate how the community and private sector can be involved at a project level in implementation of the LURP.

Integration with other recovery plans and strategies - *The draft LURP could be clearer in stating its relationship and integration with other Recovery Plans and programmes. In particular, showing how it builds on and complements the Central City Recovery Plan, Economic Recovery Programme, Greater Christchurch Transport Statement, and identifying relationships with the Social Recovery Programme and Natural Environment Recovery Programme.*

LURP Priorities - *The LURP has identified 10 priorities across three areas that strategic partners consider essential for recovery. We consider the priorities provide good coverage of the range of matters necessary for recovery that are within scope of the LURP. We would suggest the team consider ordering the priorities by those considered most essential to recovery .*

Implementation -We consider further work to refine the amendments to the Regional Policy Statement and District plans, would be beneficial (ahead of submitting to the Minister CER) to ensure that the final amendments adequately reflect the intent and direction in the LURP.

In relation to the funding of initiatives, the implementation section should identify which activities have existing funding. Estimates of initiatives that are currently unfunded should also be provided where significant, with the potential funding source identified if possible.

Monitoring and Review - Section 8 of the draft LURP outlines Monitoring and Reporting for the LURP, which we broadly support. We suggest that monitoring also consider the uptake and development of both greenfield and brownfield areas, including targets for each. Monitoring also needs to consider business land uptake and provision. We note monitoring of the release of greenfield land is addressed in the RPS (Policy 6.3.1). We consider further comment could be made in both the LURP and RPS regarding other areas (eg: business land), the frequency of monitoring and how changes will be made in response to monitoring. If the monitoring identifies that change to the LURP, council plans and processes are required, they should be reviewed when the need arises before the April 2015 review date.

This comment was made by a submitter to do with costs of rebuilding.

Accept that at present: infrastructure is much cheaper when provided by the private sector; building costs for apartments are about twice that for standalone houses or terraces in New Zealand (even Auckland) i.e. a 100m² apartment costs the same as a 200m² house on 1 or 2 levels.

CDHB stated.

Transport

The links between transport policy and implementation and population health outcomes are well established. Active transport and public transport have direct links to public health by:

Enabling individuals to more easily reach their daily physical activity targets.

Reducing the need for individuals to own personal vehicles thus

- *Reducing vehicle emissions that affect respiratory health and contribute to greenhouse gases and climate change,*
- *Reducing congestion, and creating a safer and more efficient road network.*

Enabling those who are for whatever reason unable to own and/or drive a car. These include the elderly, the disabled and children.

The creation of walkable communities with high amenity values and proximity to town centres, schools and parks have direct economic benefits to retail and surrounding businesses.³

Sustainable Otautahi Christchurch Incorporated made this challenge

Integration between recovery plans

The LURP does not exist in isolation - in reality there are a growing number of inter-linked planning documents, strategies and programmes that will determine the pattern and style of future development in post-quake Canterbury. The diagram given on page 19 of the Draft goes some way to identifying this inter-connectedness.

However, specific links with other plans, strategies and programmes should be identified in the LURP.

In particular it is regrettable that the Draft LURP does not integrate with proposals for mixed use and medium density residential developments in the Central City. An acknowledgement of the number of people or households expected to be living in the Central City would have assisted with planning for the number of greenfield residential sections that may be required.

The Urban Development Strategy specifically aimed to prevent sprawl, and its goals should be reflected in the current document.

Similarly, the NERP, in seeking to enhance environmental protection should not be contradicted by the LURP which seeks to develop more built environment. The NERP has no obvious links with the LURP, and since the LURP is to be a Plan with statutory power and the NERP is only a Programme, there is a real risk that environmental criteria will be seen as "nice to have", rather than of central importance to the long term city.

More explicit assessment of access to education facilities is needed in consideration of new development areas. Explicit connections between the LURP and the post-quake situation for education facilities are needed throughout.

Relief sought:

Identify and highlight links between the LURP and other documents, strategies, plans and programmes which will impact on the form and function of the future Greater Christchurch.

LURP Priority 1 statement (re: Regional Policy Statement Chapter 6) requires amendment to explicitly require stronger environment protection and enhancement.

Adopt principles of NERP for inclusion in the LURP and making specific connections between these recovery plans. NERP Projects that need to be addressed within the LURP to demonstrate this include: 1, 3, 5, 8, (9), 11, 12, 13, 17

Incorporate a numerical estimate or goal for residential units in the Central City so that planning for other urban (brownfield) and greenfield sites can be based on a true estimate of need.

Concluding remarks

One of the purposes behind the CERA legislation was that the recovery of Christchurch should proceed with a shared sense of vision. Various visions have been suggested since the earthquakes and one is given on page 23 of the draft document. It is not clear that the provisions of the draft LURP would in fact bring us any closer to the stated vision of "a place to be proud of- for us and our children after us." Sustainable Otautahi Christchurch would like to see a statement of vision that explicitly relates to Strong Sustainability and to the long-term impacts of planning decisions that are being made now.

Planners and decision makers will need to ask themselves real questions such as "Will this plan work?"

"Will this plan take us in the directions that we want?" "Does this plan support our vision?"

"Does this plan sit in accord with what we know or predict for the future?"

"How will this plan be administered and evolve in the time beyond the existence of CERA?"

It should be noted that in the above questions, "we" and "us" relate to the present and future citizens of Greater Christchurch .

It is vital that the Plan and associated plans and programmes are monitored according to the extent to which they satisfy community needs. Simply defining a raft of outcomes to be reported on does not satisfy that requirement.

Sustainable Otautahi-Christchurch (SOC) submits that there is much work still to do before the Land Use Recovery Plan can satisfactorily answer these questions.

One submitter made these comments

What the LURP says, and what it says it will do, appear to be two different things.

The vision as stated and which was envisaged from the 'Share an Idea' process seem to be lost in translation. For example there is: lack of inclusion of accessibility to public green space; lack of consideration given to characterising existing suburbs as urban villages with an opportunity to enhance accessibility to amenities; lack of provision for active (cycling and walking) and public transport, and; lack of understanding about the communities expressed desire as well as urgent need to reduce our car dependency and urban sprawl.

The shortage of time and opportunity for community to engage with this rushed planning process relative to the importance of this LURP in setting the direction for the future of our city is frustrating. I fear that this will mean that many in the community will be surprised later on when changes proceed which the community doesn't necessarily support.

The LURP proposes a large area of greenfield development whilst simultaneously providing a lack of incentivisation of brownfield development and re-development of existing urban areas. More greenfield land is being opened up for development than is required to house all of the projected demand for new housing in post-quake Christchurch.

This means that there is effectively no incentive for achieving an efficient and healthy post-quake urban form for the future of the city. The resulting urban form and function is likely to be significantly less healthy, less sustainable, and more costly for the community, than would be the case if residential development were to be directed more towards the centre.

This LURP needs to recognise that urban form shapes people's life choices and has a strong bearing on health outcomes. As individuals and as a society we will continue to bear the cost if we don't invest in the necessary infrastructure and environmental conditions that determine the health and wellbeing of our community.

"What needs to change as a result of the earthquakes, in terms of residential and business land use priorities , policy and planning provisions, and other tools and incentives, to enable the rebuilding and recovery of greater Christchurch?"

The imperatives of peak oil and climate change should be specifically addressed.

This includes the urgent need to plan for reduced dependency on private cars and the need to relocalise.

Flood-risk zones should be better communicated (than the existing maps provided) with the post-quake drop in land levels affecting many areas in the east. These urban areas will suffer more in future with the anticipated sea-level rises from global warming. Sea level rises are tracking worse than predicted and need to be regularly reviewed. An honest and realistic assessment and communication of the risk should be carried out with consideration given to a carefully managed retreat to protect areas of our city from future natural disasters.

Finally, it is difficult to get a holistic perspective on what future life in the city might look like from this LURP. In the next iteration of this Plan, it would be helpful to communicate how this LURP integrates with City Centre plans, the Natural Environment Recovery Plan, the Canterbury Water Management Strategy, and the Greater Christchurch Educational Renewal Plan.

The National Council of Women stated

We would like to ensure that as land is developed or redeveloped, the availability of alcohol, gambling, and fast food is curtailed.

One submitter commented:

Initially I would like to comment on the relatively short timeframe in which to inform and engage the public about this very important plan under the CERA Recovery Strategy. As the process to develop this plan only began on November 6th, 2012 and the public consultation ends on 22nd April, 2013 I feel that there has been insufficient time to interest people in the LURP...

2. Overall, I am concerned that the LURP is weakened by the fact that it is unable to integrate land use planning for the whole of greater Christchurch, particularly as the residential red zone along the Avon corridor is excluded, as is the central city...

The plan in its present draft undermines the UDS vision for a compact city and overrides other plans previously submitted on by citizens of Christchurch City Council, Selwyn and Waimakariri District Councils and Environment Canterbury. It will not realise the desires of residents' visions for the greater Christchurch as captured in 'Share an Idea'.

One submitter made this comment

Nowhere in the LURP is there reference to community facilities and yet in a post earthquake, post peak oil world where climate change is forecast to increase flooding events, the importance of these facilities has not been acknowledged at all. Please remedy this. Communities are central to recovery and future resilience and they need spaces in which to develop and thrive.

And suggested considering the work of Susan Krumdieck on sustainable cities.

Eastern Vision noted matters that are out of scope.

We note the matters out of scope of the LURP as directed by the Minister. We believe these constraints severely limit the Plan's ability to address "what needs to change in terms of .land use to enable the rebuilding and recovery of greater Christchurch" and to enable the vision of a Greater Christchurch as "a place to be proud of ... for us and our children after us. "All six exclusions, listed on page 6, have specific significance to the recovery of the eastern suburbs in particular and are likely to result in a severe disconnect between the recovery of the east and that of the rest of Greater Christchurch.

The effect of these exclusions is compounded for the eastern suburbs by the lack of appropriate data (modelling is not yet complete) with regard to flood risk. As a result the opportunity to address future land use in the flood management areas is currently excluded from the Plan, despite not being deemed out of scope by the Minister. Indeed we would argue that its exclusion does not meet the Ministerial directive to give consideration of land use changes to avoid or mitigate "the changed or heightened risk of natural hazards." We submit that this needs to be addressed within the Plan as a matter of priority.

The LURP lacks clarity with regard to its inter-relationships and linkages with other planning documents, strategies and programmes. There is no clear overview of these -the diagram on page 19 does not adequately address this (needs to include for example UDS, NERP, CWMS, Mahaanui IMP, CCC Public Space Strategy, etc). There is therefore no overriding sense of, or confidence in, a cohesive integrated urban planning framework for the recovery of Greater Christchurch and particularly the eastern suburbs.

The LURP has the ability to interact and make amendment to all regional-level policy and planning documents.

Consistency between LURP proposals and the objectives of those documents is therefore critical. Failure to achieve this will undermine the ability to realise previously agreed objectives. An important point is that the objectives of the existing policy and planning documents are generally applicable to the post-quake context, having been arrived at through consultation with the community.

The LURP is not an appropriate vehicle for reinterpreting community values. Rather the purpose of the LURP should be to identify how urgent recovery needs can be accomplished in a manner that is consistent with the previously agreed community values and objectives in the post-quake context. Features of the context that are appropriate include an increased focus on natural hazards, resilience and sustainability.

We have severe reservations about the communication and consultation processes provided for in the drafting of such a significant recovery plan. There has been very minimal engagement and participation of the community in the development of the Plan for a number of reasons: the very tight time frames; the complexity of the Plan; the language in which it is couched; the lack of direct, effective and inclusive communication with communities; and the lack of real opportunity to assimilate, review and respond.

Because of this there is a need to build more effective and meaningful ongoing community consultation processes into the implementation of the detail of the LURP at regional, district and neighbourhood level. Timeframes have to better reflect this need.

The Plan is not clear as to which authority has an oversight and governance role, and accountability, for the implementation and integration of the Plan over the next 15 years.

Such clarity is essential for communities, businesses and investors to have confidence in the recovery and its responsiveness to changing needs.

We very much endorse the principles and priorities of the NERP but do not believe the LURP gives sufficiently robust support to these. The relationship between the two needs to be more clearly delineated.

Vision and Goals: Adopt principles of NERP for inclusion in the LURP's goals and make specific connections between these recovery instruments. NERP Projects that need to be addressed within the LURP to demonstrate this include: 1, 3, 5, 8, (9), 11, 12, 13, 17

The Viva Project asked that the following concerns be addressed

The detail of the LURP as it currently stands undermines and discourages the repopulation of the central city by promoting housing alternatives that are ex-urban and car dependent.

The LURP as drafted is taking far too short term a view, seeking to address the immediate issue of housing people displaced by the earthquake, but setting up an urban form that will not be sustainable and will leave the people in the exburbs in a severely disadvantaged

position as the impacts of peak oil make commuting such distances uneconomic. The negative legacy of urban sprawl is now extremely well known- including collapsing prices of exurb, rural fringe settlements, increased infrastructure costs associated with a larger urban footprint, increased transport costs for commuters, reduced access to community facilities, and reduced access to active transport modes. Best practice land use planning internationally is now seeking to address these negative impacts by instead focusing on well-designed intensification in urban villages within city boundaries.

CERA and TAS to coordinate simple communication that ensures accessibility and understanding by all communities and social groups of the LURP.

CERA & TAS to review unrealistic timeframes to ensure an optimal balance of genuine effective timetabling.

The Viva Project asked that the following concerns be addressed

This submission is to address the question on page 11 of the draft LURP – “What needs to change ... to enable the rebuilding and recovery of greater Christchurch?”

Reservations about how the many recovery plans will be reintegrated to inform a cohesive Urban Plan for Greater Christchurch – and the transparency around this process of integration

Communication process used to ensure the diverse voice of all residents in the Greater Christchurch area.

The engagement and participation of the community by their specific stakeholder partner to the LURP such as CCC, has been severely compromised by the short time frame for the consultation process and the lack of direct contact with resident associations and other key community organisations.

The Cancer Society had some overall comments to make

Alcohol a ‘growing’ concern.

... we would encourage you to be mindful of the harm that alcohol can cause to public health and social cohesion.

...People were generally concerned at the level of alcohol related harm in communities.

Cancer Society with reference to the Land Use Recovery Plan Draft would like to highlight:

- *Development of new sport, recreation, leisure and community facilities: These environments should continue and be promoted as being Smokefree under the current policy. These are important focus areas where children and adults interact and where role modeling good behaviour eg, being Smokefree is strongest.*
- *Smokefree policies for green space may reduce the number of cigarette butts and level of waste from these areas. Also increases the aesthetic qualities with a reduction in visual impact of cigarette butts.*
- *Smokefree parks, playgrounds and sports grounds is an important contributor to providing a good personal health and well being by those who play or are around those who play sports and participate in leisure.*
- *That all new neighbourhood sports, garden and green space including parks are designated smokefree supported by on-site signage on park signs, information signs.*

- *Recognize the Government’s vision of Smokefree 2025 in the Plan , and the important role that all partners can play in contributing the vision through Smokefree policy*

Planning for a Sunsmart Environment:

The way our region’s infrastructure and built environment is designed has a huge role in determining how much ultra violet radiation (UVR) exposure the public receives.

Through the ‘re-build’ Christchurch has a unique opportunity to significantly improve sun protection by increasing the availability of shade – an area which the Cancer Society believes has been insufficient in the past – particularly in areas where children congregate, such as playgrounds. The Cancer Society’s vision for Christchurch is that the long-term health of residents will be improved by the public having sufficient opportunities to safely enjoy the sun or seek out shade (from September through to April), throughout all areas of the city...

Lincoln University stated.

We strongly support the general premise of the LURP and the comprehensive approach taken for the betterment for Greater Christchurch. In particular we support the ‘direct implementation of regulatory responses’, as it provides greater certainty in terms of resource management process, timeframes and outcomes.

One submission stated.

We note the Plan does not address long-term needs but rather short- to medium-term development focused on building housing and businesses. Given that we are all faced with a number of long-term challenges, such as the end of cheap oil and climate disruption, we view the failure to plan for these as a major oversight in the plan.

CCS Disability Action suggested:

The Land Use Recovery Plan needs to:

- *Include accessibility experts from the beginning.*
- *Make sure infrastructure is accessible to all.*
- *Ensure that all commercial and public buildings are fully accessible.*
- *Ensure that public transport options are fully accessible.*
- *Get the Council to increase their accessible housing stock and to support the Universal design concept in private homes.*

The Land Use Recovery Plan is an opportunity to integrate accessibility planning throughout planning and services. This will benefit everyone within the greater Christchurch region and put Canterbury on track to be one of the most liveable and accessible places.

Best practice is to include accessibility experts in the planning process from the very beginning. This has three enormous advantages.

- *Reduced costs*
- *More chance of change and compromise*
- *Better quality outcomes.*

Changes in the design stage are vastly cheaper than later on. Often designers and architects are unaware of accessibility issues or believe, wrongly, that accessible options would be too costly.

Mahaanui Kurataiao made some high level statements of what they think should be considered in the LURP.

Ngāi Tahu have been providing information, advice and recommendations to development planning in these districts for many years. Mahaanui Kurataiao Ltd has been involved in this work on behalf of these Rūnanga for the last five and a half years. In this work, the primary objectives of Ngā Rūnanga are that:

- *the principles of the Treaty of Waitangi are taken into account in government decision making about land development;*
- *that particular regard is given to Kaitiakitanga in decisions related to land development;*
- *that the relationship of tangata whenua and their culture and traditions with their ancestral lands, waters, sites, wāhi tapu and other taonga are recognised and provided for; and*
- *that historic heritage is protected from inappropriate subdivision, use and development.*

This sees these Rūnanga taking a position of opposing any development that has not adequately recognised and provided for these matters in the applications and assessments. And Ngāi Tahu have developed a number of standard processes that provide for this to be brought into the planning and consent processes that development entails.

As the Draft LURP sets out both a framework to enable development in Christchurch, Selwyn and Waimakariri through a decision-making framework that sits outside the Resource Management Act, it is considered essential that these basic provisions are provided for in the Draft LURP. Such provisions currently appear to be missing from the Draft LURP, and as such there is concern within the Rūnanga that their values and relationships will not be adequately provided for by the plan changes which are included in the Draft LURP.

It is important to note that Ngā Rūnanga are not opposed in principle to these areas being included in the Draft LURP, but are seeking to ensure that the appropriate provisions are made in the matters that must be provided for, assessed and addressed as a part of the development proposals.

It is therefore requested that the terms tangata whenua values and relationships, or cultural values and relationships are inserted in the appropriate areas of the Draft LURP, to ensure that at a high level in the Draft LURP the signal is given that these matters will be recognised and provided for in the development of these areas, including provision for Outline Development Plans to include a tangata whenua layer (which is now the best practice standard for development that is sought by Ngā Rūnanga in these areas). The value of this is that it enables matters of interest to be identified and provided for at an early stage of the planning processes.

In addition, Ngā Rūnanga seek that the Draft LURP makes specific reference to the Mahaanui Iwi Management Plan 2013. This recently released iwi planning document, aimed at informing developers of the matters that Ngā Rūnanga consider are relevant to the consideration of impacts of development activities on their values and interests, and includes all the matters of direct relevance, and the addition of guidelines for subdivision and development.

Identification of Ngāi Tahu sites

A footnote should be added to the map of the Ngāi Tahu sites in the Draft LURP, noting that there are other sites of significance that are not recorded in publicly available form, and consultation with Te Rūnanga o Ngāi Tahu and Papatipu Rūnanga is required to determine whether any such sites exist within a proposed development area.

One submission commented on planning jargon.

I believe that this plan was not written in a way in which it could be fully understood by the general public, without years of education and experience in planning. Many of the phrases sound like absolute mumbo-jumbo, and furthermore, the presentation at the public meeting I attended was not much better. I expect better.

Eliott Sinclair made these overall comments

Eliot Sinclair staff have attended stakeholder and community workshops and overall, consider the LURP Includes good Ideas, but note that it is pitched a high level that lacks the necessary detail as to how proposed responses will be achieved and implemented. Eliot Sinclair consider this makes it difficult to provide comprehensive comments,

Eliot Sinclair consider there is a large degree of overlap within the preliminary Draft LURP and consider that 46 responses is excessive, especially given the lack of clarity and detail about the key action points to be delivered in priority to others. Some responses are specific, whilst others lack sufficient detail for full comments. The intent and timeframes of those without detail pose a risk of far reaching consequences for the community if implemented without clarification in the Draft LURP to the CER Minister.

For this reason, Eliot Sinclair consider many of the timeframes may not be realistic to be fully effective. Indeed many of the timeframes specified beg the question as to whether there is background detail and reporting that Council's have not included for comment at this stage, with an intention to include it in the Draft LURP to the Minister in June.

Te Hapu o Ngati Wheke Incorporated made comment about The Consultation and Engagement Process with Te Hapu o Ngati Wheke

Te Hapu o Ngati Wheke acknowledges ECAN for its robust and comprehensive engagement process with Te Runanga o Ngai Tahu (TRONT) to date. The information that has filtered through to the hapu has been useful in developing our understanding of the process.

The LURP is significant to Te Hapu o Ngati Wheke as it provides an opportunity to influence changes to the regulatory framework with governs statutory planning decisions for MR875. Te Hapu o Ngati Wheke recognise that this initiative may effect changes in the way future growth and the management of natural and physical resources in Rapaki Bay is determined. It is therefore of the utmost importance that Te Hapu o Ngati Wheke continue to be actively consulted and engaged in the development of the LURP.

Clearwater Land Holdings requested this change

That the LURP (and associated appendices) be substantially amended so that either its provisions are directly confined to measures necessary for recovery and that all objectives, policies and other provisions relating to long term growth of Greater Christchurch are removed; or

Without prejudice to the above general relief, that the LURP (and associated appendices) be amended in order to provide for the completion of development at Clearwater Resort such that it can efficiently utilise the existing infrastructure at the Resort.

Other individual submissions comments were.

Madness to separate out the city centre from the suburbs—each influences the other. The out-of-scope is illogical.

Restore and enhance the Avon River and Estuary and wetlands. Dredge, replant, re-establish old walkways.

Involve public in community gardens/parks to maintain 'ownership'.

Develop the most cost effective land first, i.e. fastest return.

At best this "consultation" can impact on the fine-print. We have no meaningful chance to comment in the underlying philosophy.

Population Retention & Growth Section. Aspirational goal for greater Christchurch.

PRIORITY COMMENTS: democratic process: transparency, accountability. To see that community outcomes are being implemented. Local decisions being made locally, not top down overriding of local feedback

How to bring this to the community for them to contribute

These points were made at the follow up Impact Assessment Workshop held on 16 April

- *Business - hierarchy of centres, recognise links between centres, neighbourhoods. Link centres/neighbourhoods etc with good transport, especially public and active. Greenfields, better direction for small commercial centres/neighbourhood shops, need incentives. Process, problems getting cultural perspectives. Need to be proactive. Future proofed LURP = important. How will look in 10-20 years.*
- *Framework - implement tool/agency important to make sure organisations are clearly identified and clearly understood. Culture - Maori concepts do not come through. Not even explained in glossary – meaning didn't get into LURP. Tension between philosophies and rules. Urban design difficult to pin down into rules, maybe contradictions between other rules eg, stormwater. Progress report important and leadership.*
- *Have you tried to be disruptive in deciding settlements? Rock and a hard place. Brownfields play a big part in that. Climate change – managed retreat is an approach. New Zealand is to move from these areas (flood prone).*
- *Business land by airport: isn't there concern around groundwater protection in the North West review?*
- *Russley development business parks. No connectivity, no social hubs, no clear direction, what type of mixed use? Will we repeat mistakes of the past?*
- *Managing the transition of office places in the business parks, may not be sustainable having things spread out.*
- *If a business is generating a lot of travel, need to be in the centre – forecasting practise relating to technology, fuel prices.*
- *Focus on intensifying along PT corridors. Further density.*

- *Pedestrian infrastructure around business such as supermarkets. Function – integration at a functional level, accessibility and connectivity.*
- *Pg 45, main activity centre will be on edge of the city, decentralisation of the east – temporary. Central city will also be sub regional central. Can you take the responses and rescore the LURP against the criteria.*
- *Business can be quite constricted, ability to influence decisions. Building costs are expensive – can council influence through plans? Will it result in MA process?*
- *Are the new Greenfield providing for new neighbourhood commercial private sector recreational areas. Are Brownfield developers also re-establishing the old commercial areas?*
- *Bromely: a lot of land damage, want to re-establish these places. MBIE have been investigating.*
- *Looking from working force up (not business focus) look at innovative ways to enable people to use the land, need partnership, business, building may not be fit for purpose so could work with others to rebuild a different way, change footprint, eg, daisy chains – landlords work collaboratively.*
- *Is employment rising? Diversity is not covered, it would take into account the local labour market.*
- *Relates to housing issues – people chose areas that are accessible for them.*
- *Add in social aspects of employment, attempt to preserve local labour markets, low income areas don't promote public transport.*
- *Cultural aspects from assessment not captured. How does this plan capture a voice of the vulnerable? What can we capture, how do we engage better? What needs to change within the urban fabric?*
- *Has there been a focus on ethnically focused suburbs/precincts? A lot depends on certain facilities. Integrated centres – social, cultural areas. What are the specific needs of cultural groups/granting a voice. Not actively engaged them? Very important, especially Asian communities.*
- *Need to engage different cultures.*
- *Linking neighbourhoods with transit routes and active/public transport.*
- *Capturing the hierarchy of neighbourhoods and building on the communities (labour markets).*

Specific text change suggestions

64 MEMORIAL AVENUE INVESTMENTS LIMITED

Amend Appendix 2 as follows: Objective 6.2.6 – Business land development

Greater Christchurch's land requirements for the recovery and growth of business activities is identified and provided for in a manner that supports the settlement pattern brought about by Objective 6.2.1 recognising that: The priority areas, with the exception of Priority Area B6, provide for the accommodation of new, largely industrial business activities; Industrial land is to be used primarily for that purpose, rather than as a location for office and retail development; Non industrial business land development is primarily to be directed to the Key Activity Centres; and Business development adopts appropriate urban design qualities in order to retain business, attract investment, and provide for healthy working environments

Policy 6.3.6 – Business land To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments; business activities are to be provided for in a manner which: Recognises that the additional Greenfields business land, with the exception of Priority Area B6, is primarily for industrial activities; Avoids development of industrial land for office or retail use, unless that use is ancillary to industrial use of the surrounding area; Recognises that Priority Area B6 is suitable for a range of business activities serving a local or district centre function in recognition of its location in proximity to the airport and its function as the gateway to the City. (56) Reinforces the role and attractiveness of the central city as the City's primary commercial centre and any other key activity centres;

Specific relief sought: 12. Include a new Response within Priority P8 as follows: R36 Christchurch City Council undertake an integrated approach to review of zone provisions for the Special Purpose (Airport) Zone and the development of business zone provisions for Priority Areas B4, B5, B6 and B7.

BUNNINGS, PLANZ CONSULTANTS LTD

Either, insert a definition into the RPS of 'industrial' that clarifies that this term includes large format, trade and yard based retailing; or

Amend Objective 6.2.6 as follows:

*industrial land is to be used primarily for that purpose, rather than as a location for office and retail development, **whilst recognising that large format, trade, or yard based retailing is appropriate in industrial areas**"; and*

***"new office and small format comparison retailing"** ~~non industrial business land development~~ is primarily to be directed to Key Activity Centres"*

Amend Policy 6.3.6 'Business land'

*(4) Avoid development of industrial land for office or retail use, unless that use is ancillary to industrial use ~~for the surrounding area~~ **or that is dependent on large format floorplates or yard-based display areas**".*

CASTLE ROCK ESTATE, AGENT FIONA ASHTON

R1 Statutory Direction: Insert a new chapter into the Canterbury Regional Policy Statement (as set out in Appendix 2).

Attitude to Response Do Differently

Changes Requested

Amend Policy 6.3.1 (3) and Method Territorial Authorities (3) as follows:

(3) Ensure urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the

CRPS or are in locations close to, and which can be integrated with an existing community which includes, Red Zoned land i.e. land identified by the Canterbury

Earthquake Authority as unlikely to be suitable for continued residential occupation for a prolonged period of time; and subject to proposals for urban activity in such areas meeting all other provisions of the RPS.

District plans should avoid urban activities outside of existing urban or priority areas except where urban activities will provide replacement housing and/ or business areas close to (generally within 1km) and integrated with existing communities with Red Zoned land.

Amend the last part of the definition of Net Density as follows:

The area (ha) excludes land that is..

Required for setbacks from infrastructure such as transmission lines

Any other consequential changes to give effect to the requested changes.

CAVENDISH PLANNING GROUP, AGENT DAVIE LOVELL-SMITH

Requested Amendments

to rezone the land identified above (block bounded by Cavendish Road, Grampian St, Claridges Rd, Highsted Rd and Styx Mill Rd) from Rural 3 to Living G (Highsted) in the Christchurch City Plan. (Details of the zone change were included).

CHRISTCHURCH INTERNATIONAL AIRPORT, CHAPMAN TRIPP

LURP Appendix 2 – RPS Chapter 6 text amendments

Objectives

Objective. 6.2.1 Urban form and settlement pattern

The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:

Add a new matter as follows:

.....

(h) Providing for the intensification of a range of business and employment activities at the Christchurch International Airport infrastructure hub

Objective 6.2.3 Enabling urban recovery, rebuilding and development

Recovery, rebuilding and development is enabled within Greater Christchurch through a land use and infrastructure framework that:

.....

(10) achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure; maximises the efficient use of existing infrastructure capacity at the Christchurch International Airport by providing for a range of business and employment opportunities; and

Policy 6.3.1 – Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

Subject to Policy 5.3.4, recognise that Map A identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery, taking into account the following:

....

The need to avoid the establishment of noise sensitive activities within the 50 dBA Ldn noise contour and the 50 dBA_{7 day} engine testing contour for Christchurch International Airport

Policy 6.3.3 – Development in accordance with outline development plans

Development in greenfields areas, including rural residential development, is to occur in accordance with the densities and locations as set out in an outline development plan or rules for the area. Subdivision cannot proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will:

....

Show proposed land uses including:.....

(f) Land required for stormwater treatment, retention and drainage paths, including how such systems and landscaping will be designed and managed to minimise the risk of bird strike if located within 13 km of the Christchurch International Airport.

Policy 6.3.5 – Integration of landuse and infrastructure

Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:.....

Only providing for new development that does not affect the continued operation of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50 dBA Ldn noise contour and the 50 dBA_{7 day} engine testing contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, or priority area identified for Kaiapoi. Regard should also be had to bird strike risk to airport operations when considering plan changes or resource consents for specified activities; and....

Methods

Territorial Authorities: Will

Include objectives, policies, and rules in district plans that avoid noise sensitive activities within the 50 dBA Ldn noise contour and the 50 dBA_{7 day} engine testing contour for Christchurch International Airport, unless the activity is within an existing urban area, or priority area identified for Kaiapoi. The District Plans shall also include provisions that have regard to the need to minimise bird strike risk to airport operations when considering plan changes or resource consents for Bird Strike Risk activities.

Add a new definition for 'Bird Strike Risk Activities' (see below).

Add a new policy as follows:

Policy 6.3.10 Development of Strategic Infrastructure Hubs

To provide for the recovery, protection and growth of the strategic infrastructure hubs of Christchurch International Airport and the Lyttelton Port of Christchurch, including the enabling, development, and intensification of a range of business and employment activities adjacent to transport facilities and in locations where there is existing infrastructure capacity, as a key means of supporting the recovery of Christchurch.

The Regional Council:

Will

Have regard to Policy 6.3.10 in relation to any plan changes or resource consents relating to the recovery, development and expansion of Christchurch International Airport and the Lyttelton Port of Christchurch.

The Christchurch City Council:

Will

Include objectives, policies, and rules within the City Plan that implement Policy 6.3.10 and provide for the ongoing development of a range of business and employment opportunities within these infrastructure hubs.

Principal reasons and explanation

The Christchurch International Airport and the Lyttelton Port of Christchurch are strategic infrastructure hubs that will play a crucial role in the recovery of greater Christchurch as the City's two primary points of entry. Both hubs are well serviced by existing network infrastructure that has capacity to accommodate further business and employment growth. Such growth needs to be facilitated to ensure that these ports fulfil their functions as the gateways to Greater Christchurch, remain internationally competitive and attractive, and are able to provide for the City's recovery through the efficient and cost-effective distribution of goods, services, and passengers to the City.

Add a new definition for 'Bird Strike Risk Activities'

Means

The creation, design and management of water features, and the establishment of refuse dumps, landfills, sewage treatment and disposal, pig farming, fish processing, cattle feed lots, wildlife refuges, abattoirs and freezing works, and any other activities that have the potential to attract numbers of dangerous bird species within 13 km of Christchurch International Airport

Amend definition of 'noise sensitive activities'

means

Residential activities other than those in conjunction with rural activities that comply with the rules in the relevant district plan as at 23 August 2008;

Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose

~~(Airport) Zone in the Christchurch District Plan or on other land used or available for business activities;~~

Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex.

LURP Appendix 3 – Christchurch City Plan text amendments

The proposed changes to the Christchurch City Plan set out in this Appendix cover the following:

Amendments to identify the location and extent of priority Greenfield areas needed for recovery through to 2028 (insert the areas shown in Map A);

Amendments to identify where rebuilding and development should not occur before 2028;

Identifying and locating priority areas for Greenfield development in the Upper Styx area (R6);

Introducing an Outline Development Plan requirement and a Master plan into the City Plan for the Upper Styx area (R6) to guide future urban development for the area;

Amendments to manage activities within with 50dBA airport noise contour and the 50 dBA_{7 day} airport engine testing noise contour, including amendments to rules in the Rural and Business chapters; ~~and~~

Amendments to planning maps showing the location of the 50dBA and the 50 dBA_{7 day} airport engine testing noise contour.

(A) Airport Noise Contours Volume 3, Planning Maps

Amend the following planning maps by adding the '50 dBA_{7 day} engine testing noise contour' (see Attached contour map):

16B-17B, 22B-24B, 30B

Delete the 'Aircraft Engine Testing Area' and associated '800m noise setback' circle from Planning Map 23B.

Volume 2, Policy 6.3A.7 Airport operations

To ~~discourage avoid~~ noise-sensitive activities within the 50 dBA Ldn the noise contour and the 50 dBA_{7 day} engine testing noise contour around Christchurch International Airport and to ensure that the threat of bird strike to airport operations is minimised when considering plan changes or resource consents for Bird Strike Risk activities. ~~except:~~

~~Those permitted in conjunction with rural activities in the rural zones, and~~

Activities within the existing Living zones as defined in the city plan; and

Activities in the Open Space 3D (Clearwater) zone

For the purpose of this Policy "noise sensitive activities" means:

Residential activities other than those in conjunction with rural activities that comply with the rules in the plan;

Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan ~~or on other land used or available for business activities~~;

Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex.

except permitted activities within the existing Living Zones and Open Space 3D (Clearwater) zone as identified in the relevant District Plans

Amend the 7th paragraph to the Explanation and Reasons as follows:

This policy is intended to ensure that Christchurch International Airport, including engine testing facilities, can continue without undue restriction and that residential amenities and the quality of life for people living around the airport are safeguarded. In the Christchurch context it is not necessary to permit urban residential development to occur on land within the 50 dBA Ldn contour as sufficient land for residential expansion can be provided at other locations. It is likewise not necessary for noise sensitive activities to be located within the 50 dBA_{7 day} engine testing noise contour, especially when balanced against the need to ensure the ongoing ability for engine testing to continue to operate and to support both airport operations and the substantial contribution that the testing facilities makes to local employment and the local economy.

Add a new paragraph to the end of the Explanation and Reasons as follows:

The safe and efficient operation of the airport is also dependant on the minimisation of the risk posed by bird strike. It is therefore important that decision makers have full regard to the need to minimise such risk when they are considering plan change or resource consent applications for activities that have the potential to attract birds. Such activities should be carefully designed and managed to reduce their attractiveness to dangerous bird species to ensure that passenger and aircraft safety is not put at risk.

Volume 2, Policy 7.8.1-7.8.3 Airport services

Amend the final paragraph of the Explanation and Reasons as follows:

In this explanation, "noise sensitive activities" means:

Residential activities other than those in conjunction with rural activities that comply with the rules in the plan;

Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan ~~or on other land used or available for business activities~~;

Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex.

except permitted activities within the existing Living Zones and Open Space 3D (Clearwater) zone as identified in the relevant District Plans

Volume 3, Definitions

Add a new definition for 'Bird Strike Risk Activities'

Means

The creation, design and management of water features, and the establishment of refuse dumps, landfills, sewage treatment and disposal, pig farming, fish processing, cattle feed lots, wildlife refuges, abattoirs and freezing works, and any other activities that have the potential to attract numbers of dangerous bird species within 13 km of Christchurch International Airport

Volume 3, Part 3 Business

Critical Standard 5.4.7 Noise sensitive activities

~~In the Business 8 Zone no~~ No noise sensitive activities (as defined in Policy 6.3A.7) are permitted within the ~~Ldn~~ 50 Ldn dBA air noise contour or the 50 dBA_{7 day} engine testing noise contour as shown in Variation 4 to Change 1 of the Regional Policy Statement.

Reasons for rules

7.3.9 Residential units and noise sensitive activities

Amend the second paragraph as follows:

~~No residential units or other noise sensitive activities are provided for underneath the ~~Ldn~~ 50 Ldn dBA air noise contour or within the 50 dBA_{7 day} engine testing noise contour (as shown in Variation 4 to Change 1 to Chapter 12A to the Regional Policy Statement) in the Business 8 Zone~~ in recognition of the potential for such activities to give rise to reverse sensitivity effects on the ongoing operations of Christchurch International Airport and, in the case of the Business 8 Zone, the lawfully established operations within the nearby Rural Quarry Zone.

Volume 3, Part 4 Rural

Critical Standard 2.5.7 Aircraft noise exposure

Amend subclause (a)(iii) as follows:

~~(a)(iii) Subject to subclause (b) below, any proposed residential unit, or any building or part of a building described in Part 4, Appendix 1, which is within the 50 dBA_{7 day} engine testing noise contour~~

~~800m of the engine testing area (located in the Special~~

~~Purpose (Airport) Zone and shown on Planning Map 23) shall be a non-complying activity.~~

Volume 3, Part 8 Special Purpose Zones

Critical Standard 3.3.1 Aircraft noise exposure

~~No dwelling or any building or part of a building described in the Aircraft Noise Exposure Rules (refer to Part 4, Appendix 1) shall be erected within 800 metres of the engine testing area located in the Special Purpose (Airport) Zone as shown on Planning Map 23.~~

Reasons for Rules

~~13.2.9 Aircraft noise testing area~~

~~A rule applies to the rural zones controlling dwellings within 800m of the aircraft noise testing area, identified at the western end of the airport cross runway within the Special Purpose (Airport) Zone (Map 23B). This location, while not ideal, offers the least potential disturbance to persons living near the airport, although some disturbance may still occur from time to time. In order to ensure that adverse noise from engine testing is at least minimised, the majority of engine testing activities will take place within 200m of the “cross” identifying the Aircraft Engine Testing Area shown on Planning Map 23B.~~

LURP Appendix 4 – Waimakariri District Plan text amendments

Insert new definition of ‘noise sensitive activities’ in Chapter 1 (and delete existing definition)

Residential activities other than those in conjunction with rural activities that comply with the rules in the plan;

Education activities including pre-school places or premises;

Travellers’ accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex

LURP Appendix 5 – Selwyn District Plan text amendments

Insert new definition of ‘noise sensitive activities’ in Township Volume, Part D (and delete existing definition)

Residential activities other than those in conjunction with rural activities that comply with the rules in the plan;

Education activities including pre-school places or premises;

Travellers’ accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex

Insert new definition of ‘noise sensitive activities’ in Rural Volume, Part D (and delete existing definition)

Residential activities other than those in conjunction with rural activities that comply with the rules in the plan;

Education activities including pre-school places or premises;

Travellers’ accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;

Hospitals, healthcare facilities and any elderly persons housing or complex

APPENDIX C: SUPPORTING MATERIAL

DONCASTER, AGENT MCCrackEN + ASSOCIATES

Request for amendments to the Waimakariri District Plan.

(a) Chapter 17 Residential Zone.

Add new Policy 17.1.1.(...), Explanation and Methods 17.1.1 (... }to read as follows.

Policy 17.1.1.1 (...)

Ensure that subdivision and development within the Lehmans Road (North) section of the North West Rangiora Outline Development Plan area achieves a minimum net density 10 households per hectare. averaged over the whole site and a minimum of 120 households for the area.

Explanation

Policy 17.1.1. (...) require developments within the Lehmans Road (North) area of the North West Rangiora Outline Development Plan to be in accordance with the density provisions of the Regional Policy Statement. This ensures the most suitable use of the land to create a comprehensive and integrated residential area for affordable houses efficiently accessing existing infrastructure.

Methods

District Plan Rules 17.1.1. (...)

Subdivision and land use standards.

EASTERN VISION

Priority P1: Insert a new bullet point 3: "The strengthening and establishment of interconnected neighbourhood villages with a high level of readily accessible local amenity that contributes to a unique sense of place and belonging."

Priority P3: 11 Append "including at neighbourhood level." Priority P3: R12 Append "Complete transport analyses for the eastern redevelopment areas to clearly define infrastructure and service needs to guide decisions on reconfiguration and redevelopment. " Priority PS: R21 Insert "This may focus on, but not be limited to, the 6,000 properties..." Priority P6: R22 Append "and using land that may only support transitional accommodation in the medium term (eg due to long-term flood risk)". Priority P6: R27 Insert "... that enable comprehensive residential or mixed use developments in existing urban areas to support the creation or consolidation of urban villages, including ... ". Priority P7: R31 Append "Such design to include provisions to support the strengthening of resilient neighbourhood villages".

FLETCHER DISTRIBUTION GROUP. AGENT PLAN CONSULTANTS

Relief sought: Either, insert a definition into the RPS of 'industrial' that clarifies that this term includes large format, trade and yard based retailing; or Amend Objective 6.2.6 as follows: industrial land is to be used primarily for that purpose, rather than as a location for office and retail development, other than for building supplies, trade, or yard based retailing which is appropriate in industrial areas"; and "new office and small format comparison retailing non-industrial business land development is primarily to be directed to Key Activity Centres. Amend Policy 6.3.6 'Business land'

(4) Avoid development of industrial land for office or retail use, unless that use is ancillary to industrial use for the surrounding area or is for building supplies, trade, or yard-based activities".

GRANT ROAD HOLDINGS, RICHARD PEEBLES BUTTON AND MITCHELL FAMILIES, AGENT PLANZ CONSULTANTS

Relief Sought

The parties seek that:

The land shown in Appendix A attached (properties with frontage to Grassmere St and within the wider Cranford Basin) to these comments be included as a Greenfield Priority Area within Map A Appendix 6 of the Appendix 2 of the Land Use Recovery Plan (LURP);

That Policy 6.3.7(3)(b) be amended to read:

15 household units per hectare in Greenfield Areas in Christchurch City except for the Grassmere Street priority area where a lesser level may be achieved.

Add to the Principal reasons and explanation to Policy 6.3.7 a new paragraph:

An exception has been made to the minimum density requirements for an area of land adjoining Grassmere Street where a lower level of density may be achieved. This area is very close to an existing Key Activity Centre and services and its development for residential purposes represents a sustainable and efficient use of the land resource. It is recognised however that there are existing well established dwellings within the area and that the cost of development at a level of 15 households per hectares may be prohibitive due to potential ground remediation for portions of the area and therefore flexibility has been allowed in the density level.

Add a further column to the ‘Key to Appendix 6 – Map A’ under Northern Christchurch as follows:

Location of Priority	Area Ref	Sections by 20	Sections by 20	Sections by 2028	Section Total	Zoning Status
Greenfield Residential Areas		16	21			
Northern Christchurch						
Belfast 293		1300			1300	Done
Highsted - Upper Styx	R6		1662		1662	Required (process started)
Belfast Park - East Belfast		200	440		640	Done
East Belfast remainder	R4		510		510	1. Required
Highfield	R5	500	1600		2100	Required (process started)
Prestons		1700		600	2300	Done
Russley	R7	98			98	Required
<u>Grassmere Street</u>	<u>R18</u>	<u>23 - 150</u>		<u>27 - 110</u>	<u>50 - 260</u>	<u>Required</u>

KEITH MACINTOSH, AGENT: FIONA ASHTON

*Do Differently, Changes Requested: Appendix 2: Canterbury Regional Policy Statement.
Amend first part of Policy 6.3.8 as follows;
Rural residential development further to areas already zoned in district plans as at 151
January 2013 may be provided for by territorial authorities in accordance with adopted rural
residential plans prepared in accordance with the Local Government Act 2002, subject to the
following: except that this restriction shall not apply to Selwyn District Council area until such
time as a rural residential plan prepared in accordance with the Local Government Act 2002 is
adopted by the Selwyn District Council.*

LYTTELTON PORT OF CHRISTCHURCH

LPC seeks the following new policy in the LURP, Appendix 2 (changes directed to the RPS):

Policy 6.3.10 Development of Strategic Infrastructure Hubs

*To provide for the recovery, protection and growth of the strategic infrastructure hubs of
Christchurch International Airport and the Lyttelton Port of Christchurch, including enabling
the intensification of a range of business and employment activities adjacent to transport
networks and in locations where there is existing infrastructure capacity, as a key means of
supporting the recovery of Christchurch.*

Methods

The Regional Council:

Will

*Have regard to Policy 6.3.10 in relation to any plan changes or resource consents relating to
the recovery, development and expansion of Christchurch International Airport and the
Lyttelton Port of Christchurch.*

The Christchurch City Council:

Will

*Include objectives, policies, and rules within the City Plan that implement Policy 6.3.10 and
provide for the ongoing development of a range of business and employment opportunities
within these infrastructure hubs.*

Principal reasons and explanation

*The Christchurch International Airport and the Lyttelton Port of Christchurch are strategic
infrastructure hubs that will play a crucial role in*

*the recovery of greater Christchurch as the City's two primary points of entry. Both hubs are
well serviced by existing network infrastructure that has capacity to accommodate further
business and employment growth. Such growth needs to be facilitated to ensure that these
ports fulfil their functions as the gateways to Greater Christchurch, remain internationally
competitive and attractive, and are able to provide for the City's recovery
through the efficient and cost-effective distribution of goods, services, and passengers to the
City.*

LPC seeks the following changes to:

LURP, Priority 10: Amend Response 43 (additions underlined):

Ensure Sumner Road / Evans Pass Road is available for oversize and hazardous goods and for general traffic and is reopened to a level that ensures it is a resilient route to enable operation as a lifeline.

M A CLARKE AND WILLIAMS MCKENZIE TRUSTEES LIMITED, AGENT ELIOT SINCLAIR

Response 18 (to Priority 5 - see submission point (2) below) be amended to read (amended text emboldened and underlined);

R18 Statutory Direction: provide proposed Greenfield **and existing urban**

land-zoning provisions to the CER Minister in a manner that is aligned with the provision of core public and private infrastructure and services as set out in annual plans, three-year plans, long term plans and the Canterbury Regional Land Transport Programme.

Selwyn District ODP and rezoning provisions for Helpet Park (ODP Area 7), East Maddisons/Goulds Road (ODP Area 10) and Branthwaite Drive (ODP Area 11) to be provided to the CER Minister in 2013.

Waimakariri District rezoning provisions for South Belt/Townsend Road to be provided to the CER Minister in 2013.

MR HARRIS, AGENT ELIOT SINCLAIR

Amend the definition of rural residential in proposed Chapter 6 as follows; Residential units outside the identified priority; areas at an 'average density;' of between 1 and 2 households per hectare **Residential units outside the Urban Limits at an average density of no less than one per hectare**

MINISTRY OF EDUCATION

The Ministry made substantial suggestions to include education in the following descriptions contained within the RPS.

Introduction; 6.Issues; Issue 6.1.4 - Transport effectiveness; Objective 6.2.1 - Urban form and settlement pattern Principal reasons and explanation; Objective 6.2.2 Character and sustainability Principal reasons and explanation; Objective 6.23 - Enabling urban recovery, rebuilding and development; Policy 6.3.1 - Development within the Greater Christchurch area; Policy 6.3.1 Development within the Greater Christchurch area Principal reasons and explanation; Policy 6.3.8 Rural residential development Principal reasons and explanation; Policy 6.3.10 Monitoring and Review; Policy 6.3.10 Methods; Policy 6.3.8 Rural residential development Principal reasons an explanation; Policy 6.3.10 Monitoring and Review; Policy 6.3.10 Methods; Policy 6.3.5 – Integration of landuse and infrastructure; Policy 6.3.8 - Rural residential development; Policy 6.3.5-- Integration of land use and infrastructure; Policy 6.3.8 – Rural residential development; Strategic infrastructure;

PARK LANE ESTATES, AGENT FIONA ASHTON

Appendix 2: Canterbury Regional Policy Statement Amend first part of Policy 6.3.8 as follows¹:-

Rural residential development further to areas already zoned in district plans as at 1st January 2013 may be provided for by territorial authorities in accordance with adopted rural residential plans prepared in accordance with the Local Government Act 2002, ~~subject to the following~~; except that this restriction shall not apply to Selwyn District Council area until such time as a rural residential plan prepared in accordance with the Local Government Act 2002 is adopted by the Selwyn District Council.

PROGRESSIVE ENTERPRISES AGENT: PLANZ CONSULTANTS

Request for amendments to Chapter 6 of the Canterbury Regional Policy Statement.

That the objective and policy framework be amended as follows: Amend Objective 6.2.5 – Key Activity Centres to read:

Support and ~~maintain the existing~~ promote a network of Key Activity Centres ~~shown on Map A~~ as focal points for business, community and service activity during the recovery period, and include:

- (1) High quality and, where appropriate, mixed-use development supported by good urban design principles; and*
- (2) A diversity of business opportunities and increased residential development opportunities.*

The development and distribution of business activity which significantly impacts on the function and viability of these centres is to be avoided.

Amend Principal reasons and explanation to Objective 6.2.5 as follows:

It is important to maintain ~~the existing~~ a network of Key Activity Centres as focal points for business, community and service activity during the recovery phase and to support the identified priority areas. In addition, by virtue of their density, mix of activities and location on strategic transport networks, Key Activity Centres support the provision of public transport and intensification of residential activity within surrounding residential areas. This intensification will provide housing choice for those households needing to relocate, and will accommodate growth during the recovery period. Inappropriate development outside of Key Activity Centres may undermine the community's investment in these existing centres and weaken the range and viability of the services they provide.

Amend point (4) of Policy 6.3.1 – Development within the Greater Christchurch area, to read:

- (4) Avoid development that ~~adversely~~ significantly affects the function and viability of, or investment in, Key Activity Centres.*

Under Methods, amend the requirements of Territorial Authorities in relation to clauses (6) – (10) as follows:

Territorial Authorities: Will (6) Include objectives, policies or rules in district plans that identify and support development of key activity centres, and avoid commercial and industrial activities that could ~~adversely~~ significantly affect the function or viability, or investment in, those key activity centres.

~~(7) — Include objectives, policies or rules that limit inappropriate commercial activity outside of key activity centres.~~

(8) Identify areas suitable for future business land, and redevelopment of underutilised existing business land within existing urban areas.

(9) Review the Key Activity Centre framework and investigate and implement methods in district plans and through LTCCP's for promoting development and enhancement of Key Activity Centres. ~~Should~~

(10) Consider appropriate administrative and financial methods to enable and encourage key activity centres to fulfil their function, and to promote intensification of identified urban areas and brownfield development.

SOUTH HORT AGENT: PLANZ CONSULTANTS

1. South Hort requests that: a. the definition of “rural activity” in the RPS be amended so as to read: “Rural activities means: Rural land use activities such as agriculture, aquaculture, horticulture and forestry; Businesses that support rural land use activities, including land-extensive yard based garden, landscaping, and plant nursery activities.

THE RADFORDS, AGENT FIONA ASHTON

*Attitude to Response : Do Differently Changes Requested: Amend R33 as follows 1:-
R33 Statutory Direction: Develop and provide to the CER Minister Outline Development Plans and Business land zoning for District Plans to establish the broad land use pattern within selected Priority Areas for business, including consideration of wider connectivity to the surrounding areas and networks, so that individual landowner and developer aspirations are better managed and integrated (Hornby and Belfast). R34 Statutory Direction: Provide proposed Greenfield business land zoning provisions for all Priority Areas- Business identified on Map A of the LURP(Appendix 6) to the CER Minister in a manner that is aligned with the provision of core public and private infrastructure and aligned to vacant industrial/and monitoring.*

Workshop Question summary

Below the questions raised across all of the Workshops are synthesised.

Housing

Definitions and data

Questions were asked in relation to definitions of different concepts, such as what is Living G, what does promoting sustainable housing mean, and what is included under brownfield development. One question asked for a definition of *land*, in relation to whether the plan was effects versus activities based.

There were two questions related to the predictions of population growth used in the plan and how reliable they are. As well as questions about the data surrounding how many sections are needed compared to the supply, as well as what type of housing that should be provided on sections.

Density and location

Specific questions were asked about housing density in different locations and whether or not there has been a review or change to the density numbers. Questions on the location of housing related to whether the urban boundary is being looked at, how the different earthquake zones are accounted for and why particular areas are identified in certain ways, such as brownfield areas.

There were also two questions related to affordable housing, in particular what factors were causing problems and whether the market is being used to make things cheaper.

Maori Land

Most of the questions related to Maori land were about the number of sections and houses that can be developed at both Tuahiwi and Rapaki. As well as where that development can occur, particularly around the zoning of Rapaki. Other questions surrounded the involvement of council and CERA in the development through provision of technical expertise or whether Maori could do it themselves. The full transcript of the Hui held of 4 April is contained in the Annex document.

Land Use

Airport noise contours

Comments were made by one workshop participants about the lack of progress and restrictive nature of the contours.

Infrastructure

Questions were raised about specific areas where infrastructure is needed, how it will be linked together and the timing in which it will be provided.

There were questions specific to transport infrastructure, in particular cycle safe routes, how transport corridors are decided and the impact of more people moving through existing neighbourhoods.

There were questions about the inclusion of community and green infrastructure and where they fit within the Plan, these were responded to by highlighting that the plan needs to be integrated with other Recovery Programmes as well.

Rural Residential

There were two questions relating to rural residential land zoning, in particular whether subdividing rural residential is brownfield development and whether there is anything being done about the amount of rural residential development.

Business

Key Activity Centres

Questions were asked about the extent to which Council will be involved in the development of Key Activity Centres (KAC) and how the concept of KACs will be given effect to. The need for focus on particular KACs was questioned, such as Belfast and one participant asked why Sydenham had not been developed more.

Location of business

Two questions were asked about the need to consider what will happen when the 2016 temporary business resource consents run out and the need for temporary business accommodation while repairs take place. Another question was about the lack of business land available for heavy/wet industry.

Plan Process

Out of scope

There were three questions asked about things that are out of the Plan's scope, related to: informing and directing things out of scope; flood protection and development on TC3 land; whether out of scope issues are being picked up elsewhere.

Process and timeframes

There were a number of questions surrounding the process that is being taken in developing the plan, such as: what happens when the plan gets to the Minister; will priority be given to certain options; council and NZTA involvement in the process; assumptions that have been made and reporting of the consultation process. The influence of the plan was questioned as to how change will occur and whether it will change what has occurred in other processes. Two questions were also raised about the name of the plan and how it is misleading.

Questions were asked about the timeframe before development will be able to take place and how that will be matched up with infrastructure and the planning processes that need to take place. Four questions were asked about the implementation of the plan in terms of who will take the leadership of different aspects and how what is in the plan will actually take place.

Relationships with other plans

There were questions asked about how the LURP relates to other plans, such as the CBD plan, UDS, RPS, DPs RMA review, and council 3 year plan.