

Recommendations on Changes to the Draft Land Use Recovery Plan as a result of Written Comments

Section 1: Overall Strategy

#	Issue	Considerations			Appropriateness for Land Use Recovery Plan	Strategic Partner Advice	Discussion	Necessity for use of CER Act Powers to make changes to the draft LURP	Recommendation to the Minister for CER
		CER Act	Recovery Strategy	Minister's Direction					
1.	Residential Growth Direction Does the draft Land Use Recovery Plan provide an appropriate direction for growth including the balance of new greenfield areas and intensification of existing urban areas?	Purposes: (a), (d), (f) and (g)	Goals: 2.1, 5.1, 5.3, 5.4, 5.5, 5.6	Clauses: 2.2 A (i) 2.2 C (v), (vi) 2.5	The identification of priority areas for development is specifically identified as a requirement for the Land Use Recovery Plan under the Minister's direction.	No change. Advice received on written comments included noting the strong support in some comments for intensification in appropriate existing urban areas in the Land Use Recovery Plan, and that the Land Use Recovery Plan balances the need for rebuilding existing communities with the need for new urban land to provide for housing choice and the needs of a growing population. The existing CCC South-West Area Plan work, and Master Plans for New Brighton, Sumner and Ferry Road were also noted.	Written comments included the following issues: <ul style="list-style-type: none"> - Existing suburbs should be redeveloped over new outlying development - Releasing more land will increase housing affordability - Support for the greenfield areas identified in the Land Use Recovery Plan - Need to develop flexibly to ensure there is enough land that can be developed quickly and in areas not subject to constraints - Concern about, and advocacy for, the location of development near northern and southern motorway corridors - Concern about urban sprawl, that a sprawling city will be unsustainable and growth should be located close to the centre - Suggestions that more land should be considered for rezoning The CER Act purposes include the recovery of communities (a) and measures taken under it are meant to ensure a focused, timely and expeditious recovery (d). The Recovery Strategy includes goals to have well-functioning centres (2.1), invest in and rebuild infrastructure in a cost effective manner and develop a transport system that meets the needs of people and businesses (5.1,	There is no need to use CER Act powers to make changes to the draft LURP as the existing position is supported	That the Land Use Recovery Plan retain the balance and growth direction provided by greenfield priority areas and redevelopment incentives provided in the draft Land Use Recovery Plan.

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							<p>5.3 and 5.4), and support the redevelopment of existing urban land. However the Recovery Strategy also includes a goal of zoning sufficient land for recovery (5.5).</p> <p>The Minister's Direction requires the Land Use Recovery Plan to identify priority areas for recovery in light of the earthquakes – but does not constrain identification of these to within the city boundaries.</p> <p>There is demand for new residential development on the northern, western and south-western edges of the city and there are also calls to protect redevelopment opportunities right in the city. The draft Land Use Recovery Plan proposes a mixture of re-development within the city and some greenfield development on the outskirts and outside the city to provide for a range of housing choices as well as reflecting the new hazard profile of the city and ensuring infrastructure can be delivered to support development.</p> <p>Attempting to focus all the redevelopment of the existing urban area in the east (as the city centre is subject to the Christchurch Central Recovery Plan and therefore out of scope of the Land Use Recovery Plan) seems unlikely to result in a focused, timely and expeditious recovery or result in restoration of community well-being as it would also contrast starkly with demand for new subdivisions out to the north, west and south and almost certainly constrain rather than expedite the</p>		

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							<p>recovery in the interim.</p> <p>By contrast, focusing just on enabling new greenfield development on the northern, western and southwestern edges of the city risks undermining the recovery of the city centre and “stranding” the substantial investment current and proposed for the city centre</p> <p>The overall balance provided in the draft Land Use Recovery Plan between the availability of greenfield land for new development and redevelopment of existing urban land seems appropriate and should be retained.</p> <p>Some additional greenfield land may need to be included in particular circumstances, as discussed in ‘Housing Supply and Demand’ below.</p> <p>Additional opportunities to achieve the desired levels of residential development within existing urban areas may also be required, and this is addressed below.</p>		
2.	<p>LAND USE RECOVERY PLAN</p> <p>Are the provisions restricting where urban development can occur appropriate for the Recovery Plan?</p>	(d) and (f)	1.1, 2.1, 5.1, 5.3, 5.5, 5.6	2.2 A (i)	This issue relates to much of the nature and policy direction of the draft Land Use Recovery Plan	No specific advice provided.	<p>Written comments raised the issue of the identification of priority areas and suggested that associated policies within the proposed RPS Chapter 6 would limit rather than enable recovery due to the resulting constraints on where development can and cannot occur.</p> <p>The RPS identifies greenfield priority areas for residential and business development as required by the Minister’s direction. Greenfield development is then restricted to</p>	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make an amendment to the draft LURP to refer to a monitoring and reporting plan to be developed for the implementation of the LURP.	That the policies of the draft Land Use Recovery Plan that identify priority areas and restrict the development of residential and business activities to these areas be retained.

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							<p>these areas for the life of the Recovery Plan under policies set out in Appendix 2 (Policy 6.3.1 (3)).</p> <p>The restrictiveness of the Recovery Plan for development within the identified priority areas provides certainty for planning and infrastructure provision and avoids ad hoc development that may lead to undesirable outcomes such as inefficient infrastructure provision or residential development in areas not sufficiently serviced by community facilities.</p> <p>This is consistent with the purposes of the CER Act, particularly those set out in section 3 (d) and (f), and the goals of the Recovery Strategy, particularly goals 1.1, 5.1 and 5.5. This is also considered to be consistent with Clause 2.2 A (i) of the Minister's direction.</p> <p>RPS Chapter 6 includes Policy 6.3.11 which is a requirement for Canterbury Regional Council to monitor and potentially review the plan if a shortfall in available land is identified.</p> <p>A monitoring and reporting plan will be developed and integrated with the wider Recovery Strategy monitoring and reporting plan, which will assist in identifying changes required to the LURP in relation to the identification of further greenfield priority areas in the future should they be required.</p> <p>It is therefore considered that the policy of the draft Land Use</p>	<p>It is considered that the amendments would be consistent with section 3(d) and (f) of the CER Act and goal 1.1, 1.3 and 5.5 of the Recovery Strategy</p>	

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3.	Key Activity Centres Are the provisions for and selection of Key Activity Centres appropriate?	Purposes: (a), (f) and (g)	Goals: 1.1, 2.1, 2.8, 2.11, 5.1, 5.3	Clauses: 2.2 C (vi)	The Minister's direction specifically includes the recovery and rebuilding of the network of centres of activity as a matter to be addressed by the Land Use Recovery Plan	Retain existing provisions with the exception of Halswell Key Activity Centre. CCC supports the move of the location of the Halswell Key Activity Centre. This proposal is in line with the outline development plan which CCC is currently developing for this area. Should the movement of the Key Activity Centre to the greenfield priority area on map be considered too much of a departure from the draft Land Use Recovery Plan, CCC supports more flexibility in the wording around the Key Activity Centre in Halswell as "indicative only".	Written comments raised: <ul style="list-style-type: none"> - General support for the KAC approach to development was stated, in particular for the identification of Northlands, Styx Centre, Riccarton and Hornby as Key Activity Centres - that Key Activity Centres should be defined as B2 land surrounded by medium density residential; - that Key Activity Centre growth must be in balance with the catchment that it is designed to serve; - for strategies to be put in place to cater for future transport growth to Key Activity Centres; - concern that Christchurch City Council Plan Change 56 will be driving Key Activity Centres - Amendments to objective 6.2.5 <i>Key activity and other centres</i> were requested to clarify the definition and relative location of residential zoning around Key Activity Centres. - some comments suggested rebuilding communities is more important than Key Activity Centre development. - changes to the location of the Halswell Key Activity Centre were requested and it was suggested 	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the LURP document and Appendix 2 to clarify the role and function of Key Activity Centres and neighbourhood centres so that the supporting policies in Appendix 2 are applied appropriately. It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make an amendment to Action 24 as proposed in the draft LURP so that the KACs are geographically defined in the relevant district plan to ensure certainty for residents and	That the Land Use Recovery Plan and Appendix 2 RPS Chapter 6 be amended to ensure that the role and function of Key Activity Centres and neighbourhood centres in relation to the CBD and other business areas is clear. Also that appropriate Actions be amended to require that the KACs are mapped through appropriate zoning. That the Halswell Key Activity Centre be relocated as shown on the revised Map A.

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							<p>Sumner be included as a Key Activity Centre.</p> <p>Changes to land use policy and planning provisions through the Land Use Recovery Plan for the redevelopment of Key Activity Centres are consistent with purposes (a), (f) and (g) of the CER Act, and goals 1.1, 2.1, 2.11, 5.1 and 5.3 of the Recovery Strategy.</p> <p>However, if the provisions are too restrictive this would risk not supporting goal 2.8 of the Recovery Strategy and may lead to investment not occurring, rather than being directed to the activity centres and central city.</p> <p>Therefore, the provisions supporting the recovery of Key Activity Centres need to be strong enough to ensure that investment in office and retail development are directed to the Key Activity Centres, while not leading to potential investment being lost altogether.</p> <p>The draft Land Use Recovery Plan identifies key activity centres to consolidate and integrate the growth of business, retail, recreation and community activities; as a focal point for the transport network, and suitable for more intensive mixed use development, where mixed use development includes a range of activities including commercial and residential.</p> <p>The development of these areas differs from "neighbourhood centres" which range from a collection of shops to a retail complex. Industrial areas are also considered</p>	<p>investment.</p> <p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make an amendment to Map A of Appendix 2 as proposed in the draft LURP to relocate the Halswell KAC to a more appropriate location so that the centre is able to be developed and appropriately service the expected growth in the area.</p> <p>It is considered that the amendments would be consistent with section 3(d) and (f) of the CER Act and goal 1.1, 2.1 and 2.11 of the Recovery Strategy</p>	

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							<p>separately.</p> <p>The written comments were focused on seeking clarity around Christchurch City Key Activity Centres.</p> <p>The Land Use Recovery Plan [Action 24 ii – iv of draft Land Use Recovery Plan] requires that CCC provide, through the district plan review, for:</p> <ul style="list-style-type: none"> - revitalisation of the definition and extent of each Key Activity Centre via appropriate zoning; - planning provisions for Key Activity Centre and neighbourhood centres that have undergone a suburban masterplan process; and - mixed use development within Key Activity Centre. 		
4.	<p>Selection of Priority Areas</p> <p>Is the overall strategy for selection of residential greenfield priority areas the most appropriate?</p>	Purposes: (a), (d), (f) and (g)	Goals: 1.1, 1.2, 2.1, 5.1, 5.2, 5.3, 5.5, 5.6 and 5.7	Clauses: 2.2 A (i), 2.2 B (iii), 2.2 D	The Minister's direction specifically requires the identification of residential and business priority areas to support recovery.	No specific advice provided.	<p>Written comments received included noting that there is a need for transparent, robust criteria for the selection of greenfield land, and that development should be avoided on land subject to natural hazard concerns.</p> <p>The identification of priority areas to support recovery is consistent with purposes (a), (d), (f) and (g) of the CER Act, and goals 1.1, 2.1 and 5.5 of the Recovery Strategy.</p> <p>The identification of priority areas to support recovery is required by the Land Use Recovery Plan under the Minister's direction.</p> <p>Section 2.2 of the draft Land Use Recovery Plan identifies relevant</p>	There is no need to use CER Act powers to make changes to the draft LURP as the existing position is supported.	That the overall strategy for Greenfield and Business Priority Areas in the draft Land Use Recovery Plan be adopted in the Land Use Recovery Plan.

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							<p>goals of the Recovery Strategy. This includes “zoning sufficient land for recovery needs within settlement patterns consistent with an urban form that provides for the future development of greater Christchurch”.</p> <p>Appendix 2 to the draft Land Use Recovery Plan (proposed Chapter 6 of the RPS) includes detail on the considerations that have been taken into account in the identification of priority areas. These have been reviewed and are consistent with the Minister’s direction and the Recovery Strategy.</p> <p>Many of the priority areas are already zoned for development or are in the process of being zoned.</p> <p>Remaining areas are required to be authorized as an Action in the Land Use Recovery Plan.</p> <p>There were few written comments opposing specific priority areas. Written comments seeking additional priority areas are addressed in Sections 3 and 4.</p>		
5.	Residential Red Zone Is the manner in which the Residential Red Zones are addressed appropriate?	Purposes: (a), (b), (d), (f), and (g),	Goals: 5.3, 5.7	Clauses: 2.8	Not appropriate to address.	No change. Section 5 of the draft Land Use Recovery Plan states that this is to be dealt with through other processes.	<p>Some written comments recommended that a public process be put in place for the future development of red-zoned land.</p> <p>Due to Clause 2.8 of the Minister’s Direction the future use of “red-zoned” land is not able to be addressed in the Land Use Recovery Plan</p>	There is no need to use CER Act powers to make changes to the draft LURP as the existing position is supported.	That no changes are made in the Land Use Recovery Plan to address the residential red zone in the Land Use Recovery Plan.

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6.	Health Is the link to public health strong enough?	Recovery Definition: restoration and enhancement Purposes: (g)	Goals: 3.3, 3.4 and 5.3	Clauses: 2.7 – the Land Use Recovery Plan may not direct or implement changes to health services	Health services are out of scope due to clause 2.7 of the Minister's direction, The impact of urban development on health is not specifically identified as a matter to be addressed.	Review and amend Land Use Recovery Plan to include reference to relationship between land use planning, and health and wellbeing. Some specific changes are recommended.	<p>Written comments received noted that the association between land use and population health needs to be more explicit, that sufficient land for health facilities needs to be provided.</p> <p>Land use policies and development can impact health through a variety of mechanisms, such as providing for adequate residential living space, and provision of community facilities and open spaces.</p> <p>The potential impact of urban development on the health of residents could be linked to purpose (g) of the CER Act and the definition of recovery and including enhancement, and some of the goals of the Recovery Strategy, particularly under the social component (3.3 and 3.4).</p> <p>However infrastructure provision for Health Services is specifically identified as outside the scope of the Land Use Recovery Plan.</p> <p>The draft LURP includes reference to positive public health outcomes in relation to areas such as public and active transport.</p> <p>While the link between land use planning and public health outcomes is recognized, it is not considered necessary to explicitly state this in the Recovery Plan.</p>	There is no need to use CER Act powers to make changes to the draft LURP.	That no changes are made to the Land Use Recovery Plan.
7.	Sustainability Are provisions relating to	Purposes: Recovery Definition: restoration	Goals: 1.7, 5.2, 5.3, 5.4, 6.1	Clauses: 2.7 non-land use resources	Only land use-related sustainability issues can be considered.	No change. It is not appropriate to 'require' these within the	Written comments noted that a sprawling city will be unsustainable, while others advocated for the incorporation of requirements for	There is no need to use CER Act powers to make changes to the draft LURP as	That no changes are made to the Land Use Recovery Plan given the additional costs such

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	sustainability appropriate?	and enhancement Purposes: (f) and (g)		may be considered but not specifically addressed by the Land Use Recovery Plan		District Plan for Greenfield developments. They should be encouraged, and current ways to incentivise uptake of these systems should be reviewed.	<p>sustainability-enhancing development practices such as solar orientation and more efficient technologies for resources such as rain water and energy in dwellings.</p> <p>The comments relating to urban sprawl are addressed in (1) above.</p> <p>Efficiency enhancing technologies are supported by purpose (g) of the CER Act, specifically in relation to environmental wellbeing, and some Recovery Strategy goals (such as 5.3).</p> <p>While the recovery of non-land use resources are not matters for the Land Use Recovery Plan to address due to clause 2.7 of the Minister's Direction, the impact of land use development on these resources may be able to be considered.</p> <p>Sustainability is included in Objective 6.2.3 (5) of Appendix 2, which includes environmental sustainability of recovery and rebuilding activities, and Policy 6.3.2 (6) of Appendix 2 includes environmentally sustainable design.</p> <p>Therefore it is considered that the draft Land Use Recovery Plan appropriately covers sustainability considerations, and specifically environmental sustainability of land use development.</p>	the existing position is supported	sustainability measures would impose.

Section 2: Rebuilding Communities

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		CER Act	Recovery Strategy	Minister's Direction	Land Use Recovery Plan	Advice		of CER Act Powers to make changes to the draft LURP	the Minister for CER
8.	Intensification Does the Land Use Recovery Plan go far enough to promote and provide for infill and intensification?	Purposes: (a), (d), (f) and (g)	Goals: 1.1, 3.4, 5.3	Clauses: 2.2 B (iv) 2.2 C (v)	The Land Use Recovery Plan is required to provide for a range of housing types, and provide for intensification of use and comprehensive development of suitable brownfield sites.	No change to the Land Use Recovery Plan, as intensification is well supported through the Plan.	<p>Some written comments expressed preference for intensification over greenfield housing. The <i>Greater Christchurch Housing Market Assessment August 2013</i> confirms that there is particular short term stress in the rental sector while in the longer term greenfield supply is likely to more than meet demand.</p> <p>The draft Land Use Recovery Plan identifies the scope for infill and intensification. However this is a theoretical development capacity based on current plan provisions and average lot size and bears little relationship to what might be feasible.</p> <p>In summary it is proposed that the Land Use Recovery Plan be strengthened in terms of enabling intensification and infill to meet the targets set in the draft Land Use Recovery Plan.</p> <p>The draft Land Use Recovery Plan requires the delivery of a "floating zone" to provide a consent framework for enabling intensification and infill. This is addressed in more detail elsewhere but in summary it provides the opportunity for a significant level of intensification on land within reasonable proximity to services, open space and public transport in the existing Living 2 and Living 3 zones. In addition other urgent changes to the Christchurch City District Plan are proposed to take advantage of current opportunities for intensification arising from residential demolitions, including:</p>	<p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to strengthen the enablement of infill and intensification in order to ensure the required levels of housing development in greater Christchurch for recovery.</p> <p>It is considered that the amendments would be consistent with section 3(d) and (f) and (g) of the CER Act, and goals 1.1, 3.4 and 5.3 of the Recovery Strategy</p>	That the Land Use Recovery Plan be amended to include an explanation of the changes proposed and inclusion of additional plan changes to the Christchurch City District Plan to enable appropriate intensification.

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							<ul style="list-style-type: none"> Conversion of an existing dwelling into two units Conversion of a family flat to a residential unit Building two units on a vacant site Conversion of an existing elderly persons housing unit to a residential unit <p>It is also proposed to include a Community Housing Redevelopment Mechanism to enable redevelopment and intensification within ten specified areas of the City where there are clusters of community housing. This will enable redevelopment of damaged community housing to be designed to meet the current needs of these groups.</p>		
9.	Housing Affordability Does the Land Use Recovery Plan go far enough in addressing the issue of housing affordability?	Purposes: (a), (f) and (g)	Goals: 1.1, 3.4, 5.3 and 5.6	Clauses: 2.2 B (iv)	Changes to land use policy and planning provisions to provide for affordable housing are specifically identified in the Minister's Direction and therefore appropriate to be dealt with in the Land Use Recovery Plan.	<ul style="list-style-type: none"> Include action to research housing affordability in greater Christchurch. Amend Action 7 to reference smaller housing Amend the definition of affordable housing and other areas of the Land Use Recovery Plan to reference <ul style="list-style-type: none"> life costs of poorly designed, constructed or located housing, including transport costs accessibility / 	<p>The draft Land Use Recovery Plan includes a section specifically on housing affordability and links this issue to a range of other current Government and voluntary sector initiatives.</p> <p>Written comments received sought greater direction around ensuring more affordable housing outcomes and sought the inclusion of accessibility factors in the definition of affordable housing (covered in 'Accessibility' below).</p> <p>The draft Land Use Recovery Plan proposes that exemplar projects be developed to showcase good quality medium density development. Progress has been made in this area and a list of potential exemplar</p>	<p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to strengthen housing affordability outcomes, and provide greater clarity about the proposed exemplar projects, to ensure that appropriate affordable housing is delivered.</p> <p>It is considered that</p>	<p>That the Land Use Recovery Plan be amended to include further measures to strengthen housing affordability outcomes and update the position with regard to exemplar projects and provide clearer actions and timetables around these.</p> <p>Additional proposed urgent interventions in the District Plan are identified in revised Land Use Recovery Plan (as in recommendation 8 above).</p>

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						universal design	<p>projects is proposed to be included in the final Land Use Recovery Plan. These are required to provide for affordable housing and mixed tenure incorporating high quality design and energy efficiency.</p> <p>Further measures are also proposed to incentivise more housing affordability outcomes, including those listed under 'Intensification' above, including the Community Housing Redevelopment Mechanism.</p>	the amendments would be consistent with section 3(d), (f) and (g) of the CER Act, and goals 1.1, 3.4, 5.3 and 5.6 of the Recovery Strategy	
10	<p>Brownfield Development</p> <p>Are the provisions for brownfield development clear and appropriate and are they likely to result in uptake?</p>	Purposes: (a), (d), (f) and (g)	Goals: 2.1, 5.1, 5.3, 5.4, 5.5	Clauses: 2.2A (i) 2.2 C (v)	Comprehensive development of brownfield areas specifically mentioned in the Minister's direction.	<p>No change.</p> <p>It was noted that incentives for brownfield redevelopment need to remain as these often face more difficulties than greenfield development.</p>	<p>Written comments considered that land contamination should be addressed in brownfield developments and specifically referenced in the Land Use Recovery Plan. They also raised that there should be development of highest demand brownfield land first to efficiently provide infrastructure.</p> <p>The draft Land Use Recovery Plan [Action 8] requires "councils and central government, in collaboration with developers, to identify and implement mechanisms to facilitate and enable comprehensive development of identified brownfield sites for housing, mixed use or commercial activities".</p> <p>In addition the draft Land Use Recovery Plan [Action 24 (i), 25 (i), and 26 (i)] and RPS Chapter 6 requires councils to provide for "comprehensive developments in existing urban areas; including brownfield sites". This is in accordance with Clause 2.2C (v) in the Minister's direction in that it provides for "identification of use and</p>	There is no need to use CER Act powers to make changes to the draft LURP as the existing position is supported	That no changes are made to the Land Use Recovery Plan to address this issue.

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							comprehensive development on suitable brownfield areas". Regional Policy Statement Chapter 6 further requires that the three affected district councils should "within six months of the Regional Policy Statement becoming operative, identify appropriate brownfield sites": Councils and other agencies will, through the process of identification of sites, address matters such as the brownfields sites suitability for the type of or mix of development proposed.		
11	Schools and Hospitals Should specific planning issues for schools and hospitals be addressed in the Land Use Recovery Plan?	Purposes: (a), (f) and (g)	Goals: 1.1 and 3.3	Clauses: 2.7	Under Clause 2.7 of the Minister's direction the Land Use Recovery Plan cannot direct or implement changes to educational or health facilities. Other Government and other processes are more appropriate for address these issues.	No change. The matters raised can be considered through the review of the Christchurch City Plan.	Some written comments request the Land Use Recovery Plan to direct changes to district plans to address issues for the redevelopment of certain schools and hospitals. Addressing issues faced by schools and hospitals that require redevelopment due to damage by the earthquake may help to achieve purposes (a), (f) and (g) of the CER Act and goals 1.1 and 3.3 of the Recovery Strategy. Educational and hospital facilities are specifically identified in Clause 2.7 of the Minister's direction as matters upon which the Land Use Recovery Plan must not provide explicit direction.	There is no need to use CER Act powers to make changes to the draft LURP as the existing position is supported	That no changes are made to the Land Use Recovery Plan for planning provisions relating to schools and hospitals.

Section 3: Building New Communities

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12.	Housing Demand and Supply Should the Land Use Recovery Plan provide for further greenfield priority areas to address housing recovery needs?	(a), (d), (f) and (g)	1.1, 3.4, 5.1, 5.3, 5.5, 5.6	2.2 A (i) 2.2 B (iv)	Ensuring an adequate supply of housing is a key component of the Land Use Recovery Plan, particularly through Clause 2.2 of the Minister's direction.	The strategy partners generally do not support additional greenfield priority areas given the amount already provided for. However there are some exceptions that are addressed below	Written comments have sought inclusion of further particular parcels of land in the Land Use Recovery Plan as greenfield priority areas. The total additional land sought for inclusion in the Land Use Recovery Plan is over 525 hectares for greenfield development. The recently completed Greater Christchurch Housing Market Assessment supports the position in the Land Use Recovery Plan that ample greenfield priority areas have been identified to meet the demands over the recovery period with considerable scope for housing choice. There is a risk that if significant greenfield priority areas are added to the Land Use Recovery Plan then infill and intensification within existing damaged residential areas will not occur despite the changes proposed to the Land Use Recovery Plan and the benefits of prioritisation of related transport and infrastructure spending will be diluted.	The need for the use of CER Act powers to make changes to the draft LURP is addressed below.	That the greenfield priority areas not be significantly increased during the recovery period unless monitoring demonstrates a need. Some exceptions to this are recommended in 12.1 below.
12.1	Are there any special cases for greenfield areas justifying departure from decision under 'Housing Supply and Demand'?					Riccarton Racecourse: CCC agrees with this recommendation.	One special case has been identified from the written comments received and has been considered by the strategic partners. Riccarton Racecourse: The landowner is seeking inclusion of surplus land on the southern side of the racecourse as a greenfield priority area. The owner has had discussions with CCC. CCC considers this project has potential to be a medium density exemplar project and officials agree with this	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to include Riccarton Racecourse as a potential site for a 'exemplar' housing development in the	Riccarton Racecourse: That the Land Use Recovery Plan not be amended to show this site as a greenfield priority area, as it is within the existing urban area, but that the owner is invited to join a process of design and testing as an exemplar project, with this site listed as a potential 'exemplar' site in the

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							<p>course of action.</p> <p>In the event that the detailed project design is approved as an exemplar specific measures will be required to be taken to authorize the development. This is likely to involve a change through the District Plan review</p>	<p>relevant LURP action</p> <p>It is considered that the amendments would be consistent with section 3(d), (f) and (g) of the CER Act, and goals 1.1, 3.4, 5.3 and 5.6 of the Recovery Strategy</p>	relevant LURP action..
12.2	Should additional plan changes be included in the Land Use Recovery Plan for proposed greenfield priority areas?					<p>Strategic partner advice is consistent with these recommendations</p>	<p>A large number of those providing comment own or have an interest in land within a draft Land Use Recovery Plan greenfield priority area and sought to have the authorization of development of their land advanced by way of Plan Change enacted through the Land Use Recovery Plan, such as the case for Highstead. Some of these are part way through a plan change process while others have proposals that have had limited investigation and assessment.</p> <p>A number furnished very detailed proposals but with no evidence that affected parties had been consulted.</p> <p>Each of the proposals has been considered but as many lacked sufficient information, the advice from the relevant Council on the proposal was important to consider. In general our assessment is that such plan changes should be subject to some form of public process and the CCC District Plan review process and plan changes in Wamakariri and Selwyn Districts are the appropriate</p>	<p>67 Brick Kiln Lane, Rangiora PC 18 WDC</p> <p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to include 67 Brick Kiln Lane in the relevant greenfield priority area, in order to resolve this issue and ensure expeditious recovery.</p> <p>It is considered that the amendment would be consistent with section 3(d), (f) and (g) of the CER Act, and goals 1.1 and 5.5 of the Recovery Strategy</p>	<p>That no additional plan change be included in the Land Use Recovery Plan for greenfield priority areas except, for the reasons set out in the discussion, the specific changes relating to:</p> <p>67 Brick Kiln Lane Rangiora: Waimakariri District Plan.</p> <p>Highfield Park Ltd Christchurch City District Plan</p> <p>Lincoln ODP 3 Amendment: Selwyn District Plan</p> <p>Prebbleton (ODP Area 3) Greenfield Priority Area: Selwyn District Plan</p>

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							<p>processes for assessing these changes.</p> <p>It is therefore recommended that the Land Use Recovery Plan not be amended to include additional plan changes for greenfield priority areas with the exception of the following:</p> <p>67 Brick Kiln Lane, Rangiora PC 18 WDC This matter is at appeal but the ODP and provisions now proposed by the land owner are supported by WDC. The site is adjacent to a wider greenfield priority area. Given the stage that this matter has reached it is considered appropriate to address this by way of a Land Use Recovery Plan change.</p> <p>Highfield Park Ltd PC 67 CCC This plan change provides for 200 hectares of integrated development and there are four appeals. These have been subject to specific review as part of this process.</p> <p>Concern from landowners has been expressed relating to the use of their land as a receiving area for stormwater in the Outline Development Plan. The land in concern would have to be acquired to be used for stormwater. This land is zoned as residential in the proposed plan change so the landowner can follow RMA processes to develop land but would need to resolve stormwater drainage issues for their property.</p> <p>Lincoln ODP Area 3</p>	<p>Highfield Park Ltd PC 67 CCC It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to include the provisions in PC67 to the Christchurch City District Plan in Appendix 3 to zone Highfield Park, in order to resolve this issue and ensure expeditious recovery.</p> <p>It is considered that the amendment would be consistent with section 3(d), (f) and (g) of the CER Act, and goals 1.1 and 5.5 of the Recovery Strategy.</p> <p>Lincoln ODP Area 3 It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to adjust the boundary of the Lincoln ODP Area 3, in order to</p>	

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							<p>This involves a proposed amendment to the boundary of the operative ODP Area 3 at Lincoln to bring the boundary in line with existing cadastral boundaries authorizing a further six hectares of development. This is described by SDC as a previous oversight and is supported by SDC.</p> <p>Prebbleton ODP Area 3 This involves a proposed amendment to the boundary of the Greenfield Priority Area at Prebbleton (ODP Area 3) to bring the boundary in line with existing cadastral boundaries authorizing a further four hectares of development. This is supported by SDC, with the ODP to be amended through Action 15 of the LURP.</p> <p>Spreydon Lodge This specific proposal is noted because the applicant has furnished extensive information in the written comments and, while there is considerable support for the concept proposed, the matter is not sufficiently well advanced and tested to be able to consider including a plan change as part of the Land Use Recovery Plan. However, it is recommended that the first stage of this development is invited to be an exemplar project. As noted in 12.1 above the Christchurch City District Plan review will provide the appropriate process for assessing plan provisions for this development.</p>	<p>resolve this issue and ensure expeditious recovery.</p> <p>It is considered that the amendment would be consistent with section 3(d) and (f) of the CER Act, and goals 1.1 and 5.5 of the Recovery Strategy.</p> <p>Prebbleton ODP Area 3 It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to adjust the boundary of the Prebbleton ODP Area 3, in order to resolve this issue and ensure expeditious recovery.</p> <p>It is considered that the amendment would be consistent with section 3(d) and (f) of the CER Act, and goals 1.1 and 5.5 of the Recovery Strategy.</p>	

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13. eeds	Accessibility Should accessibility of housing be an issue addressed by the Land Use Recovery Plan?	Recovery Definition: restoration and enhancement Purposes: (f) and (g)	Goals: 3.4, 5.2, 5.3 and 5.4	Clauses: 2.2 B (iv)	The Ministers Direction does not specifically rule accessibility in or out of scope of the Land Use Recovery Plan. However, it may be able to be considered within the requirement for a 'diverse range of housing types'.	The Building Act covers building design, but it would be appropriate to review District Plan provisions that could improve accessibility, particularly transport. Amend Action 52: Christchurch Housing Development Forum brief to include accessible housing. Amendments in relation to affordable housing definition in 'Housing Affordability' above..	A number of written comments noted the need for a greater emphasis on accessibility and universal design in the Land Use Recovery Plan. This included comments that; exemplar developments should meet Lifemark 3 standards, developments should provide for adaptable and accessible housing needs, and that the Land Use Recovery Plan should provide for Universal Design principles. A particular theme was that affordable housing should include accessibility aspects, as noted in (9) above. Providing for accessible buildings would help to achieve the purposes of the CER Act particularly under 3(g) and could be considered to fall under the enhancement component of recovery. The goals of the Recovery Strategy also support accessibility. However, the Building Act is the main piece of legislation that determines the level of accessibility requirements for new buildings. The Land Use Recovery Plan cannot direct changes to this Act. The requirement to provide for a diverse range of housing types (Clause 2.2 B (iv)) could be considered to include providing for accessible housing. There is also a tension in that prescriptive methods for increasing accessibility requirements may act as a disincentive for investment in housing, particularly affordable housing.	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to include accessibility in the relevant action relating to advice to be provided to councils from the Canterbury Sustainable Homes Working Party. It is considered that the amendment would be consistent with section 3(g) and of the CER Act, and goals 3.4, 5.2, and 5.3 of the Recovery Strategy.	Amendments should be made to the draft Land Use Recovery Plan to include accessibility as part of the advice to be provided to the councils from the Canterbury Sustainable Homes Working Party.

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							<p>It is recognized that the RPS Chapter 6 includes Policy 6.3.2 – Development form and urban design. This includes reference to the New Zealand Urban Design Protocol, which incorporates accessibility considerations. Clause 6.3.2(3) – Connectivity includes ‘barrier free’ connections as a consideration. Discussion of urban design in the LURP should retain reference to accessibility considerations.</p> <p>Written comment from the Canterbury Sustainable Homes Working Party included significant reference to accessibility and universal design. The relevant action for the Party to provide advice to councils should include accessibility as a consideration.</p>		
14.s	<p>Rural Residential</p> <p>Should the Land Use Recovery Plan make provision for additional Rural Residential land in Christchurch City?</p>	Purposes: (f), (g) and (d)	Goals: 1.1 and 5.5	Clauses: 2.2 A 2.2 B (iv)	The provision of a diverse range of housing types is identified in the Minister's direction for the Land Use Recovery Plan. Rural residential may be considered to be a desirable housing type.	<p>CCC considers that the provision of ‘rural-residential’ land is inconsistent with the primary urban growth objective of urban consolidation. In addition, increased land fragmentation will make it more difficult to fully develop this land some time in the future if or when it is needed for urban residential purposes.</p>	<p>A number of written comments sought additional opportunities for rural residential land in Christchurch City and a group of submitters at John Patterson Drive in Halswell specifically sought provision in this location.</p> <p>The Land Use Recovery Plan direction did not specifically require rural residential activities to be considered although this is a subset of residential activities.</p> <p>The proposed RPS chapter includes specific policy requiring that there be no additional rural residential provision in Christchurch City in order to ensure land at the periphery is used efficiently and future potential for urban growth not affected.</p>	No need to use CER Act powers as a change is not required to the draft LURP	That no amendment to the Land Use Recovery Plan be made in response to this issue.

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							<p>Provision is to be made for rural residential development in Waimakariri and Selwyn Districts and the City Plan currently provides for lower density living in the Living 1B and HA zones.</p> <p>It is considered that the restrictions in the current draft LURP on further rural residential development are appropriate.</p>		
15.	Larger Sections / Family Homes Does the range of housing choice provided for include enough larger sections / family homes?	Purposes: (f) and (g)	Goals: 3.4, 5.2, 5.3, 5.5 and 5.6	Clauses: 2.2 A 2.2 B (iv)	The Minister's Direction expressly includes the mix of residential activities and a diverse range of housing types as matters to be dealt with in the Land Use Recovery Plan.	No change to Land Use Recovery Plan. The density yield provisions in the proposed Chapter 6 of the RPS allow larger sections to be developed as long as the overall density meets the requirement, and only apply to new greenfield areas or intensification areas.	<p>Some written comments noted that more provision should be made in Land Use Recovery Plan for larger sections and family homes.</p> <p>Providing for larger sections may help to achieve the purposes of the CER Act, particularly (f) and (g) through providing sections for displaced people wanting larger sections.</p> <p>The provision of quality housing (3.4) and a range of affordable housing options (5.8) are also supported by the Recovery Strategy goals. However, so too are rebuilding buildings in a cost-effective and energy-efficient manner. Goal 5.3 includes the tension between zoning sufficient land of recovery, while also doing this with a view for the future urban form and development of greater Christchurch.</p> <p>Larger sections and family homes are to be provided for through the Land Use Recovery Plan as a diverse range of housing types is specifically included in the Minister's Direction as a matter to be addressed. Larger sections provide</p>	No need to use CER Act powers as a change is not required to the draft LURP	That no change to the Land Use Recovery Plan be made to specifically provide for larger sections, or the density provisions in the draft RPS Chapter 6

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							<p>for one component of the required diversity of housing types.</p> <p>The tension in providing for larger sections and homes is the potential negative impact on housing affordability. Although the Minister's direction also requires affordable housing to be addressed, this does not mean that all housing to be provided for needs to be 'affordable housing'.</p> <p>It is considered that the density provisions in the draft RPS Chapter 6 allow for larger sections to be provided, with a balance of smaller sections, and therefore the Land Use Recovery Plan sufficiently provides for this type of development.</p>		
16.	Restrictive Covenants Are restrictive covenants an issue to be addressed by the Land Use Recovery Plan?	Purposes: (a), (d), (f) and (g)	Goals: 1.1, 3.4, 5.3 and 5.6	Clauses: 2.2 B (iv)	The Land Use Recovery Plan may make changes to RMA, LGA and LTMA instruments. Overriding developer covenants (i.e. private contracts) is not able to be achieved through these instruments and would require new legislation.	No change. Removing the possibility for such covenants would require an Act of Parliament, which would require an entirely separate policy process.	<p>Restrictive covenants were raised by some written comments as limiting the ability to provide smaller sections and lower priced housing, which impacts on the ability to provide affordable housing.</p> <p>Restrictive covenants are included as an issue for central government to consider under section 7 of the draft Land Use Recovery Plan. This is not appropriate to include in a final Land Use Recovery Plan.</p> <p>The Land Use Recovery Plan cannot override existing private contracts. However, if covenants are hindering recovery central government may need to investigate this issue through a separate process.</p>	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft Land Use Recovery Plan to remove reference to reviewing restrictive covenants, as this is not an area that can be addressed by the Land Use Recovery Plan.	That the reference to reviewing restrictive covenants in the draft Land Use Recovery Plan be removed while consideration should be given to investigating the issue through a separate process.

Section 4: Business

#	Issue	Considerations			Appropriateness for Land Use Recovery Plan	Strategic Partner Advice	Discussion	Necessity for use of CER Act Powers to make changes to the draft LURP	Recommendation to the Minister for CER
		CER Act	Recovery Strategy	Minister's Direction					
17.	Reverse Sensitivity Are reverse sensitivity issues appropriately dealt with?	Purposes: (a), (f) and (g)	Goals: 1.1, 2.1, 2.3, 2.8 and 5.5	Clauses: 2.2A 2.2B	The Minister's direction specifically states that the location, type and mix of residential and business activities are to be identified within geographic areas necessary for earthquake recovery, including the land use policy and planning provisions to provide for these areas. Reverse sensitivity is an issue normally addressed at some level by land use policy and planning provisions.	No change	<p>Some commenters supported the need to recognise the impacts of reverse sensitivity and to provide protection of existing uses. Specific requests were made to identify and protect existing: transport corridors; military operations; and industrial activity in the Woolston / Bromley area.</p> <p>The extent and specificity of the land use policy and planning provisions will therefore need to reflect the nature and implications of the issue.</p> <p>Matters relating to reverse sensitivity resulting from new noise sensitive developments adjacent to the railway line are addressed in the development of conditions for intensification.</p> <p>The effects of land use on strategic infrastructure are to be managed under Policy 6.3.5(5) of the proposed RPS Chapter 6. The identification of Defence facilities as strategic infrastructure was supported in written comments by the NZ Defence Force.</p> <p>The reverse sensitivity issues in the Woolston / Bromley area are being addressed through a case management approach. This approach currently involves meeting with the affected industries to look at mecha-</p>	No need to use CER Act powers as a change is not required to the draft LURP	That no change to the Land Use Recovery Plan be made to address this issue.

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							nisms and measures that CCC and ECan can provide, including how monitoring and reporting of complaints are addressed, providing guidance on meeting consent requirements and discussing the development of provisions to be included in the CCC Plan Review process.		
18.	Retail in Industrial Should provisions for retail developments in industrial areas be strengthened or relaxed?	Purposes: (d), (f) and (g)	Goals: 2.1, 2.11 and 5.3	Clauses: 2.2A 2.2B 2.5	The Minister's direction specifically requires priority areas to support recovery and rebuilding including for business activities, and the land use policy and planning provisions to provide for these areas. Restrictions on land use activities within the greenfield priority areas are appropriate planning provisions to be included at a high level in the Land Use Recovery Plan or associated documents.	Advice includes: Allowing for unfettered retail and office activities in greenfield priority areas for business will undermine the more optimal outcome of the Land Use Recovery Plan in relation to rebuilding existing communities and enabling revitalisation of existing centres in a manner that minimises unnecessary transport movements and supports public and active transport. If office park style development is desirable then this should be made explicit with locations identified to a few existing locations rather than weakening the policy intent overall. Recommend extend definition to include trade and building supplies and yard based	The proposed provisions in Chapter 6 of the RPS [Policy 6.3.6] limit the amount of commercial activity (especially office and retail) that may occur within identified greenfield priority areas for business. The policy further requires that "new greenfield business land in Christchurch City is primarily for industrial purposes and restricts these areas for office and retail use". Written comments sought changes to allow a wider range of activities to occur in business greenfield priority areas eg. more retail, and to clarify the definitions used, in particular, for trade based retailing or office use. Restrictions on the land use able to take place in priority areas is consistent with the purposes (f) and (g) of the CER Act, and goals 2.1 and 5.3 of the Recovery Strategy through ensuring that adequate land is available for earthquake affected activities to relocate, including industrial land. Provisions allowing other activities to utilise this land may lead to a scarcity of land for the activities	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to Appendix 2 of the draft LURP Policy 6.3.6(5) to make it clearer and appropriately flexible. It is considered that the amendment would be consistent with section 3(d) and (f) of the CER Act, and goals 5.2, 5.3 and 5.5 of the Recovery Strategy.	Redraft RPS Chapter 6 Policy 6.3.6(5) to read: "Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and commercial use in these areas is restricted." This amendment reflects the overall policy intent of protecting capacity for industrial activity but is slightly more flexible wording.

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						retailing.	<p>which the priority areas were originally identified for.</p> <p>There is also a link to reverse sensitivity issues, where certain incompatible activities locating in areas identified predominately for other uses may result in a conflict over the effects of preexisting activities on the new activities.</p> <p>The Minister's direction also specifies that the provisions of the Land Use Recovery Plan must be consistent with the Christchurch Central Recovery Plan. Restrictions on commercial development in industrial areas will help ensure this consistency as commercial activities are better suited within the Christchurch CBD, Key Activity Centres and Neighbourhood Centres.</p> <p>However, there is the possibility that investment in commercial activities that could contribute to the recovery of greater Christchurch could be lost if the provisions are made too restrictive, and therefore potentially not be totally aligned with purposes (d) and (g) of the CER Act.</p>		
19.	Urban Design Should provisions for urban design be strengthened or relaxed?	Purposes: (f) and (g)	2.1, 2.4, 5.2 and 5.3	Clauses: 2.2B	The Minister's direction allows for business land use policy and planning provisions to be changed if this is necessary for earthquake recovery. Urban design requirements are able to be put in place through this	Amendments to RPS Chapter 6 Recommend retaining existing policies and criteria but make mention in the principal reasons and explanation that the decision makers should consider the costs and benefits of any	Some comments suggested that policy 6.3.2 <i>Development form and urban design</i> relating to urban design provides an overly complex set of requirements at an RPS level and amendments were suggested. One commenter suggested that urban design considerations should not be necessary for industrial zones. Changes to urban design land use	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to Appendix 2 of the draft LURP Policy 6.3.2 to incorporate	Amend RPS Chapter 6 Policy to provide for urban design principles in the development of new business areas to be applied only to the extent appropriate for the business area.

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					mechanism if considered to be necessary.	intervention over the life of the development.	<p>policy and planning provisions through the Land Use Recovery Plan are consistent with purposes (f) and (g) of the CER Act, and goals 2.1, 2.4 and 5.3 of the Recovery Strategy. Goal 5.2 of the Recovery Strategy recognizes the need for appropriate urban design provisions that facilitate earthquake recovery.</p> <p>Purpose (d) of the CER Act and goals 2.3 and 2.8 of the Recovery Strategy would not be supported by inappropriate or overly restrictive urban design provisions which reduce certainty or confidence, or lead to a disincentive for business development.</p> <p>The land use policy and planning provisions in the Land Use Recovery Plan and RPS Chapter 6 need to be appropriate to facilitate earthquake recovery.</p>	<p>economic considerations in the application of the provisions, in order to ensure that business recovery is not disproportionately adversely affected by the application of the provisions.</p> <p>It is considered that the amendment would be consistent with section 3(d), (f) and (g) of the CER Act, and goals 1.1, 2.3, 5.3 and 5.5 of the Recovery Strategy</p>	
20.	<p>Greenfield priority area Business zoning</p> <p>Should currently zoned rural land used predominately for residential purposes (Shown as SW corner of B10 and B11) and new Land at Lincoln be zoned for business greenfield priority area land?</p>	Purposes: (a), (b), (d), (f) and (g)	Goals: 1.1, 3.1 and 5.5	Clauses 2.2A 2.2B	Identification of priority areas for businesses is specifically identified in the Minister's direction for the Land Use Recovery Plan.	<p>Exclude SW corner of B10 and revert to extent of B10 and remove B11 boundary as previously shown in Land Use Recovery Plan and RPS Chapter 6 (Appendix 2 of Land Use Recovery Plan).</p> <p>The matter of land at Lincoln was raised as a late written comment, and verbal feedback was sought from SDC. SDC advice was that the land was not part of the original plan change nor was it identified as a</p>	<p>Identification of the area of land around Main South Road / Marshs Road as a greenfield priority area for Business and any subsequent changes to the Christchurch City Plan appears consistent with Clause 2.2 and 2.2B of the Minister's direction.</p> <p>Identification of the area is also considered to be consistent with goals 1.1 and 5.5 of the Recovery Strategy.</p> <p>However, the area has been extended from that identified in the preliminary draft Land Use Recovery Plan. The area has not been subject to a private plan change application and no prior</p>	<p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to Map A in Appendix 2 of the draft LURP to alter the area covered by the business priority area identified as the South West Corner of 'B10' and 'B11', in order to reflect the views of the community.</p>	<p>Remove the South West corner of B10 and revert to the extent of B10 boundary and the area shown as B11 as previously shown in the preliminary draft Land Use Recovery Plan and RPS Chapter 6 (Appendix 2 of Land Use Recovery Plan).</p> <p>Do not include the land at Lincoln as a new Greenfield Priority area for business.</p>

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						<p>greenfield priority area. SDC indicated support in principle for the area being zoned for business but as it is a new site it should go through a public consultation process.</p>	<p>public consultation has occurred for the whole of the identified area. These matters need to be considered alongside goal 3.1 of the Recovery Strategy or purpose (b) of the CER Act.</p> <p>Therefore, careful consideration should be given to the written comments regarding the identification of this area as a greenfield priority area for business. Written comments were received from property owners within the South West Corner of B10 and within B11 area and also those adjacent to it. Given advice from the strategic partners, it seems more appropriate to revert to the zoning in the preliminary draft Land Use Recovery Plan, as this would be more consistent with purpose (b) of the CER Act.</p> <p>The land at Lincoln is within an urban area and beside a supermarket development. This area has not, however been through a public consultation process as it was not a part of original plan change for the area. This area is best addressed through the RMA process via a private plan change.</p>	<p>It is considered that the amendment would be consistent with section 3(b) and (f) of the CER Act, and goals 1.1 and 5.5 of the Recovery Strategy</p>	

Section 5: Infrastructure

#	Issue	Considerations			Appropriateness for Land Use Recovery Plan	Strategic Partner Advice	Discussion	Necessity for use of CER Act Powers to make changes to the draft LURP	Recommendation to the Minister for CER
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21.	Transport	(f) and (g)	5.1, 5.2,	2.2 A (ii)	Clause 2.7 of the	Recommend	Written comments raised issues	It is considered	Make minor amendments

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	Does the Land Use Recovery Plan appropriately address transport issues?		5.3, 5.4	2.2 B 2.7	<p>Minister's direction restricts the Land Use Recovery Plan's ability to make changes to infrastructure provision, including public transport.</p> <p>However, Clause 2.2 specifically includes enabling and informing the sequencing and timescales for the delivery of infrastructure <i>and transport networks</i> and hubs to support the priority areas.</p> <p>The draft Land Use Recovery Plan includes section 4.1.3 Transform Public and Active Transport, and includes reference to the Greater Christchurch Transport Statement</p>	<p>amendments to include the specific reference to 'safety' as a key objective.</p> <p>If it is necessary to delete the specific reference to rail in Action 12, that would be acceptable. It would not be acceptable to specifically exclude rail from all consideration in the draft LURP.</p> <p>That 4.1.1.2 includes a broader definition of affordable to include concept of locational efficiency/ transport accessibility costs to future users.</p> <p>That 4.1.1.2 includes the importance of the location of affordable housing to encourage and enable active and public transport use.</p>	<p>around transport provision, these included:</p> <ul style="list-style-type: none"> - Transport planning needs to include cycling and walking provision, including safer walking and cycling routes - Provide flexible public transport services as communities develop so that provision is available to an appropriate scale at an appropriate time - Put strategies in place to cater for future transport growth to Key Activity Centres - Expectations should be managed about meeting service requirements for road provision and to promote alternatives such as walking, cycling and public transport during the rebuild - Provide for and encourage active transport choices - Concern about the viability of rail for public transport <p>Transport issues relate to the purposes of the CER Act through section 3(f) and (g), and specifically relates to goal 5.4 of the Recovery Strategy.</p> <p>Clause 2.2 A (ii) of the Minister's direction specifically refers to transport networks and hubs in terms of enabling and informing the sequencing and timescales for the delivery of infrastructure. Clause 2.7 restricts the Land Use Recovery Plan to informing decision making in</p>	<p>necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to specifically include safety as an objective for transport matters, and link transport costs with affordable housing, in order to achieve better outcomes for the integration of land use and transportation planning.</p> <p>It is considered that the amendment would be consistent with section 3(g) of the CER Act, and goal 5.4 and 5.6 of the Recovery Strategy.</p>	to the Land Use Recovery Plan wording to strengthen the importance of safety as an objective and link affordable housing with transport costs and public transport provision.

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							<p>relation to infrastructure provision including public transport.</p> <p>The draft Land Use Recovery Plan includes section 4.1.3 Transform Public and Active Transport and Objectives and policies in the proposed RPS Chapter 6 that relate to transport, including active and public transport.</p> <p>Therefore it is considered that the draft Land Use Recovery Plan adequately addresses active and public transport in a way that is consistent with the Minister's direction and most of the concerns raised in the written comments.</p> <p>Some small amendments to the wording of the Land Use Recovery Plan documents could be made to strengthen the importance of safety as an objective and link affordable housing with transport costs and public transport provision.</p>		
22.	<p>Lyttelton Harbour</p> <p>Should the Land Use Recovery Plan address issues for public access links to the Lyttelton Wharf?</p>	Purposes: (g)	Goals: 4.3, 5.1, 5.2 and 6.4	Clauses: 2.7	The Minister's direction specifically identifies recreational facilities and spaces and public transport as matters to which the Land Use Recovery Plan may not direct or implement changes.	No change	<p>A particular written comment focused on the need to address issues around Lyttelton Harbour, including rail links to the cruise ship berth, public open space, and rail as a public transport link.</p> <p>Addressing these issues may be considered to be consistent with purpose (g) of the CER Act and goals 4.3, 5.1, 5.2 and 6.4 of the Recovery Strategy.</p> <p>However, clause 2.7 of the Minister's direction specifically excludes changes being made</p>	No need to use CER Act powers as a change is not required to the draft LURP	No changes should be made to the Land Use Recovery Plan to address issues raised in relation to Lyttelton Harbour.

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							<p>through the Land Use Recovery Plan to address these issues as they relate to infrastructure provision and recreational facilities.</p> <p>Therefore these comments should not be addressed in the Land Use Recovery Plan</p>		
23.	<p>Airport Noise Contour</p> <p>Is the Airport Noise Contour and associated planning provisions an appropriate measure in the Land Use Recovery Plan?</p>	(a), (d), (f) and (g)	1.1, 5.3 and 5.5	2.2 A (i) 2.2 B 2.7	<p>The Minister's direction requires priority areas for residential and business activities to be identified in the Land Use Recovery Plan under clause 2.2 A (i).</p> <p>Changes to land use policy and planning provisions to provide for priority areas can be made under clause 2.2 B.</p> <p>The draft Land Use Recovery Plan includes the Airport Noise Contour as part of the planning provisions to support identification of priority areas.</p>	<p>Recommend no change. One comment noted that enabling development on their site would resolve the noise boundary issue from their particular point of view as a land owner. However, this would result in a long term precedent issue for new zoning within the noise contours.</p> <p>Removing the noise contours altogether would not provide for the integration of infrastructure with land use; and other better opportunities exist for development in areas not subject to noise sensitivity constraints.</p> <p>It was recommended that no change be made to noise sensitive activities definition despite request from some educational institutions for this.</p>	<p>The draft Land Use Recovery Plan includes the 50 dBA Ldn Airport Noise Contour on Map A and gives effect to this through provisions restricting noise sensitive activities within the contour boundary, including residential activities.</p> <p>Written comments were received on the inclusion of the Airport Noise Contour. Some supported its inclusion, other comments specifically requested that it be removed from the Land Use Recovery Plan, or use a 55 dBA Ldn contour instead and/or use different definitions of 'noise sensitive activities', and/or use exemptions for specific areas of urban development within the Airport Noise Contour. The alignment of the definition of 'noise sensitive activities' across the RPS and district plans was also requested, as well as expanding this definition to recognise activities permitted within the contour through previous decisions that may otherwise be considered as a noise sensitive activity.</p> <p>Inclusion of the Airport Noise Contour for Christchurch International Airport</p>	<p>It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to ensure that the definition of 'noise sensitive activities' in the relevant district plans is aligned with that in the RPS Chapter 6, and that activities permitted within the contour through previous decisions are not inadvertently included as noise sensitive activities that should be restricted.</p> <p>It is considered that the amendment would be consistent with section 3(d) and (f) of the CER Act, and goal 1.1 of the</p>	<p>1. Do not remove the Airport Noise Contour included in the draft Land Use Recovery Plan.</p> <p>2. Retain the 50dBA Ldn Airport Noise Contour as included in the draft Land Use Recovery Plan.</p> <p>3. Retain the current Noise sensitive activities definition, with the inclusion of a clause to exclude particular activities permitted through previous decisions, and align this definition across the relevant district plans through plan changes included in the LURP appendices.</p> <p>4. Do not allow for exemptions for development of noise sensitive activities within the Airport Noise Contour other than that already provided for in the draft Land Use Recovery Plan.</p>

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							<p>1. Necessary for Earthquake Recovery</p> <p>To be considered as necessary for earthquake recovery, the inclusion of the Airport Noise Contour for Christchurch International Airport should be consistent with the purposes of the CER Act and the goals of the Recovery Strategy for Greater Christchurch.</p> <p>Consistency with the Purposes of the CER Act</p> <p>The inclusion of the Airport Noise Contour as part of the planning provisions included in the Land Use Recovery Plan to support the identification of priority areas is consistent with the purposes of the CER Act contained in sections 3(a), (d), (f) and (g).</p> <p><i>(a) to provide appropriate measures to ensure that greater Christchurch and the councils and their communities respond to, and recover from, the impacts of the Canterbury earthquakes:</i></p> <p>Inclusion of the Airport Noise Contour is consistent with the purpose set out in section 3(a) of the CER Act as this will help to ensure response to and recovery from the impacts of the Canterbury earthquakes, including the councils of greater Christchurch, as it helps to provide for the appropriate zoning of land for recovery purposes, and can therefore be considered to be an appropriate measure.</p> <p><i>(d) to enable a focused, timely and</i></p>	Recovery Strategy	

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							<p><i>expedited recovery:</i></p> <p>Inclusion of the Airport Noise Contour is consistent with the purpose set out in section 3(d) of the CER Act as this provides for focused and timely identification of areas of land appropriate for new residential and business urban development during the recovery of greater Christchurch from the impacts of the Canterbury earthquakes.</p> <p><i>(f) to facilitate, co-ordinate, and direct the planning, rebuilding, and recovery of affected communities, including the repair and rebuilding of land, infrastructure, and other property:</i></p> <p>Inclusion of the Airport Noise Contours is consistent with the purpose set out in section 3(f) of the CER Act as it forms part of and is a necessary inclusion in the planning required for the identification of appropriate land for recovery purposes, including for residential land for the resettlement of displaced communities.</p> <p><i>(g) to restore the social, economic, cultural, and environmental well-being of greater Christchurch communities:</i></p> <p>Inclusion of the Airport Noise Contours is consistent with the purpose set out in section 3(g) of the CER Act. In the decision of CRC v Independent Fisheries Ltd [CA438/2012], it is stated at paragraph 100 that;</p> <p><i>"there is little doubt that the</i></p>		

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							<p><i>continued safe and efficient operation and further development of Christchurch International Airport is essential for the full social, economic, cultural and environmental recovery of greater Christchurch in the widest sense"</i></p> <p>In particular, the continued 24-hour operation of Christchurch International Airport significantly contributes to the economic well-being of greater Christchurch. This is identified in Robinsons Bay Trust v CCC [2004] at paragraph 60 where the decision states that;</p> <p><i>"the continued viability of the airport enables the wider community to provide for their social and economic wellbeing in particular"</i></p> <p>Consistency with the Recovery Strategy for Greater Christchurch</p> <p><i>1.1 facilitating a timely and efficient recovery, including intervening where necessary to remove impediments, resolve issues and provide certainty</i></p> <p>Goal 1.1 of the Recovery Strategy is supported by the inclusion of the Airport Noise Contour by providing certainty in relation to where new development, particularly residential development, may and may not occur, without adversely affecting the economic viability of Christchurch International Airport. It also provides certainty for Christchurch International Airport in</p>		

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							<p>relation to the continued ability to operate without restrictions on the time of day when operations may occur..</p> <p><i>5.3 rebuilding infrastructure and buildings in a resilient, cost-effective and energy-efficient manner</i></p> <p>Goal 5.3 may also be supported by the inclusion of the Airport Noise Contour by providing planning provisions that avoid urban development related to earthquake recovery within an area that could result in costs to the Airport in the long term due to reverse sensitivity issues. This in turn helps to avoid costs to the greater Christchurch economy that could occur of the operation of the Airport were to be curtailed by reverse sensitivity issues in the future.</p> <p><i>5.5 zoning sufficient land for recovery needs within settlement patterns consistent with an urban form that provides for the future development of greater Christchurch</i></p> <p>Inclusion of the Airport Noise Contour is consistent with Goal 5.5 as adequate land is able to be zoned for recovery purposes without including land within the Airport Noise Contour.</p> <p>Consideration of the Minister's Direction</p> <p>Conceptually, an Airport Noise Contour can be included in the Land Use Recovery Plan, and subsequent changes made to regional and district planning</p>		

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							<p>documents to include the Airport Noise Contour and restrictions on urban development within the contour, through clause 2.2 A (i) and 2.2 B of the Minister's direction as a change to land use policy and planning provisions to support identification of residential and business priority areas.</p> <p>Clause 2.7 of the Minister's Direction states that the Land Use Recovery Plan 'will inform decision-making in relation to infrastructure provision and associated community services', but 'may not direct or implement changes to these matters'. These matters include 'public transport, health services, educational facilities and recreational facilities and spaces'.</p> <p>The Airport Noise Contours are a means to ensure integration of land use and infrastructure, and not infrastructure provision as set out in Clause 2.7 of the Minister's direction.</p> <p>Overall</p> <p>The inclusion of the Airport Noise Contour represents an appropriate land use policy and planning provision to be included in the Land Use Recovery Plan as it is consistent with the purposes of the CER Act and the Recovery Strategy for Greater Christchurch.</p> <p>It is considered necessary to include the airport noise contour in the LURP.</p>		

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							<p>2. Airport Noise Contour – 50 or 55 dBA Ldn</p> <p>The Airport Noise Contour to be applied to the Christchurch International Airport has been the subject of significant analysis through planning processes under the Resource Management Act, including through Environment Court proceedings.</p> <p>Robinsons Bay Trust v Christchurch City Council [2004] CA060 in particular addressed this issue, concluding at paragraph 64 that;</p> <p><i>“the 50 dBA Ldn noise contour better reflects the purpose of the [Resource Management] Act to achieve the sustainable management of these physical resources”</i></p> <p>This decision considered the Airport Noise Contour lines prior to remodelling of the 50 dBA Ldn contour in 2007. This remodeled contour line was agreed to by a panel of experts.</p> <p>The Waimakariri District Plan and Selwyn District Plan already both contain the 50 dBA Ldn contour line in the respective planning maps and provisions to restrict noise sensitive activities from locating within this area.</p> <p>It is therefore considered reasonable to adopt the re-modelled 50 dBA Ldn Airport Noise Contour as included in the draft Land Use Recovery Plan without changes as this has been tested through the</p>		

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							<p>Environment Court and is consistent with the Waimakariri and Selwyn District Plans</p> <p>3. Noise Sensitive Activities</p> <p>Appendix 2 to the draft Land Use Recovery Plan contains the proposed Chapter 6 to the Canterbury Regional Policy Statement. This includes Policy 6.3.5 – Integration of land use and infrastructure. Policy 6.3.5 (4) includes avoiding 'noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport.</p> <p>'Noise sensitive activities' are defined in the proposed Chapter 6. Some written comments wanted changes to the definition to allow for certain activities such as schools within the Airport Noise Contour.</p> <p>The definitions of 'noise sensitive activities' contained in the Selwyn, Waimakariri and Christchurch City District Plans are all relatively consistent with that proposed in the RPS Chapter 6, and specifically all include educational facilities.</p> <p>It is therefore considered that the definition of Noise Sensitive activities is appropriate in its current form in the draft Land Use Recovery Plan, and specifically should not be amended to exclude educational facilities from the definition.</p> <p>However, an addition should be made to the definition to exclude those activities permitted through</p>		

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							<p>previous RMA decisions to avoid restrictions inadvertently being placed on these activities.</p> <p>It is also considered appropriate to include plan changes within the LURP to align the definition of noise sensitive activities across the RPS and district plans, as this would ensure consistency across the plans.</p> <p>4. Exceptions</p> <p>Exceptions to the restriction of noise sensitive activities locating within the 50 dBA Ldn Airport Noise Contour may undermine the implementation of the contours and associated land use policies. Exemptions may lead to a precedent effect, where other land owners may request, and gain, additional exceptions, thereby undermining the very purpose and intent of the noise corridor.</p> <p>There are existing areas of urban development and undeveloped but zoned areas for future urban development within the 50 dBA Ldn noise contour. This is unavoidable as these areas were developed or zoned prior to the implementation of the Airport Noise Contour.</p> <p>The draft Land Use Recovery Plan amendments to the RPS include exemptions for Kaiapoi (Policy 6.3.5 (4)) to allow for the development of residential areas within the Airport Noise Contour to replace those areas identified as residential red zones in Kaiapoi that were within</p>		

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							the identified Airport Noise Contour. These exceptions can be distinguished from other requested exceptions and are considered as not setting a precedent effect, as they replace pre-existing urban land that was within the noise contour and therefore do not add significantly to the total amount of urban activities located within the contour.		

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Section 6: Hazards

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24.	Natural Environment Recovery Programme Should the Land Use Recovery Plan provide more statutory power to the NERP?	Purposes: (a), (d) and (g)	Natural Environment Recovery component of the Recovery Strategy	Clauses: 2.8	The Minister's direction specifically identifies non-land use resources as matters which may not be specifically addressed in the Land Use Recovery Plan.	Not within the scope of Land Use Recovery Plan, other than to reflect relevant issues raised through the Natural Environment Recovery Programme Majority of Natural Environment Recovery Programme projects are already approved through annual plans and 3 yearly planning processes. Links in Natural Environment Recovery Programme to ensure quality and water can be addressed through CJC District Plan review and wider RMA processes such as	Some written comments requested that the Natural Environment Recovery Programme be given more statutory power through, or be integrated entirely with, the Land Use Recovery Plan. The Minister's direction is clear, through Clause 2.8, that the matters covered by the Natural Environment Recovery Programme are not matters to be addressed by the Land Use Recovery Plan.	No need to use CER Act powers as a change is not required to the draft LURP	No change should be made to the Land Use Recovery Plan to provide more statutory power to the Natural Environment Recovery Programme.

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						preparing ODPs and other consenting.			
25.	TC3 Land Should more restrictions be placed on development or redevelopment of TC3 land?	Purposes: (a), (f) and (g)	Goals: 1.7, 5.2, 5.3, 5.7	Clauses: 2.2 D	Priority areas can be identified in the Land Use Recovery Plan with consideration given to natural hazards.	No change. Several of Christchurch's greenfield priority areas do include TC3 land. New plan change provisions, MBIE guidelines and recent changes to building and subdivision consent processes directly address geotechnical hazards. TC3 land can be developed with appropriate ground strengthening and building foundation design.	Written comments were received which noted that land subject to underlying natural hazard concerns should not be developed. Some comments specifically stated that TC3 land was not suitable for development. The Minister's direction includes the ability to consider avoiding or mitigating the changed or heightened risks of natural hazards when identifying priority areas. The development or redevelopment of TC3 land will require compliance with the Building Act and MBIE foundation requirements. Further to this, land within new greenfield areas is normally subject to geotechnical requirements, including geotechnical work being carried out prior to building construction. TC3 covers reasonably large areas of non-contiguous land spread throughout much of Christchurch city. Excluding this land from future development may have a significant negative effect on recovery and the economic and social well-being of residents. Therefore, no constraint should be placed on TC3 land for development through the Land Use Recovery Plan.	No need to use CER Act powers as a change is not required to the draft LURP	No change should be made to the Land Use Recovery Plan not to restrict development of TC3 land.

Section 7: Implementation

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26.	District Plan Review Should the Christchurch City District Plan Review follow the process set out in the First Schedule of the RMA or some other more streamlined process?	Purposes: (a), (b), (d), (f) and (g)	Goals: 1.1, 1.5, 3.1 and the Built Environment Recovery Component	Clauses: 2.4	Clause 2.4 of the Minister's direction allows the Land Use Recovery Plan to identify programmes of work to be undertaken.	Section 7 of the draft Land Use Recovery Plan expresses the opinion that a holistic approach is required to the Christchurch City District Plan review and to avoid a 3 year long process Government should consider alternative mechanisms to deliver a faster and more efficient review.	The draft Land Use Recovery Plan proposes to complete new district plan provisions identified as directly related to recovery by 30 June 2014. Written comments have expressed concern that the draft Land Use Recovery Plan has the potential to limit public rights of submission hearing and appeal and should, at least, involve independent commissioners.	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to reflect decisions being made under other processes regarding the Christchurch City District Plan review to ensure that there is consistency with these decisions.	As this matter is being addressed through a separate decision making process no detailed recommendation is made for inclusion in the Land Use Recovery Plan. However it is recommended that relevant actions be amended to reflect the timetable made in the separate decision.
27.	Post Land Use Recovery Plan growth areas identification Should the maps included in the Land Use Recovery Plan identify land for growth after the Land Use Recovery timeframe?	Purposes: (d) and (f)	Goals: 1.1, 5.5	Clauses: 2.2 A (i) 2.8	The Minister's direction specifically states that priority areas are to be identified to support recovery and rebuilding in the next 10 to 15 years. Clause 2.8 states that long term provisions for growth and development in greater Christchurch may be considered by, but not specifically addressed in the Recovery Plan.	No specific advice provided	Some written comments received requested that their land be identified as priority areas in Map A instead of 'Greenfield areas – Post Land Use Recovery Plan. This raises the issue of whether this 'Post Land Use Recovery Plan' land should be identified in the Land Use Recovery Plan. The CER Act purposes set out in section 3(d) and (f) are relevant. 3(d) specifically states that the Act is to enable a focused, timely and expedited recovery. Identifying land for urban growth after 2028 would not be consistent with this purpose. Including the post-Land Use	It is considered necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to remove the 'post LURP' land identified in Map A of Appendix 2 in order to ensure the LURP complies with clause 2.8 of the Minister's direction.	The Post-Land Use Recovery Plan land identified on Map A should be removed following careful consideration of any comments that identified land included in these areas as needing to be included in the Priority Areas. District Councils will have the opportunity to consider these areas in future district plan reviews.

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							<p>Recovery Plan land may be consistent with goal 5.5 of the Recovery Strategy as it would provide for the future development of greater Christchurch.</p> <p>The Minister's direction only notes that priority areas are to be identified to support recovery and rebuilding in the next 10 to 15 years. The post- Land Use Recovery Plan land identified in this map is in conflict with Clause 2.8 which states that long term provisions for growth and development in greater Christchurch may be considered by, but not specifically addressed in the Recovery Plan</p> <p>The Post-Land Use Recovery Plan areas on Map A should therefore be removed prior to a Land Use Recovery Plan being made operative.</p> <p>However, careful consideration should be given to those comments that noted land as being within the post-Land Use Recovery Plan areas and should be included in the Land Use Recovery Plan Priority Areas.</p> <p>If these areas are not considered to be required to support earthquake recovery and rebuilding in the next 10 – 15 years and therefore unnecessary to be included in the priority areas, the District Councils should consider these areas in any future district plan reviews</p>	It is considered that the amendment would be consistent with section 3(d) and (f) of the CER Act, and goal 5.5 of the Recovery Strategy	
28.	New Density Rules	Purposes:	Goals:	Clauses:	The proposed RPS	Amend Policy 6.3.7	Purposes (a), (d) and (f) of the CER	It is considered	Make changes necessary

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	Will the density provisions included in the draft Land Use Recovery Plan be applied appropriately to developments already in the planning stages?	(a), (d) and (f)	5.3, 5.5 and 5.6	2.2 A 2.2 B (iv)	Chapter 6 (as part of the draft Land Use Recovery Plan) includes net density policies.	(residential yield) to exclude residential areas subject to an ODP and specific density provisions prior to the revised RPS becoming operative.	<p>Act are supported by the proposed RPS Chapter 6 policy relation to residential densities.</p> <p>This also helps to achieve goals 5.3, 5.5 and 5.6 of the Recovery Strategy through a more compact and efficient urban form that allows for future development, as well as potentially helping to provide more affordable housing.</p> <p>The net density policies in the proposed Chapter 6 of the RPS help to achieve clause 2.2 A and 2.2 B (iv) of the Minister's direction through ensuring that smaller, more affordable lots are created through greenfield subdivision.</p> <p>However, if the policy were to adversely affect the efficiency of the development of land that has already been zoned prior to the implementation of a Land Use Recovery Plan by requiring additional time and cost to be expended on the development process, this may negatively impact on the achievement of purpose (d) of the CER Act.</p> <p>Therefore, the net density policies in the draft Land Use Recovery Plan should be constructed and applied in a way that avoids negative impacts on the efficiency of existing development projects.</p>	necessary for the Minister to use powers provided under section 21(1)(a) of the CER Act to make amendments to the draft LURP to Policy 6.3.7 in Appendix 2 so that the implementation of the policies do not adversely affect currently planned developments.	to ensure that the implementation of the net density policies do not adversely affect currently planned developments.