

5 February 2016

Land Use Recovery Plan Amendment  
Canterbury Earthquake Recovery Authority  
Private Bag 4999  
Christchurch 8140

Via email: [info@cera.govt.nz](mailto:info@cera.govt.nz)

Dear Sir

Comments by the Christchurch City Council in response to the public notice for the Avonhead Greenfields Priority Area (Business)

As outlined in the public notice notified in The Press on Saturday 16 January 2016, the Minister for Canterbury Earthquake Recovery proposes to remove the Greenfield Priority Area (Business) notation from Map A of the Land Use Recovery Plan (LURP) and from Map A of Chapter 6 of the Canterbury Regional Policy Statement (CRPS) for land at Avonhead.

The Council comments are as follows:

1. The Council's supports the removal of the Greenfields Priority Area (Business) notation from Map A of the LURP and the CRPS for the subject land at Avonhead as outlined in the public notice.
2. However, it is unclear from the public notice whether the subject area affected would no longer be within the Projected Infrastructure Boundary, or whether it would be considered as being within the Existing Urban Area on Map A.

The reasons we are supporting the removal of the Greenfield Priority Area (Business) notation are:

1. Zoning the land would not give effect to those parts of the CRPS that seek to ensure development occurs where there is sufficient infrastructure capacity, and integration of land use and infrastructure. There is currently insufficient capacity in the Riccarton wastewater interceptor catchment and necessary upgrades have not been included in the Council's 2015 – 2025 Long Term Plan.
2. Access to the subject land from Russley Road (SH1) remains unresolved with NZTA, on the basis of potential effects on the function of the State Highway. The Council considers that complete reliance on access from the local road network would compromise the function of those roads and have adverse effects on the amenity of surrounding residents and the memorial to earthquake victims in the neighbouring Avonhead cemetery. There also appears to be an absence of a secondary overland floor path for stormwater from some of the parcels.

3. Inclusion of the land for industrial purposes is no longer considered by the Council as being necessary for earthquake recovery purposes. There is sufficient land available in more appropriate locations to meet the City's anticipated needs until at least 2028.
  
4. Given that there appears to be no other urban options that would be consistent with the LURP or give effect to the CRPS, the Council's view is that the land would be excluded, and the Projected Infrastructure Boundary amended accordingly.

The Council wishes to thank the Minister for Canterbury Earthquake Recovery for the opportunity to comment on this proposal.

Yours sincerely



Cr Ali Jones

CHAIR, Submissions Panel

Christchurch City Council

Brendan Anstiss

General Manager, Strategy & Transformation

Christchurch City Council