

Submission on Proposed Change No.1 to the Regional Policy Statement



Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

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Christchurch Date: Aug 2007

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PO Box 1851

Signature: [Handwritten Signature]

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

Please note:

- (1) all submissions must be in a hardcopy form that is signed.
- (2) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

C

(1) The specific provisions of the variation that my submission relates to are: (Specify page number and subsection numbering for each separate provision).

See separate pages

(2) My submission is that: (State concisely: the nature of your submission, and clearly indicate whether you support or oppose each separate provision being submitted on, or wish to have amendments made, giving reasons.)

(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)

Tick this box if you do not wish to be heard in support of your submission;

Tick this box if you do wish to be heard in support of your submission; and,

Tick this box if you would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing.

Return your signed submission by 5pm, 31 October 2007

Freepost 1201

Change No.1, RPS

Environment Canterbury

P O Box 345

Christchurch

FILE REF: 045/07/88

DOCUMENT No.: 25 OCT 2007

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Submission to Regional Policy Statement

Proposed Change No. 1

Lloyd Bathurst

Rolleston Square Limited P O Box 25,021 CHCH

Introduction

In general Proposed Change No. 1 is supported, but amendments are suggested to more accurately reflect the aims, (particularly with effect in Selwyn District), changes in behavioural patterns, or because the documentation of the proposed change is not self evident.

1. Provision 12 A.2 Issue 1: Growth Trends Explanation

Explanation sentence 1

“An increasing share of the new dwelling construction in Christchurch City and Selwyn and Waimakariri Districts that are within the Greater Christchurch sub-region is occurring in low density “greenfields” development.”

Oppose unless evidence included or amendment provided.

The history of growth in Christchurch has been increasingly smaller areas of land for dwellings.

Since European settlement, new dwelling construction was initially all in greenfields development, but farms have become smaller, city and town section sizes have become smaller, and now multi storey living is becoming popular. Now more than ever, brownfields sites are used, and density is increasing.

2. Ditto Explanation b)

Oppose

Availability and cost of fossil fuel is irrelevant when alternative means of propulsion are available and becoming more capable of propulsion of private motor vehicles, particularly over the distances required within Greater Christchurch.

3. Ditto Explanation c)

Oppose

International commitments can be altered on political whim and the global effect of reducing carbon emissions in Greater Christchurch is infinitesimal unless it can be demonstrated that reducing carbon emissions would lead to a change in such behaviour by the world’s more populous nations.

4. Ditto Explanation d)

Oppose unless amended.

This clause needs clarifying by splitting the private and public transport systems. Public transport use of diesel fuels needs resolution of the carcinogenic pollution, and evidence is required that more cost effective public transport can be provided which accounts for the value of commuters extra time when using public transport.

5. Ditto Explanation

Amend by adding clause referring to protection of variable soils for production.

6. Issue 2: Accommodating Growth

Support

7. Issue 3: Environmental Challenges

Support

8. Issue 4: Growth Impacts

Support with amendment to include “i) loss of existing character”

Explanation to be amended to “... optimum relationships between residential, employment, **shopping**, and recreational activities” (Studies show the average number of trips to shop per week has multiplied several times in recent years. Hence, energy use and effect on demand for roading infrastructure is dramatically affected.)

9. Issue 5: Transport Effectiveness

Support with amendment to include **rail network** in c)

10. Issue 6: Amenities

Support

11. Issue 7: Rural Residential Impacts

Support

12. 12 A.3 Objective 1: Urban Consolidation

Support with amendment to explain how infrastructure limits intensification.

Explanation paragraph 3 needs evidence to the statement that “Limitations to infrastructure within Christchurch City until 2016 means that greenfields development around surrounding towns will continue to be required”

Given that intensification provides

A) Less stormwater capacity required (more multi storey, therefore less roof area, and more brownfields) and stormwater capacity from central Christchurch is not limited.

B) Equal amount of sewer capacity required, and sewer infrastructure does not take 10 years to upgrade.

C) Equal amount of water capacity required.

D) Less roading infrastructure required.

It is therefore hard to imagine how the statement could be correct, so an amendment is required to explain. On the face of it, political will appears to be the limiting factor.

13. Objective 2: Character and Sustainability

Support with amendments that includes reference to the Existing Character and Identity of Townships, and that the 60:40 ratio is not just something that will be achieved in 2041.

The explanation refers to "... redevelopment within Christchurch City, and the development of areas presently zoned rural..." but no reference is made to the individual character and identities of the townships which are of high importance to the residents.

Further, it should be made clear that the preservation of **existing character and identity** is important rather than "... achieve built environments... that have a sense of character and identity" which could accept destroying existing character and creating a new character.

This does not imply that the character should not evolve, merely that the existing character should not be destroyed by excessively fast, large, or insensitive development.

The need to progress to the 60:40 ratio is urgent, and given the existing political intransigence, it is necessary to set **interim targets** so that the final target is not missed.

14. Objective 3: Recognising Urban Growth Limitations

Support

15. Objective 4: Integration of Land Use, Infrastructure and Roading

Support

16. Objective 5 : Key Activity Centres

Support

17. Objective 6: Business Land

Support

18. Objective 7: Integration of Transport Infrastructure and Land Use

Support

19. Objective 8: Protection of Strategic Infrastructure

Support

20. 12A.4 Policies Policy1: Urban Limits

Support with amendment required to preclude delay caused by the resolution of locations for specific growth provisions for Kaiapoi, Woodend, and Rolleston.

The proposal to hear a variation to Proposed Change No. 1 after the resolution of specific locations is likely to produce delays to the process of adopting Proposed Change No. 1, which is unnecessary and unacceptable, therefore an alternative process should be provided for.

21. Policy 2: Intensification

Support with **interim targets** as in 14 above.

22. Policy 3: Business Land

Support with amendments

There is a tension between “Promotes the redevelopment and better utilization of existing business land”, and “provides sufficient other land for expansion”

There is a lack of recognition within this document that there is a distinct difference in the most sustainable manner to provide for different types of business activities. This is because of the different ratio of cost of land to total operating expense, and the effect on sustainability and profitability of the supply of land.

If Business Activities are broadly divided into Industrial, Office, and Retail, then the provision of land should be made in the following manner.

Industrial activities are sensitive to land prices, and generally work on the basis of more land equals lower prices equals more industry, more employment, closer to the workforce, more sustainable.

Office space is less sensitive to land prices, and therefore needs to be constrained but close to the workforce and other services.

Retail space is largely insensitive to land cost because rental is a very small proportion of total operating expense, but constraintment of retail area is important because retail works best when there is an intensity of people and shops. What is happening in Greater Christchurch at present is that more greenfield sites are provided on lower cost land, existing retail sites “die”, and people are forced to travel further to shop, which is less sustainable in terms of energy use and roading infrastructure cost.

This duplication is exacerbated by people shopping much more frequently than in previous times. (People now visit the supermarket several times a week when in the past they visited once per week)

Evidence of this is in the “death” of local shops and the effect on existing retailers.

Double the numbers of shops equals half the catchment and spend per shop, equals a huge effect on profitability, and is not sustainable. It is more sustainable and environmentally acceptable to force redevelopment of existing retail areas, this is encouraged by high land values and high land value rating.

23. Policy 4: Existing Towns

Support with amendment that retains existing character

24. Policy 5 Key Activity Centres and Commercial Activities

Support

25. Policy 6: Urban Form, Infrastructure and Sequencing Within Identified Urban Limits

Support with amendments

A) Unless it can be shown that there is a limit of infrastructure to provide for certain areas of growth or other valid reason that the growth should be sequenced in the order dictated, then the stated sequencing should not occur. There are reasons of demand, affordability, and personal choice of developers as to timing, therefore to dictate sequencing is likely to lessen competition, increase prices and lessen choice.

B) Lincoln has particular problems with maintaining existing character, building on variable soils, and infrastructure of roading and sewer that indicate that the indicated growth rate is unsustainable. The people of Lincoln should be respected in their view of a sustainable growth rate without loss of character.

There are two further problems with Lincoln, the reverse sensitivity of trucks travelling through the road in the centre of town (there appears to be no cost effective alternative) and that Lincoln is too far from State Highway One and the rail route to provide for cost effective public transport.

26. Policy 7: Development Form and design

Support

27. Policy 8: Outline Development Plans and Changes of Zoning in District Plans

Support

28. Policy 9: Transport Effectiveness

Support with amendment.

Remove the word “consider changes”, add “make changes”

29. Policy 10: Strategic Transport Infrastructure and Reverse Sensitivity

Support with amendment.
Remove the word “**consider** changes”, add “**make** changes”

30. Policy 11 Residential Density

Support

32. Policy 12 Resolution of Urban Limits

Support

31. Policy 13: Rural Residential development

Support

32. Policy 14: Greenfield Development

Support

33. Policy 15: Circumstances for Altering growth and Sequencing

Support with amendment.

Each area (City or District) should be subject to the provisions of (a) and (b), so that each area is sensitive to the demand within it's area and provide for that demand.

34. 12A.5, .6, .7, .8

Support

Conclusion:

This submission attempts to provide for a more immediate, sustainable, accurate and flexible growth for Greater Christchurch with greater sensitivity to existing character.

We therefore seek the above decisions from the Council.