# Submission on Greater Christchurch Settlement Pattern Update For Cashmere Park Trust

12 February, 2019

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#### **Contents**

#### **INDEX**

1.	BACKGROUND & SITE	4
2.	REASON WHY SITE SHOULD BE INCLUDED AS A GREENFIELD PRIORITY AREA	4
3.	TIMING	8
4.	RELIEF SOUGHT	9
APF	PENDICES	
A.	MAP SHOWING LOCATION, URBAN, AND RURAL LAND AT THE TRUST'S LOCATION	13
В.	MAP SHOWING THE POSSIBLE DEVELOPMENT OF THE THREE 4 HECTARE BLOCKS	14

#### 1. BACKGROUND & SITE

I am a Trustee for a Trust that owns land at 36 Leistrella Road, 126 Sparks Road, and 17 Northaw Street. These three 4 hectare properties are within an area called the Henderson Basin which also shows in the Draft for Our Space 2018-2048-Greater Christchurch Settlement Pattern Update as a Projected Infrastructure Boundary on Figure 16. The above 3 lots are shown on the plan in Appendix B which also shows the eastern portion of land that we consider should be included in the NNZ of the City Plan.

The east and north edges of the Trust's land is at the 1 in 50 year flood level and the land slopes from there into the basin on a very slight slope, i.e. the land slope is 1 in 300. The eastern approx. 100m of the Trust's land has never flooded and is wasted as a retention pond and as 4 hectare lifestyle blocks. The storage volume for a 50 year storm in this area is only 900 cubic metres compared to millions in the basin, i.e. the average depth is only 25cm over an area of 3.6 hectares. This approximate 100m strip of eastern land would be far better converted to residential land by filling with material excavated from the western portions of the Trust's land using compensatory storage techniques. This technique is used in all new subdivisions now to create detention ponds to compensate for the extra runoff from the new urban land. By the Trust restricting the development to the eastern approximate 100m of the Trust's land the Trust is able to increase the amount of storage in the Henderson Basin, thereby reducing flooding in the Basin, Cashmere Stream, and Heathcote River. In addition, by building up the Trust's land to above the 200 year flood level, the Trust's land will act as a bund to protect the existing urban areas to the east of the Trust's land. Please see the attached plan marked Appendix A for the location and the more detailed plan marked Appendix B.

#### 2. REASON WHY SITE SHOULD BE INCLUDED AS A GREENFIELD PRIORITY AREA

The reasons why the area shown to be developed in the attached plan should be included in the Urban Area of Christchurch are as follows:

- 2.1 The area sought to be included in the urban limits meets all the objectives of Chapter 6 of the Canterbury Regional Policy Statement, and in fact meets most of the issues, objectives and policies better than most of the other Greenfield sites already shown on Plan A.
- 2.2 The Trust's land is only 6km to Cathedral Square in a straight line, whereas Rolleston is 22km, Kaiapoi is 16km, and Rangiora is 25km from Cathedral Square. The land is closer to the City Centre than any other Greenfield site.

- 2.3 The unique advantages of this area for urban development are:
  - i) It provides areas of stormwater cleansing by wetlands and swales for not just this area, but for all areas upstream. It is for this reason that the Christchurch City Council encouraged the Trust's owners to initiate a zone change to the City Plan before the Canterbury Earthquakes.
  - (ii) It provides for a landscaped wetland areas.
  - (iii) It naturalizes the Christchurch City Council's concrete and timber sided drains that have reached the end of their life and have started to collapse.
  - (iv) It provides a large active and passive reserve areas.
  - (v) It encourages public access to naturalized streams and provides fresh water recreation opportunities especially for families and children.
  - (vi) It will form part of the Christchurch cycle ways/walkways network.
  - (vii) It helps provide part of a very attractive large naturalized part of Christchurch where housing will have direct or almost direct access.
  - (viii) It is not only on the edge of existing residential development, it is surrounded on 3 sides by existing housing and infrastructure.
  - (ix) The land already has frontage to three roads which have their infrastructure terminated to allow for extension into the Trust's land.
  - (x) It has already had the Engineering carried out for a Plan Change including Hydraulic Modelling, Geotechnical Testing, Traffic Reports etc.
  - (xii) The storage in the Henderson Basin can be increased thereby reducing the flood risks downstream.
  - (xiii) The filled urban land will act as a bund to protect existing urban land to the east from flooding.
- 2.4 Due to the proximity to the City Centre, and Commercial and Industrial areas, the travel distances for people living on the Trust's land would be much less than some of Christchurch, all of the other proposed Greenfield sites, and several times closer than Rolleston, Rangiora and Kaiapoi.

The Trust's land is so close to the City Centre that people can walk to the City Centre in 1 hour and bike there easily within 20 minutes along the new cycleways. Hence developing the Trust's land for residential use is much more sustainable than developing land further out.

- 2.5 Much of the Trust's land is already serviced, whereas most other Greenfield sites are not, i.e.
  - (i) The roads are in place to serve the area and are less congested than roads elsewhere in the city.
  - (ii) The area is well served by Public Transport with the Orbiter and other bus routes on Sparks Road, Hoon Hay Road, and Cashmere Road.
  - (iii) The Sewage Treatment Plant for Christchurch City is a much cheaper plant to run than the smaller plants of the outlying towns of Rolleston, Rangiora and Kaiapoi.
  - (iv) There are sewer mains in each of the 3 streets that serve this land. Some of these are deep enough to serve much of the site by Gravity alone.
  - (v) Water supplies are in each street that serves this area.
  - (vi) The SW Christchurch Urban Area is well served by stormwater drains, creeks and rivers. In fact the Henderson basin is proposed to remain as an enhanced detention basin to process stormwater and to detain stormwater so as to keep flood flows to a minimum downstream.

The majority of the Henderson Basin will in time be enhanced by naturalizing waterways, deepening portions to increase detention volumes, and be landscaped to form a large regional park that has unique features such as springs and aquatic life. Such development is shown in outline form on the comprehensive development plans prepared as part of the City Council's SW Christchurch Development Plan. The development proposed by this submission could serve as the soft edge of the new park. This would be achieved by making the urban boundary a curved line that follows the land form as shown on Appendix B.

- (vii) The area is well served by power with two major electrical substations on two of the boundaries of the area.
- (viii) The telecommunication network can be simply extended into the area as the networks go all around the area at present.

- (ix) The area is already well served by reserves. In addition the South Henderson Basin area is already being developed for extra stormwater detention with a large area becoming reserves, wetlands, etc. Extending this to include the land to the east of Henderson's Road is also possible. It is intended that the Trust's land not proposed to be urban land would be gifted to the City Council to become part of the Henderson Basin reserve in lieu of infrastructure contributions.
- (x) There are 4 primary schools, 1 intermediate school, and two high schools in close proximity.
- (xi) There are two large churches within walking distance.
- (xii) The area is well served by local shops, service stations, medical centres, large shopping malls to the north, west and east, and pools at Halswell and at Pioneer Stadium. This land already has all the required community and social services already in place.
- 2.6 Efficient and close public transport is already provided for this area and already provides better access than all the other Greenfield Priority Areas.

This land is so close to the city centre that not only is bike travel viable but so is walking. There is already an excellent bus service to this area.

Car usage will be less for residents of this area than any other Greenfield site due to its proximity to the City Centre and the Commercial and Industrial areas of Christchurch, which are mostly to the south of the city. It is also handy to Canterbury University, Lincoln College, and Christchurch Polytechnic.

- 2.7 The proposed development of the Trust's land is within the concepts set out in the Christchurch City Council South West Christchurch Area Plan, and a part of the Trust's land was included as one of the first areas to be developed.
  - This shows how Urban development can proceed together with the creation of a large reserve, naturalized waterways, walkways, cycle ways, lowland forest and a large reserve for active and passive recreation. This area would attract native wildlife and could be developed to be similar to Riccarton Bush, only much larger.
- 2.8 The present Trust's land use is probably temporary, as only horticulture and residential use are economically viable due to the high value and high rates payable on such land. Even horticulture has problems with Residential so close, i.e. sprays, noise, dust, etc.

Hence the land either gets developed as proposed or remains as 4ha lifestyle blocks. 4ha lifestyle blocks this close to the city obviously are an anomaly that the Christchurch Urban Development Strategy should correct.

The best use for the Trust's land is obviously residential to the East, and a waterway and wetland reserve as shown on the attached plan, with the site providing its own stormwater disposal, as well as providing flood routing of water inflows from upstream as in the past. To leave this land rural while developing rural land twice to five times further out would be to go against the Objective of Urban Consolidation.

Removal of the existing use of the land, grazing cattle (the only viable livestock allowed) from this land removes a potential source of pollution of the streams that surround the site even with all waterways fenced off.

- 2.9 Development of the Trust's land proposed for Greenfields Priority Area Residential provides the following advantages for Greater Christchurch.
  - A. It provides affordable housing closer to the city than any other site.
  - B. It removes a natural hazard from 3.6ha of land while reducing the natural hazard of flooding downstream in the Cashmere Stream and Heathcote River.
  - C. It provides the efficient use of existing infrastructure including social infrastructure, both of which are already in place.
  - D. It assists in the creation of a Consolidated Urban Form. Development of this land will create over 50 homes versus 3 houses allowed at present. Providing 4ha house sites immediately north of a new subdivision having 15 houses per hectare makes a mockery of Chapter 6 objective of having a consolidated Urban Form.

#### 3. TIMING

Of all the areas of Greenfield Development, the eastern part of the Trust's land should be one of the first to be developed for the following reasons:

- (i) It has all the required infrastructure already in place, contrary to other Greenfield sites.
- (ii) It is the closest Greenfield site to the City Centre and therefore the most sustainable area for Greenfield development.
- (iii) It has all the Community facilities already in place.

- (iv) It provides for a much larger reserve area than would be provided by other Greenfield sites.
- (v) It provides the stormwater cleansing for those areas that drain into the proposed wetlands, reserve areas, and naturalised waterways.
- (vi) It removes cattle effluent from the area and substitutes naturalised lowland areas that cleanse runoff and reduce flooding in the Heathcote.
- (vii) It balances carbon use of the Urban Development with the absorption of carbon by the planted reserve areas.
- (viii) The environmental effect overall is much more positive than other Greenfield areas.
- (ix) It provides the start of a unique regional park that could be naturalized with native forests, large springs accessible to the public viewing, naturalized waterways, and naturalized wetlands. As such it would combine in one large park the best features of Hagley Park, Travis Wetlands and Riccarton Bush.
- (x) It can provide links between Westmorland and Schools for children on cycles without having to use busy roads.
- (xi) It adds to the network of scenic cycle ways/walkways.

#### 4. RELIEF SOUGHT

1. Amend Our Space Figure 16: Proposed locations of future development areas in Greater Christchurch as follows:

Change the status of the proposed development area as shown on Appendix B attached "Revision to Map A of Chapter 6 of the Canterbury Regional Policy Statement."

#### 2. 6.2 Schedule of Future Work

Amend 8 (page 34) as follows:-

Prepare a proposed change to Chapter 6 (Recovery and Rebuilding of Greater Christchurch) of the Canterbury Regional Policy Statement to:-

- amend Map A to be consistent with the relief sought in this submission (including 1. above and 3 below); and

- provide flexibility to accommodate meritous proposals for urban development and zoning and to facilitate a responsive planning approach to urban growth management by amending and adding to the objectives and policies as follows (insertions in bold and underlined):-

Add new Policy 6.3.1A as below:-

#### Policy 6.3.1A

- (a) Enable urban development or urban zoning outside the Greenfield Priority,
  Special Housing Areas and Existing Urban Areas shown on Map A provided
  the following conditions are met:-
  - (i) Any additional land is contiguous with a Greenfield Priority Area,

    Special Housing area, or Existing Urban Area; and
  - (ii) Any additional land will integrate with the provision of infrastructure; and
  - (iii) Any additional land is a logical addition to the urban area and will contribute to a consolidated urban form; and
  - (iv) The urban development or extension will have beneficial planning outcomes; and
  - (v) All of the criteria in Policy 6.3.11 (5)(a) to (h) inclusive are met.

#### **Explanation:**

This policy confirms the requirement for urban development to be contained within Greenfield Priority, Special Housing and Existing Urban Areas but provides some flexibility to accommodate meritous proposals and to facilitate a responsive planning approach given the uncertainties associated with the housing and business land capacity assessments which have informed Map A, and with the primary driver and influencers of urban development in Greater Christchurch.

#### 6.2.1 Recovery Framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:...

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS <u>or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;</u>

#### 6.3.1 Development within the Greater Christchurch Area

In relation to recovery and rebuilding for Greater Christchurch:

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS or which has only minor or less than minor adverse effects that will not compromise the overall CRPS urban growth management approach;

#### 6.3.7 Residential Location, Yield and Intensification

In relation to residential development opportunities in Greater Christchurch:....

- 7. Subject to Policy 5.3.4, residential greenfield priority area development shall occur **generally** in accordance with Map A. These areas are sufficient for both growth and residential relocation through to 2028.
- 3. Remove the rural/urban boundary line shown on CRPS Map A and Our Space Fig 16 (defined as the outer edge of Greenfield Priority Areas, Existing Urban Areas and Special Housing Areas) and insert in the relevant District Plans, with appropriate criteria for assessments of proposals to amend 'the line' included in the CRPS and District Plans.
- 4. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitter's land and potentially other meritous minor rural/urban boundary changes, and associated policy wording. Do <u>not</u> use streamlined processes for implementation of the overall **Our Space** strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.
- 5. Consider other amendments to the CRPS and other documents and actions as appropriate which facilitate a responsive planning approach to urban growth management of Greater Christchurch.

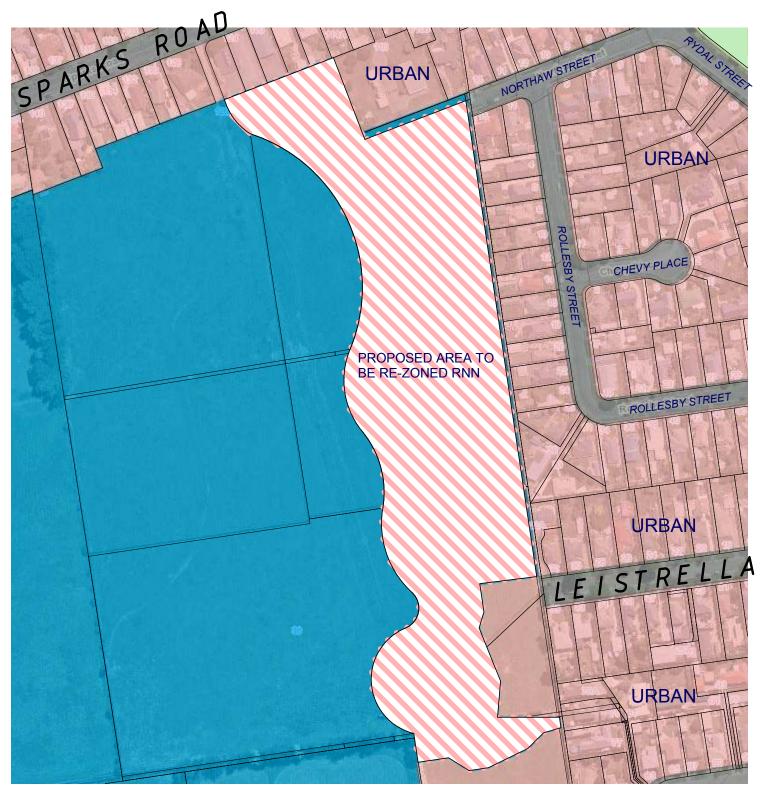
- 6. Consider streamlined RMA or other streamlined processes to facilitate the amendments sought which are specific to the Submitter's land and potentially other meritous rural/urban boundary changes, and associated policy wording. Do not use streamlined processes for implementation of the overall Our Space strategy and approach which has very significant implications and needs to be subject to rigorous RMA based evidential testing.
- 7. Such other consequential, additional or other amendments to Chapter 6 of the RPS and other documents, and any other actions, to be consistent with and give effect to the intent of this submission, including directing consequential amendment to the Christchurch City Plan to zone the proposed development area shown in **Appendix A** & B as Residential New Neighbourhood Zone.

## APPENDIX A - MAP SHOWING LOCATION, URBAN, AND RURAL LAND AT THE TRUST'S LOCATION

### LEWIS & BARROW LTD

Consulting Civil And Structural Engineers

APPENDIX - A





## APPENDIX B – MAP SHOWING THE POSSIBLE DEVELOPMENT OF THE THREE 4 HECTARE BLOCKS

