

# **Outline for Proposed Cranford Regeneration Plan**



**Proponent: Christchurch City Council**

**16 December 2016**

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## 1 What the draft Cranford Regeneration Plan is intended to achieve

This document is an Outline for the Christchurch City Council as proponent to prepare and engage on a draft Cranford Regeneration Plan. The objective of the draft Cranford Regeneration Plan is to support the regeneration of greater Christchurch by investigating the appropriateness of:

- Enabling urban residential development at the edges of the Cranford Basin which is integrated with the surrounding urban environment and proposed infrastructure works, as well as considering appropriate zones for the remaining parts of Cranford Basin;
- Providing for and, where possible, enhancing ecological values and Ngāi Tahu cultural values;
- Implementing a waterway and pedestrian and cycle connection network, including integration with adjoining residential areas, stormwater management areas and the proposed Northern Arterial Extension; and
- Amending the relevant resource management documents to facilitate and expedite the above development specifically the Canterbury Regional Policy Statement and the Christchurch District Plan, and any other applicable *Plan*<sup>1</sup>, strategy, or other *RMA document*<sup>2</sup> where relevant.

## 2 Proposed scope of the Cranford Plan

### 2.1 Geographic extent

The geographic extent of the proposed Cranford Regeneration Plan is shown in Figure 1. The entire area is wholly within the *Christchurch district*<sup>3</sup>.

A large proportion of the Cranford Basin has been designated for urban stormwater and roading purposes by the Council<sup>4</sup> and the New Zealand Transport Agency<sup>5</sup>. Development of the draft Cranford Regeneration Plan will consider the appropriateness of providing for residential, open space or rural activity outside of the designated areas, and provision of public open space and movement networks through the designated areas.

The area shown in Figure 1 is located outside the projected infrastructure boundary defined in Map A of the Canterbury Regional Policy Statement. New urban activities are allowed to occur only within existing urban areas or identified greenfield priority areas unless expressly provided for in the Canterbury Regional Policy Statement.

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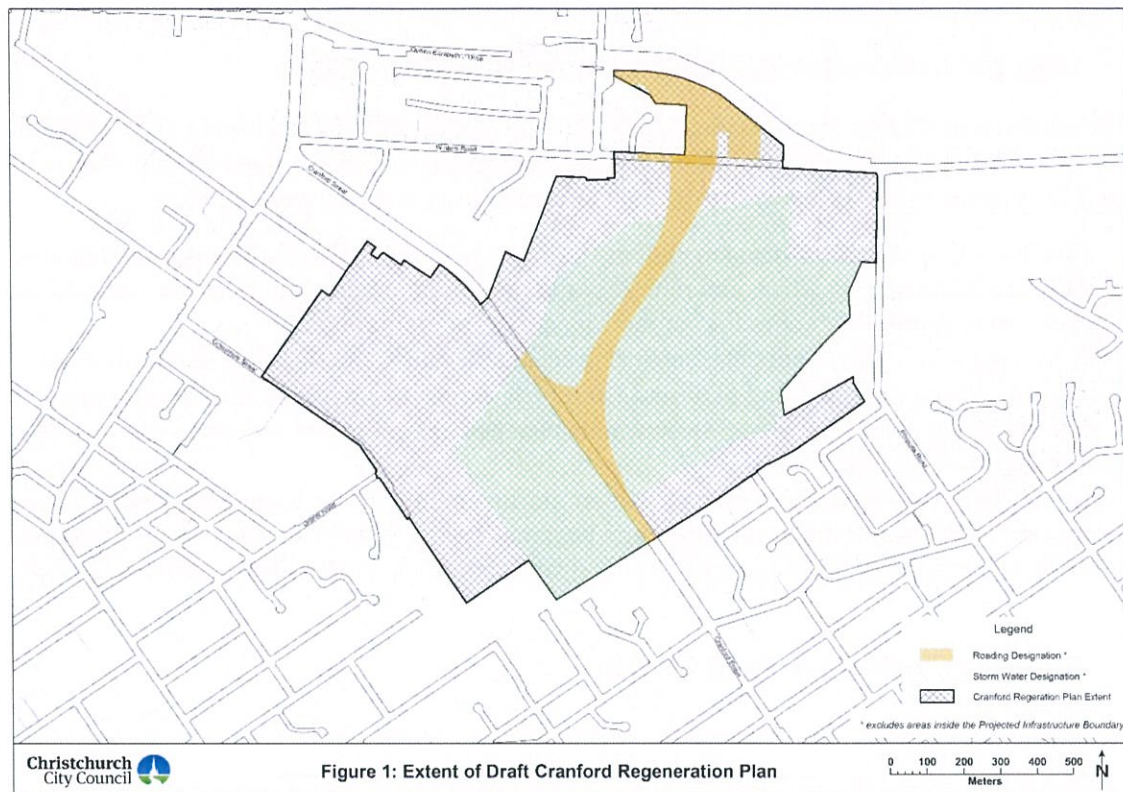
<sup>1</sup> As defined by the Greater Christchurch Regeneration Act 2016.

<sup>2</sup> As defined by the Greater Christchurch Regeneration Act 2016.

<sup>3</sup> As defined by the Greater Christchurch Regeneration Act 2016.

<sup>4</sup> Christchurch City Council Designation Number C10 Northern Arterial Extension and Cranford Street Upgrade and C128 Cranford Basin Stormwater Management Area, Chapter 10 Christchurch District Plan.

<sup>5</sup> Christchurch District Plan Chapter 10 New Zealand Transport Agency P10



## 2.2 Scope of documents possibly affected

The documents which the draft Cranford Regeneration Plan may propose changing are:

- The Canterbury Regional Policy Statement;
- The Christchurch District Plan;
- Any other relevant *Plan*, strategies, or other *RMA document* where relevant.

The draft Cranford Regeneration Plan will assess whether comprehensive development of Cranford Basin needs to occur in a timely and coordinated manner and, if so, what tools may be available for that.

### 2.3 Time period for the Cranford Regeneration Plan

The Cranford Regeneration Plan would be intended to be in effect until 2021, or a longer period if the Greater Christchurch Regeneration Act 2016 (the Act) is extended.

**3 Explanation of how the draft Cranford Regeneration Plan is intended to meet one or more of the purposes of the Act**

The purpose of the Act states that “*This Act supports the regeneration of greater Christchurch through the following purposes:*”

- (a) *enabling a focused and expedited regeneration process;*
- (b) *facilitating the ongoing planning and regeneration of greater Christchurch;*
- (c) *enabling community input into decisions on the exercise of powers under section 71 and the development of Regeneration Plans;*



- (d) *recognising the local leadership of Canterbury Regional Council, Christchurch City Council, Regenerate Christchurch, Selwyn District Council, Te Rūnanga o Ngāi Tahu, and Waimakariri District Council and providing them with a role in decision making under this Act;*
- (e) *enabling the Crown to efficiently and effectively manage, hold, and dispose of land acquired by the Crown under the Canterbury Earthquake Recovery Act 2011 or this Act.*

The Act defines **regeneration** and **urban renewal** as follows<sup>6</sup>:

**regeneration** means—

- (a) *rebuilding, in response to the Canterbury earthquakes or otherwise, including—*
  - (i) *extending, repairing, improving, subdividing, or converting land;*
  - (ii) *extending, repairing, improving, converting, or removing infrastructure, buildings, and other property;*
- (b) *improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through—*
  - (i) *urban renewal and development;*
  - (ii) *restoration and enhancement (including residual recovery activity)*

**urban renewal** means the revitalisation or improvement of an urban area, and includes—

- (a) *rebuilding;*
- (b) *the provision and enhancement of community facilities and public open space.*

The proponent is satisfied that the proposed Cranford Regeneration Plan supports both aspects of the definition of “regeneration” of greater Christchurch: both “improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through urban renewal and development”; and “rebuilding, in response to the Canterbury earthquakes or otherwise”.

#### **Improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through urban renewal and development**

“Urban renewal” and “development” are separate concepts in part (b)(i) of the definition of “regeneration”. The definition of “urban renewal” as a stand-alone phrase, rather than a definition of “urban renewal and development”, makes that clear. Conversion of the currently under-developed areas of Cranford Basin to residential uses would be “development”. The provision of new residential use in this location may have the effect of improving the environmental, economic, social, and cultural well-being of communities. As a result, if the draft Cranford Regeneration Plan concludes that residential use of land in Cranford Basin is appropriate, it will be development that supports part (b) of the definition of “regeneration” in the Act.

If part (b)(i) of the definition of “regeneration” is interpreted as requiring both “urban renewal” and “development”, the proponent is satisfied that the draft Cranford Regeneration Plan can provide for “urban renewal”. The definition of “urban renewal” is “the revitalisation or improvement of an urban area”. “Urban renewal” includes, but is not confined to, “rebuilding”.

Cranford Basin is currently located outside of the urban area identified in the Canterbury Regional Policy Statement, but is completely encompassed by and connected to the surrounding urban land. It is an anomalous underdeveloped pocket within the urban fabric of Christchurch. The local community

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<sup>6</sup> Section 3(2) of the Greater Christchurch Regeneration Act 2016.



can be revitalised and improved by considering urban uses of this land. The proponent considers at this stage that provision for the possible land uses and developments being investigated for the draft Cranford Regeneration Plan could be providing for the revitalisation or improvement of a Christchurch urban area as they may:

- Convert inefficiently used, isolated and functionally obsolete former agricultural land around the fringes of parts of Cranford Basin for residential purposes in a manner that is integrated with the proposed multi-purpose stormwater facility and transport projects. Appropriate land use zoning and its subsequent development, which is integrated with the proposed adjacent infrastructure, will result in the urban renewal and development of this area, and improve the environmental, economic, social, and cultural wellbeing of the local community;
- Promote urban consolidation through the re-zoning of land for residential purposes in close proximity to the Papanui/Northlands District Centre/Key Activity Centre. That proximity will enhance the function and efficiency of the centre, particularly with the opportunity for pedestrian and cycle access and support for public transport routes, which will improve the economic and social wellbeing of communities;
- Enable comprehensive development of the relatively large existing lot sizes for residential purposes (including residential medium density), enabling better urban design outcomes, rather than ad hoc 'infilling' of adjacent urban areas, which will contribute positively to the urban renewal and development of the area;
- Provide for enhancement of existing waterways through naturalisation and the protection and enhancement of springs outside of the stormwater management area, which have been identified as taonga by Te Ngāi Tūāhuriri Rūnanga, contributing to the environmental wellbeing of communities;
- Remove the potential for adverse effects on surrounding residential areas arising from rural based activity, which will contribute to the social and environmental well-being of the local community;
- Enable restoration and enhancement of ecological and cultural values both on- site and off- site, and opportunities for recreation and community connections;
- Act as a catalyst for renewal and revitalisation of older housing stock between Cranford Basin and the Papanui/Northlands Key Activity Centre; and
- Improve community wellbeing by creating housing of varying density close to community facilities and public open space.

### **Rebuilding, in response to the Canterbury earthquakes or otherwise**

The proponent also considers that the proposed Cranford Regeneration Plan supports "rebuilding".

Part (a) of the definition of "regeneration" refers to rebuilding. "Rebuilding" is not defined in the Act but the definition of "regeneration" demonstrates that it is to be given an expansive interpretation. That definition states that "rebuilding" includes: "extending", "improving" and subdividing land; "extending" infrastructure, buildings and other property; and "improving" infrastructure, buildings and other property.

"Rebuilding" is therefore not confined to the replacement of previous or existing structures. It encompasses material improvement in a broader sense, including improving, subdividing and converting land from one land use to another. In this context the "rebuilding" sought by the Act is the rebuilding of the contribution that material development and property improvement makes to the wellbeing of the communities of greater Christchurch, rather than a narrow focus on rebuilding structures and infrastructure.



As described above, the land within Cranford Basin is an underdeveloped pocket of land within the Christchurch urban area. That land has been affected by the Canterbury earthquakes. Investigation of appropriate provision for use of parts of it for stormwater detention, ecological and open space benefits or residential development is “rebuilding” of the contribution that this land may make to the wellbeings of the community.

As a result of the matters described above, the proponent considers that a draft Cranford Regeneration Plan will achieve the overarching purpose of supporting the regeneration of greater Christchurch.

### **3.1 Enabling a focused and expedited regeneration process<sup>7</sup>**

The proponent considers that, in comparison with the alternatives (section 71 of the Act, a Resource Management Act plan change process, resource consent applications or retaining the status quo), use of a regeneration plan provides for a focused and expedited process for achieving the regeneration objective in relation to Cranford Basin because:

- a Council initiated Resource Management Act plan change process cannot be notified until after 30 June 2021<sup>8</sup> and progressing this proposal via a Regeneration Plan enables integration with the adjacent stormwater and transport projects;
- the regeneration plan process enables more community input into the draft plan development and decision making process than section 71 of the Act; and
- a resource consent process is less likely to achieve integrated and efficient residential development, will be inconsistent with both the Canterbury Regional Policy Statement and the Christchurch District Plan, and may be subject to appeals.

The draft Cranford Regeneration Plan will investigate options for lifting the restrictions that are preventing urban residential development in Cranford Basin. It will also investigate whether any methods are needed, or available, to bring new residential development to market. The proponent understands that two major developers are ready to begin the development process.

The implementation of the proposed Cranford Regeneration Plan concurrently with the planning for the large stormwater management facility in Cranford Basin will enable the proponent to better achieve holistic and integrated land use planning. The Cranford stormwater management facility is currently being designed, and certainty around how the proposed residential development will be developed would assist the Council to identify where key linkages will need to go in order to enhance connectivity. Investigating the draft Cranford Regeneration Plan now, in conjunction with the development of the Basin for stormwater purposes, will therefore facilitate a focused and expedited regeneration process.

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<sup>7</sup> Section 3(1)(a) of the Act.

<sup>8</sup> Schedule 7 of the Greater Christchurch Regeneration Act 2016 extends the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 to 30 June 2021.

### **3.2 Facilitating the ongoing planning and regeneration of communities in greater Christchurch<sup>9</sup>**

Development of the draft Cranford Regeneration Plan will consider Cranford development within the wider context of Greater Christchurch, particularly whether there are likely to be any adverse effects on the recovery of housing in the Central City.

The draft Cranford Regeneration Plan will enable the proponent to better achieve holistic and integrated land use planning. As described above, the Cranford stormwater management facility is currently being designed and certainty around how the proposed residential development will be developed would assist the Council to identify where key linkages will need to go in order to enhance connectivity. This process will achieve improved social, cultural, economic and environmental outcomes.

### **3.3 Enabling community input into decisions on the development of Regeneration Plans<sup>10</sup>**

The Act enables community input into the development of regeneration plans and requires consideration of that input. Moreover, the proponent proposes that there will also be on-going engagement with landowners in the Cranford Basin and public open days, both during development of the draft Cranford Regeneration Plan and once the draft Cranford Regeneration Plan is notified for comments.

### **3.4 Recognising the local leadership of Canterbury Regional Council, Christchurch City Council, Regenerate Christchurch, Selwyn District Council, Te Rūnanga o Ngāi Tahu, and Waimakariri District Council and providing them with a role in decision making under this Act<sup>11</sup>**

The Christchurch City Council as proponent is the authority with the most direct statutory responsibility for decision making regarding the use of land in the Cranford Basin. The Christchurch City Council has resolved to investigate the appropriateness of amendments to its district plan and to the Canterbury Regional Policy Statement, and any other amendments to a *Plan* or *RMA document*, that enables residential development in the Cranford Basin. By that resolution the proponent is showing a desire to advance the regeneration objective of the Act for the Cranford Basin area and for its surrounding communities. Enabling the proponent to prepare a draft Cranford Regeneration Plan that addresses land use in that area achieves the purpose of recognising the local leadership of the Christchurch City Council in relation to such matters. Engagement with the other relevant parties has been ongoing for several months.

## **4 Proposed process for the development of the draft Cranford Regeneration Plan**

### **4.1 Work undertaken to date**

In preparing this Outline, the proponent has:

- Commissioned or had the benefit of a number of reports that relate to the area. These reports include geotechnical, traffic, cultural impact assessment, contaminated land and ecology and

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<sup>9</sup> Section 3(1)(b) of the Act.

<sup>10</sup> Section 3(1)(c) of the Act.

<sup>11</sup> Section 3(1)(d) of the Act.



include reports that were commissioned as part of the section 32 process for the replacement Christchurch District Plan. These reports will be used in development of the draft Cranford Regeneration Plan;

- Held a number of workshops with Council staff and relevant technical experts to identify potential options for the layout of development, key infrastructure and possible housing densities;
- Met with affected landowners within the Cranford Basin to seek their initial views on the development of a draft Cranford Regeneration Plan and their intentions for their landholdings; and
- Held regular meetings with Canterbury Regional Council, Te Rūnanga o Ngāi Tahu, Regenerate Christchurch, Ōtākaro Limited and the Department of the Prime Minister and Cabinet – Greater Christchurch Group (DPMC) to seek their views on development of the Outline.

#### **4.2 Collaboration with Parties**

The Act requires that views are sought from certain parties including the Canterbury Regional Council, Te Rūnanga o Ngāi Tahu, Regenerate Christchurch, Ōtākaro Limited and the chief executive of the DPMC. The proponent will continue to hold regular collaborative meetings with the parties throughout the development of the draft Cranford Regeneration Plan. The proponent will also meet with parties on an individual basis as required. (A concise statement recording the views of the parties on the draft Outline is attached as Appendix 2).

#### **4.3 Framework for development of the draft Cranford Regeneration Plan**

Council as the proponent will develop the draft Cranford Regeneration Plan with input from technical experts including external consultants. In developing the draft Cranford Regeneration Plan it is intended to:

- Consider the appropriateness of a number of options for residential zoning for parts of the Cranford Basin taking into account the land capability, cultural values, feasibility of residential development and linkages with adjoining urban areas and infrastructure to ensure integrated co-ordinated development. The ground conditions in the Cranford Basin require careful consideration;
- Minimise effects of potential residential development on natural processes, particularly the hydrogeology of the Cranford Basin and the wider area. A number of technical reports will be used to develop the draft Cranford Regeneration Plan and consider appropriate zoning, including those relating to geotechnical conditions, traffic, contaminated land, cultural impact, ecology and springs;
- Ensure that the proponent obtains technical information at a level suitable for the scale and effects of proposed land uses;
- Consider appropriate use and zoning of land that is not feasible for residential use;
- Consider options to amend the underlying zoning for the designated land from Rural Urban Fringe to another zoning such as Open Space;
- Describe regeneration benefits in relation to the Central City, anchor projects and other centres;
- Include information on any significant land remediation requirements;
- Include information on the zoning, type, density and quantum of any residential development proposed;
- Include analysis of the timing and integration across multiple landowners of expected development in the rezoned area; and

- Ensure that any amendment(s) to include an area of Cranford Basin as a Greenfield Priority Area in the Canterbury Regional Policy Statement gives effect to the Canterbury Regional Policy Statement.

#### **4.4 Opportunities for public engagement**

The proponent will carry out public engagement. All engagement and communications on the draft Cranford Regeneration Plan will follow IAP2<sup>12</sup> principles and the following engagement policy of the proponent:

- Decision-makers are well informed, aware of and take into account the community's views;
- The Council will use a consistent approach to establishing the significance of a matter requiring a decision;
- The level of engagement will be tailored to the level of significance for each issue, proposal or decision;
- Decision-making and engagement processes are transparent and clearly expressed;
- The community will have clarity on the range of engagement methods the Council may use relative to the significance of a matter; and
- Engagement is proactive, inclusive, accessible, a two-way dialogue, and people are aware of and understand the final decisions taken.

The proponent intends to involve the public prior to formal notification through one or more of the following methods:

- Making information and knowledge about the Cranford Basin and its locality publicly available and accessible;
- Holding a drop in session;
- Providing multiple ways for individuals and communities to provide feedback;
- Meeting with groups who have specific interest in the Cranford Basin and its locality and landowners within and adjoining the Cranford Basin, to seek their views and input into the development of the draft Cranford Regeneration Plan.

In addition to the opportunities outlined above, Regenerate Christchurch will notify the draft Cranford Regeneration Plan and invite written comment in accordance with section 34 of the Act and the timeframes outlined in Figure 2 of this outline. If the draft Cranford Regeneration Plan is notified for written comment by Regenerate Christchurch, there will be:

- On-going meetings with landowners within the draft plan area; and A drop-in session, to be held at an accessible location within the Papanui/Cranford Basin area. The purpose of the drop-in is to explain the draft Cranford Regeneration Plan and answer questions, to assist the public to make written comment. The drop-in will be advertised via correspondence with owners and adjoining owners, on the Council website, at Council libraries and service centres, and via social media.

The proponent will consider all comments, input and feedback received from the public during the development of the draft Cranford Regeneration Plan in accordance with Section 35 of the Act.

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<sup>12</sup> The International Association for Public Participation

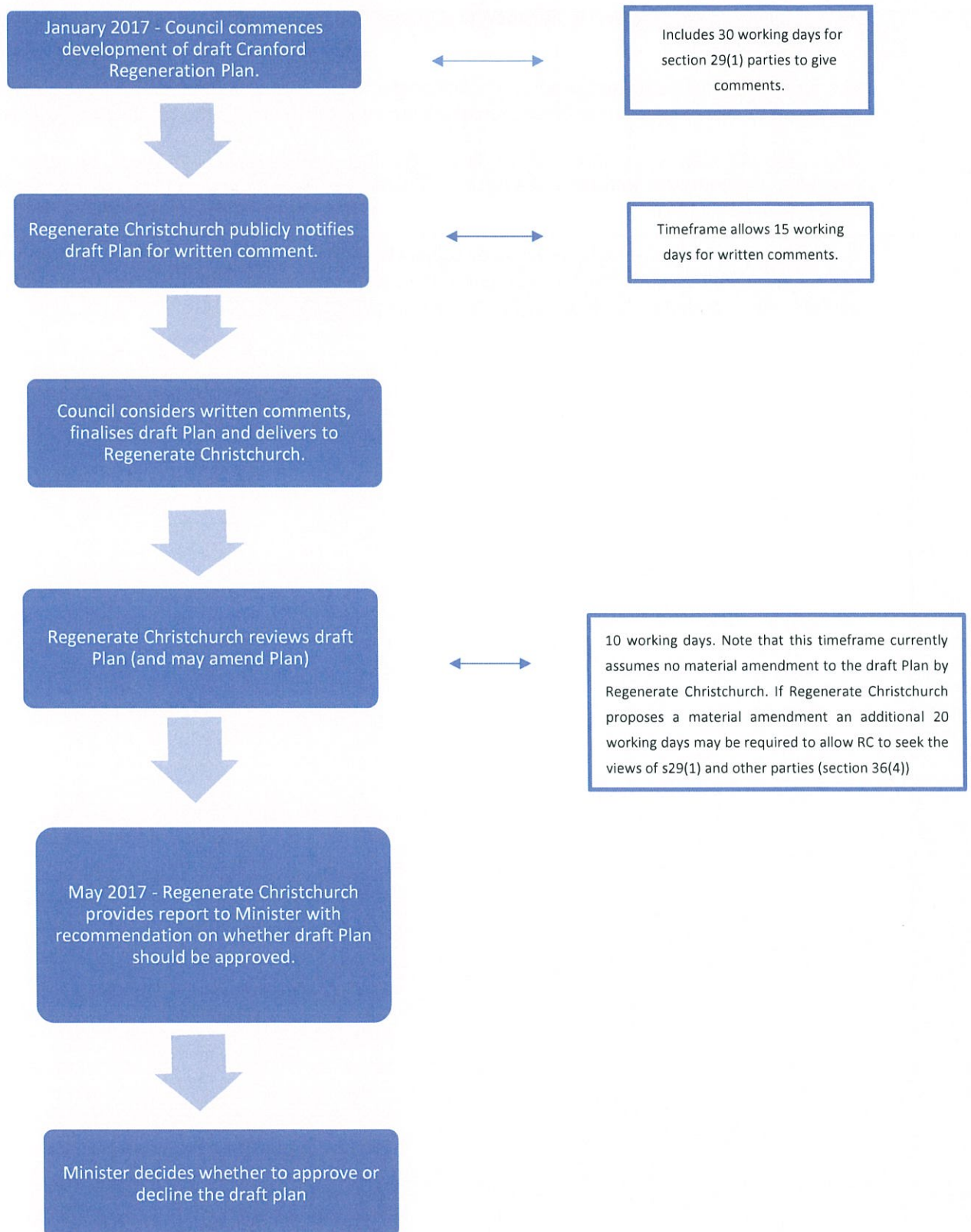


#### **4.5 Expected timeframes if Regenerate Christchurch recommends outline to Minister for approval**

The following timeframes and process are anticipated for the development of the draft Cranford Regeneration Plan if Regenerate Christchurch recommends the outline to the Minister for approval.

**Note:** This timeframe assumes 10 working days for Regenerate Christchurch to provide a recommendation to the Minister and a further 10 working days for the Minister to approve/decline draft regeneration Plan.

The timeframe is indicative only, and may be subject to change to allow, for example, the proponent to take more time towards the development of the regeneration plan; or if feedback from strategic partners was provided earlier than the maximum time provided for in the Act.





## **5 How the costs of developing the draft Cranford Regeneration Plan will be met**

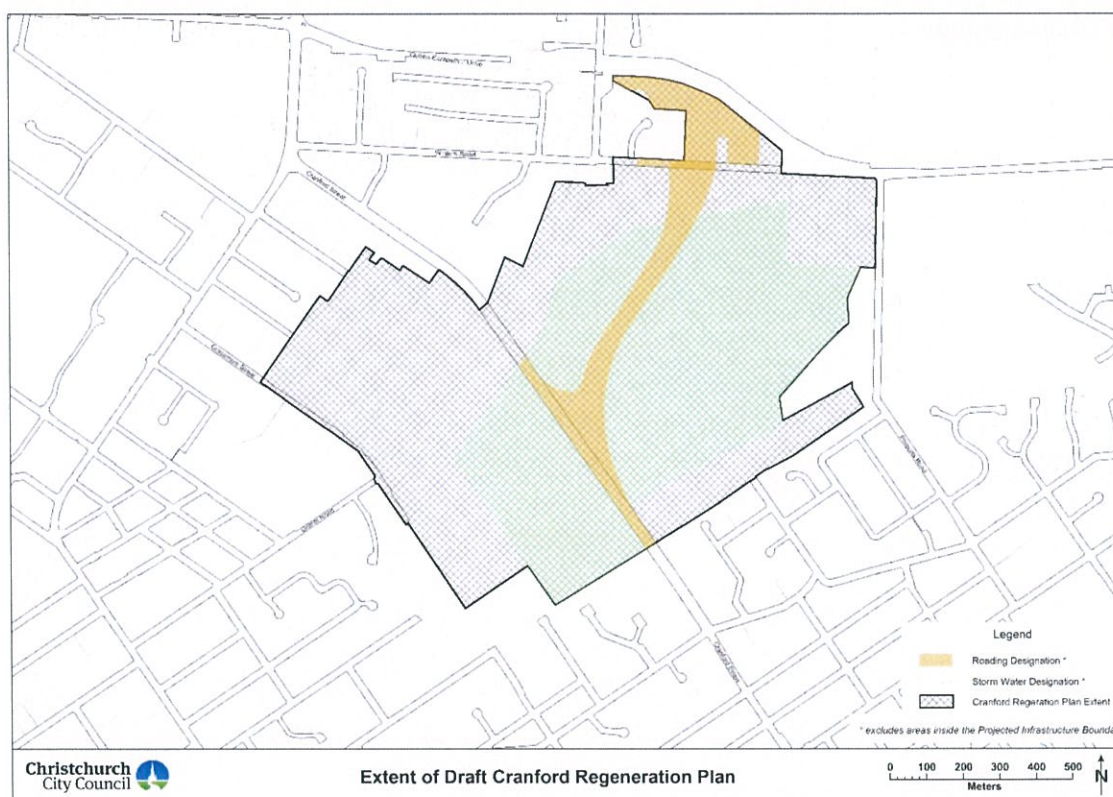
The costs of developing the draft Cranford Regeneration Plan, including this Outline and public engagement, will be funded by the proponent from existing budgets. Other parties involved in this process will be responsible for meeting their respective costs, such as those costs associated with 'processing' any possible Regeneration Plan.

## **6 Draft of the Notice to be published if the Minister approves the Outline**

A draft of the notice that would be published under section 31(3) if the Minister approves the Outline is set out in **Appendix 1**.

**Appendix 1 Public Notice****Greater Christchurch Regeneration Act****Outline – Cranford Regeneration Plan**

Pursuant to section 31 of the Greater Christchurch Regeneration Act 2016 the Minister supporting Greater Christchurch Regeneration has approved an Outline for the Christchurch City Council to develop a draft Cranford Regeneration Plan. The area of the draft Cranford Regeneration Plan is shown in the following map:



The objective of preparing the draft Cranford Regeneration Plan is to assist regeneration of greater Christchurch principally by investigating the appropriateness of residential development at the edges of the Cranford Basin. The draft Cranford Regeneration Plan may propose to amend the Canterbury Regional Policy Statement and the Christchurch District Plan and any Plans and any RMA documents necessary to facilitate residential development in the Cranford Basin. The Christchurch City Council will develop the draft Cranford Regeneration Plan and undertake public engagement, including notifying an opportunity for written comments. The Christchurch City Council intends to submit a draft plan to Regenerate Christchurch in May 2017.

The Outline for the Cranford Regeneration Plan can be viewed on the Christchurch City Council website at [www.ccc.govt.nz](http://www.ccc.govt.nz) and copies are available at the Papanui Library and the Redwood Library.

Date:

Ivan Iafeta, Chief Executive  
Regenerate Christchurch



## Appendix 2 Concise Statement of Views







10 NOV 2016

Dr Karleen Edwards  
Chief Executive  
Christchurch City Council  
[karleen.edwards@ccc.govt.nz](mailto:karleen.edwards@ccc.govt.nz)

Tēnā koe Karleen

Thank you for your letter of 28 October 2016 seeking my views on the draft Outline for the Cranford Regeneration Plan. This draft Outline marks an important milestone in the regeneration phase of greater Christchurch's recovery.

I note, for the purposes of clarity and avoidance of doubt, that I provide these views on the draft Outline in my role as Chief Executive of the Department of the Prime Minister and Cabinet – a party identified in the Greater Christchurch Regeneration Act (the Act) under section 29(1). This is separate to the role of the Minister supporting Greater Christchurch Regeneration (the Minister) in making a final decision on the draft Outline under section 31. The views provided in this letter should not be interpreted as representing the views of the Minister.

My views are:

- The draft Outline provides the information required under section 28 of the Act.
- In my capacity as chief executive responsible for administration of the relevant parts of the Act, I note there are some minor inconsistencies between the wording of the draft Outline and the Act. These minor comments are attached (**Attachment A**).

Additionally, I note some expectations for the next phase:

- If the final Outline is approved and a draft Regeneration Plan is developed, I would expect to see a draft Plan that has been developed in accordance with the final Outline, as required under section 33(1).
- I would also expect to see further evidence and/or discussion supporting the case for the proposals of a draft Plan, and why these forms of regeneration are considered to be both desirable and needed in the Cranford Basin. For example, the draft Outline notes that Cranford Basin is an anomaly in the urban form of Christchurch and there is an opportunity to consider its long term future use. I would expect a draft Regeneration Plan to provide additional commentary and evidence supporting the

proponent's case for rectifying this apparent anomaly at this point in time, from a wider land use perspective.

My officials and I look forward to continue working with Christchurch City Council, and are available to provide continued advice and support as required to assist this process. I appreciate the work the Council has put into this draft Outline and congratulate you on a process which has been both robust and collaborative.

Naku nōa, nā



Andrew Kibblewhite  
Chief Executive  
**Department of the Prime Minister and Cabinet**

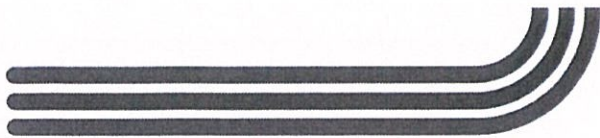


Draft Outline Cranford Regeneration Plan  
Minor technical comments

PAGE NUMBER	SECTION / PROVISION / SENTENCE	COMMENT
3	'...and to other Resource Management Act plans...'	Suggest 'documents' instead of 'plans' for consistency with language used in the GCR Act.
6	Section 3.6: <i>Conclusion on how the Plan will seek to achieve one or more of the purposes of the Act</i>	Suggest including additional caveats in the title, e.g. <i>'Conclusion on how the proponent expects the Plan will seek to achieve one or more purposes of the Act'</i> for consistency with language used in the GCR Act.
9	<i>January 2017 – Regenerate Christchurch recommends the Outline to the Minister and submits for approval</i>	Suggest this is re-worded to reflect that, under section 30(3) of the GCR Act, Regenerate Christchurch may make amendments to the draft outline, and to reflect that Regenerate Christchurch may recommend the outline to the Minister.
9	<i>June – July 2017 – Regenerate Christchurch reviews draft Plan and makes amendments</i>	Suggest this is reworded to reflect that Regenerate Christchurch may choose not to make amendments to the draft Plan (e.g. <i>'Regenerate Christchurch reviews draft Plan and makes amendments if required'</i> )
	<i>July – August 2017 – Regenerate Christchurch recommends to Minister and submits draft Plan for approval</i>	Suggest clarifying this to reflect that Regenerate Christchurch will make a recommendation on the draft Plan to the Minister – that is, Regenerate Christchurch will provide a recommendation to this Minister on whether he should approve the draft Plan
9	<i>August – September 2017 – Minister approves or declines draft Plan</i>	Note that the date for the 2017 General Election has not been announced by the Prime Minister. If Ministerial decision-making is planned in close proximity to the 2017 General Election, this will impact on this timeframe. We will work with you on this matter.
12	Appendix 2	Suggest changing <i>'May 2017'</i> to <i>'June 2017'</i> in the second paragraph, for consistency with the timeframes in the draft Outline at section 4.5.







03 353 9600  
info@regeneratechristchurch.nz  
regeneratechristchurch.nz

21 November 2016

*Reference: Draft Outline - Cranford Regeneration Plan*

Christchurch City Council  
PO Box 73016  
Christchurch 8154  
Attention: Dr Karleen Edwards

By Post & Email: [karleen.edwards@ccc.govt.nz](mailto:karleen.edwards@ccc.govt.nz)

Dear Karleen,

#### **Draft Outline: Cranford Regeneration Plan**

Thank you for your letter of 28 October 2016 submitting the draft outline for the Cranford Regeneration Plan for Regenerate Christchurch's review.

The Greater Christchurch Regeneration Act 2016 (GCR Act) provides the statutory framework for Regenerate Christchurch's role in the development of Regeneration Plans for the Christchurch district. Regenerate Christchurch has two statutory functions when a proponent proposes a draft outline for a Regeneration Plan for the Christchurch district:

- It may provide a view on a draft outline prepared by a proponent (section 29(1)).
- It must review an outline submitted to it by a proponent and decide whether to recommend the outline to the Minister for approval (section 30). Regenerate Christchurch may amend the outline before recommending it to the Minister.

The GCR Act requires that the exercise of Regenerate Christchurch's functions be framed by Regenerate Christchurch's purpose and objectives as specified in the GCR Act and the purposes of the GCR Act. In particular section 124 of the GCR Act requires that in performing its functions, Regenerate Christchurch must not act inconsistently with the GCR Act, any Plan<sup>1</sup> and any lawful requirements.

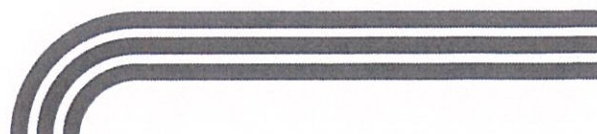
It is within the above context that the Board of Regenerate Christchurch has considered the draft outline and provides the following comments:

#### What the Plan is intended to achieve

- We consider that the draft outline clearly sets out what the Regeneration Plan for Cranford Basin is intended to achieve.

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<sup>1</sup> As that term is defined in section 4 of the GCR Act.





- We recommend deletion of the section headed “Why a Regeneration Plan for Cranford Basin?” on the basis that this information is repeated in the scope and purpose sections of the draft outline and it more comfortably sits within those sections.

#### Proposed scope of the Plan

- The primary focus of this section is to identify the places and things that the Regeneration Plan will apply to.
- As regards geographical scope (place), the key to the map at Figure 1 does not identify the land to be considered for residential development. Rather it identifies the current zoning of that land which suggests that the designated land has a different zoning.
- It would be helpful if the extent of land being considered for rezoning, ie residential activity and open space, were identified.
- Section 2.2 of the draft outline should focus on the things that the draft Plan will apply to rather than the content of the Plan and also use terminology that is consistent with the GCR Act. Primarily this requires identification of the RMA documents and Plans (as those terms are defined in the GCR Act) to which the proposed Cranford Regeneration Plan may direct amendments.<sup>2</sup> We do not consider that there is a need to identify the content of those amendments nor do we think it advisable to do so in the draft outline.
- In performing its functions Regenerate Christchurch must not act inconsistently with any Plan (as that term is defined in the GCR Act)<sup>3</sup>. At the outline stage, we consider that this requirement can be satisfied by ensuring that the proposed scope extends to any amendments that may be required to a Plan to address any inconsistencies.
- Our expectation is that, in taking account of our views, the content of this section of the draft outline could be reduced.

#### Purposes of the GCR Act

- A critical feature of any Regeneration Plan is that it must support the regeneration of greater Christchurch through one or more of the purposes set out in section 3(1) of the GCR Act.
- Section 28(2)(c) of the GCR Act requires a draft outline to include an explanation of how the proponent expects the Plan to meet one or more of the purposes of the GCR Act. Simply stating that the Plan will meet the purposes of the GCR Act is not sufficient.
- The draft outline would benefit from a more comprehensive explanation of how the well-being and resilience of surrounding urban areas is expected to be improved through the urban renewal and development of Cranford Basin. Correspondingly we consider that there is a need to demonstrate that those urban areas are in need of regeneration. The inclusion of this information will, in our view, provide a clearer rationale for how the Cranford Regeneration Plan is expected to support regeneration.
- We also consider that in order for the draft Plan to support regeneration, a comprehensive development of the Cranford Basin land needs to occur in a timely and coordinated manner. Appropriate measures should be put in place through the draft Plan to ensure this and the outline should make provision for the consideration of such measures.

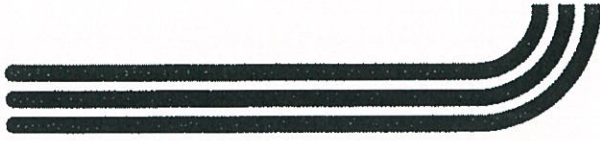
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<sup>2</sup> Section 61 of the GCR Act refers.

<sup>3</sup> Section 124 of the GCR Act







- In order to meet the purpose of the GCR Act as detailed in section 3(a) of *"enabling a focused and expedited regeneration process"* the outline needs to demonstrate that the well-being and resilience of surrounding communities will only be improved if the future residential development of Cranford Basin occurs with speed and efficiency. This requires an assessment of the timeframes within which this land needs to be made available to support the regeneration.
- We question the need to include detailed explanations of how the draft Plan will meet the purposes set out in sections 3(c) (community input) and 3(d) (local leadership) of the GCR Act. The statutory process for the development of a Regeneration Plan implicitly gives effect to those purposes.

#### Proposed process for development of the Plan

- Section 4.3(a) of the draft outline contradicts the proposed scope of the draft Plan which identifies that there may be a need to amend existing Recovery Plans. We recommend the deletion of this section.
- When determining the appropriate residential zoning (section 4.3(b)) a key consideration should be how the various options will support the achievement of the best regeneration outcomes for the city.
- Section 4.3(e) of the draft outline states that rural zoning may be retained for land where insufficient information is held to determine an appropriate residential zoning. We believe that a comprehensive outcome should be strived for and this can only be achieved by giving due consideration to the rezoning of all of the available land. The retention of rural zoning for parts of the land would, in our opinion, undermine some of the stated objectives of the draft Plan, in particular urban consolidation and holistic and integrated land use planning. If rural zoning is to be retained, this should be an active decision based on evidence, rather than a passive one because of a lack of evidence.
- We note that the draft Plan will consider the multiple hazards and constraints affecting the site including peat ground conditions, land contamination and hydrogeology. An appropriate balance must be struck between expediency and ensuring the achievement of resilient and sustainable regeneration outcomes. Steps should be taken throughout the development of the draft Plan to ensure that the level of technical information sought (including land remediation requirements) is suitable to the scale and effects of the proposed rezoning. The draft outline should clearly state that the Council as proponent will be responsible for obtaining any information needed to assess the environmental effects of the proposed rezoning (including any peer reviews that may be required to support that assessment) and all associated costs.
- Subject to the above comments, Regenerate Christchurch considers that the proposed process as set out in the draft outline is appropriate.

#### Opportunities for public engagement

- Sections 3.2 and 3.4 suggest that there will be significant community input into the development of the draft Plan, however, the engagement section of the draft outline does not reflect this. Engagement opportunities during the Plan development phase are restricted to specific stakeholders rather than the general public. We would encourage the Council to provide opportunities for public involvement in the development of the draft Plan.
- The draft outline would benefit from greater clarity on who will be considered to be an adjoining owner and the approach that will be taken to identify groups with a specific interest in the proposed Regeneration Plan.







- Whilst the GCR Act requires RC to notify the outline and the draft Plan it is our expectation that Council will be responsible for preparing the required public notices, Gazette notices and the preparation of the required website content together with all associated costs.

#### Timeframes

- Section 28(2) of the GCR Act only requires the draft outline to identify the expected timeframes for the development of the draft Plan, the Minister to approve the draft Plan and Regenerate Christchurch to perform its functions. It does not need to set out timeframes for the outline stage. We recommend that all of the timeframes be calibrated off the date of publication of the outline.
- The January 2017 timeframe box within section 4.5 of the draft outline predicates that Regenerate Christchurch will recommend the draft outline to the Minister for approval. We suggest that in order to achieve consistency with the GCR Act this wording be amended to reflect that Regenerate Christchurch may recommend the outline to the Minister. We also suggest that the text within this box acknowledge that Regenerate Christchurch has the opportunity to amend the outline and that contingency be built into the timeframe for Regenerate Christchurch to undertake this task (if desired).
- The June – July 2017 timeframe box predicates that Regenerate Christchurch will review the draft Plan and then make amendments to the same. We suggest that this text be amended to achieve consistency with section 36(3) of the GCR Act which states that Regenerate Christchurch may amend the draft Plan.
- In the July – August 2017 timeframe box, the text requires amendment to accurately reflect the statutory process. At this step, Regenerate Christchurch is required to provide a recommendation on whether the Minister should approve the draft Plan.

#### Other matters

- We suggest that you delete "Appendix 1 Statement of views of parties" from the draft outline on the basis that there is no requirement for this statement to be appended to the outline.
- The proposed Cranford Regeneration Plan may be a catalyst for other landowners to seek the rezoning of land through a Regeneration Plan process. We would like to understand the steps that the Council will take to ensure that any such requests can be appropriately managed.

Please note that some of the above comments do not relate to the content of the draft outline and accordingly do not necessarily need to be responded to by amending the draft outline. Rather they can be addressed in a covering letter at the time of submission of the outline to Regenerate Christchurch under section 29(2)(b) of the GCR Act.







03 353 9600

info@regeneratechristchurch.nz  
regeneratechristchurch.nz

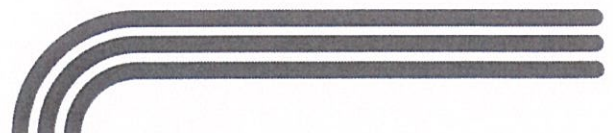
If any of the above is unclear or you wish to discuss any of the matters raised, please do not hesitate to contact us. We look forward to the receipt of the outline pursuant to section 29(2)(b) of the GCR Act at the earliest possible opportunity.

Yours sincerely

Ivan Lafeta  
Chief Executive

Copied to:

Kelvan Smith	Director	Greater Christchurch Group	Kelvan.Smith@dpmc.govt.nz
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Bill Bayfield	Chief Executive	Environment Canterbury	Bill.Bayfield@ecan.govt.nz
Arihia Bennett	Chief Executive	Te Rūnanga o Ngāi Tahu	Arihia.Bennett@ngaitahu.iwi.nz
Richard Osborne	Head of Planning	Christchurch City Council	Richard.Osborne@ccc.govt.nz







30 November 2016



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Karleen Edwards  
Chief Executive  
Christchurch City Council  
[Karleen.edwards@ccc.govt.nz](mailto:Karleen.edwards@ccc.govt.nz)

Dear Karleen

### Canterbury Regional Council views on the Draft Outline: Cranford Regeneration Plan

Thank you for providing the Draft Outline: Cranford Regeneration Plan, to Canterbury Regional Council for comment.

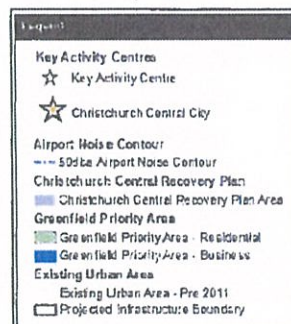
Under Section 29(1) of the Greater Christchurch Regeneration Act 2016 (the Act), Canterbury Regional Council (CRC) provides the following views on the Draft Outline.

An overarching interest held by CRC in relation to any proposed amendments to the Canterbury Regional Policy Statement (CRPS) is that the integrity of the CRPS is maintained.

CRC's specific comments on the draft Outline are:

1. The CRC recommends that all references to Chapter 6 of the CRPS are amended to align with the terminology in the CRPS and the legend of Map A. For example,

- a. in Section 2.1, paragraph 3 should be amended to read:  
*'The extent of the Plan as shown in Figure 1 of the draft Outline is not included within an existing urban area and is located outside the projected infrastructure boundary defined in Map A of the CRPS. New urban activities are allowed to occur only within existing urban areas or identified greenfield priority areas unless expressly provided for in the CRPS.'*



*To facilitate residential development in Cranford Basin the key amendment required to the CRPS is a change to Map A to include the area in Cranford Basin that is proposed for residential development as a Greenfield Priority Area – Residential and include the extent of the Plan inside the projected infrastructure boundary. This would allow the area to be considered for an appropriate residential zoning in the Christchurch District Plan, provided that any proposed Greenfield Priority Area meets the objectives and policies of the CRPS. Without amending the CRPS, rural zoning in Cranford Basin would be retained.'*

- b. Section 2.2 should be amended to read:

- 'The draft Plan will seek to:*
- a. *Amend Map A of the CRPS to facilitate residential development in part of the Cranford Basin area. This will include identification of the area proposed for residential development as a Greenfield Priority Area - Residential, amending the projected infrastructure boundary, and, if necessary, amending applicable objectives and policies.'*
2. To ensure that only amendments that are directly necessary to provide for this proposal are considered CRC suggests amending Section 2.2, paragraph c. to read:  
*'Make any complementary consequential amendments to a recovery plan, regeneration plan, relevant strategic document and to other RMA plans if necessary.'*
  3. In Section 3.2 it is stated that: *'A Council initiated Resource Management Act plan change process cannot be notified until after 30 June 2021'*. CRC suggests that a footnote is added to explain why this is so.
  4. The last sentence in Section 3.2 is *'The proponent considers that delaying that opportunity hinders regeneration as defined in the Act'*. CRC suggests this sentence is deleted as it goes substantially further and introduces a different proposition from that of the proposal meeting the purposes of the Act.
  5. Section 4.3 of the draft Outline describes the framework for development of the draft Plan.
    - a. In sub section c. the draft Outline refers to contaminated land, and infers that the potential contamination on the site is due to its historical or present use for market gardens and horticulture. The CRC considers that there may be other sources of contaminants in addition to those related to market gardening and horticulture, and therefore recommends c. is amended to read:  
*'...contaminated land (~~parts of the area were and are used for market gardens and horticulture~~)...*
    - b. The CRC also recommends that in this section a further intention of the draft Plan is added:  
*'k. ensure that any amendment(s) to include an area of Cranford Basin as a Greenfield Priority Area in the Canterbury Regional Policy Statement gives effect to the Canterbury Regional Policy Statement.'*

To achieve this the draft Plan would need to provide an assessment of the proposal against the relevant objectives and policies in the CRPS which include, but are not limited to, the following chapters:

- Chapter 6: Recovery and Rebuilding of Greater Christchurch
- Chapter 11: Natural Hazards
- Chapter 17: Contaminated land
- Chapter 5: Land-Use and Infrastructure (sections that apply to the Entire Region)
- Chapter 7: Fresh water; and
- Chapter 9: Ecosystems and indigenous biodiversity would also be relevant;

Key information required to assess the proposal against the CRPS includes the proposed rezoning; technical assessments based on the areas for development and proposed zonings; and an Outline Development Plan (ODP).



6. On page 9 of the draft Outline the timeframe for developing the draft Cranford Regeneration Plan is February-March 2017, which includes the allowance for 30 working days to seek the views of the section 29(1) parties. The CRC suggests this timeframe is unrealistic. There are only 42 working days in February and March 2017 meaning the draft Cranford Regeneration Plan would need to be received by the section 29(1) parties before 17 February 2017.

The Canterbury Regional Council will continue to work with Christchurch City Council in progressing the Cranford Regeneration Plan, while ensuring that any amendments to relevant RMA instruments give effect to the Canterbury Regional Policy Statement.

Yours sincerely



**Bill Bayfield**  
**Chief Executive**  
**Environment Canterbury**

Cc

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Te Rūnanga o NGĀI TAHU

12 December 2016

Dr Karleen Edwards  
Chief Executive  
Christchurch City Council  
PO Box 73016  
Christchurch 8154

Letter sent by email – [karleen.edwards@ccc.govt.nz](mailto:karleen.edwards@ccc.govt.nz)

Tēnā koe Karleen,

**RE: Response to Draft Outline – Cranford Regeneration**

Thank you for your letter of 28 October 2016 seeking the view of Ngāi Tahu in accordance with Section 29(1) of the Greater Christchurch Regeneration Act 2016 (GCR) on the draft Outline for the Cranford Regeneration Plan (the Plan).

**Please accept this letter as a draft response on behalf of Te Rūnanga o Ngāi Tahu (Te Rūnanga) and Te Ngai Tuahuriri Rūnanga (collectively referred to as Ngāi Tahu in this letter). Time constraints have meant that we are still seeking final approval.**

Te Rūnanga is both a Treaty partner with the Crown and a strategic partner under the GCR with Canterbury Regional Council, Christchurch City Council, Selwyn District Council and Waimakariri District Council.

Section 28 of the GCR states what a draft Outline must contain. It is within this context that Te Rūnanga has considered the draft Outline and provides the following comments:

What the Plan is intended to achieve

- i. We consider that the draft Outline sets out what the Plan is intended to achieve.
- ii. We note the Plan provides for and, where possible, enhances ecological values and Ngāi Tahu cultural values. We seek that this point<sup>1</sup> is reworded to refer to 'Ngāi Tahu' cultural values instead of 'Te Rūnanga o Ngāi Tahu' cultural values.
- iii. We note the Plan provides for stormwater management areas, but we oppose the use of springs, natural wetlands, groundwater seepage areas and waterways being utilised as stormwater treatment and conveyance systems. We seek that this point<sup>2</sup> is reworded to ensure that stormwater treatment and conveyance systems do not utilise existing springs, natural wetlands, groundwater seepage areas and waterways. Please

<sup>1</sup> Dash 2 on page 1 of Draft Outline – Cranford Regeneration Plan dated October 2016

<sup>2</sup> Dash 3 on page 1 of Draft Outline – Cranford Regeneration Plan dated October 2016



note that Ngāi Tahu is supportive of stormwater treatment occurring through 'constructed' wetlands.

Te Ngāi Tūāhuriri Rūnanga has already highlighted the above position and their opposition to stormwater being discharged into Horseshoe Lake which is a wāhi tapu / wāhi taonga in the Cultural Impact Assessment prepared in August 2016 for the Council.

- iv. To ensure the objective of the Plan is achieved, Ngāi Tahu needs to be engaged throughout the development of the Outline Development Plan to ensure the cultural values of Ngāi Tahu are provided for and, where possible enhanced.

#### Proposed scope of the Plan

- i. We seek that Figure 1 of the Plan is amended to identify the land to be considered for residential development and for open space.
- ii. In relation to the aims of the Plan, we seek that point d(ii)<sup>3</sup> is amended. Ngāi Tahu seeks that all springs are protected not just those which are outside of stormwater management areas. In addition, taonga will be identified by Te Ngāi Tūāhuriri Rūnanga not Te Rūnanga o Ngāi Tahu.
- iii. Ngāi Tahu seeks to be engaged during the development of the amendments to the Christchurch District Plan to ensure we can input into the provisions which will recognise site specific effects which need to be managed.

#### Purposes of the GCR Act

- i. We seek that the Plan be amended to provide further explanation on how the well-being and resilience of surrounding urban areas is expected to be improved through the urban renewal and development of Cranford Basin would be beneficial. Ngāi Tahu is currently not convinced that the Plan will improve the culture well-being of the community.
- ii. Ngāi Tahu considers that there is a need to demonstrate that the surrounding urban areas are in need of regeneration.

#### Proposed process for development of the Plan

- i. The Christchurch City Council is to be commended for commissioning a Cultural Impact Assessment for the area. For your reference, we attach a copy of the final Cultural Impact Assessment prepared by Tipa and Associates on behalf of Te Ngai Tuahuriri Runanga dated August 2016.
- ii. We note that in the Cultural Impact Assessment Te Ngai Tuahuriri Runanga raise concerns with the proposed Cranford Basin development and cannot support the development until these concerns are addressed.
- iii. It is unclear how the Outline Development Plan will specifically address the concerns and comments in the Cultural Impact Assessment.

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<sup>3</sup> Page 4 of Draft Outline – Cranford Regeneration Plan dated October 2016



- iv. We request that the values and comments identified in the Cultural Impact Assessment are embedded in the Cranford Regeneration Plan and the Outline Development Plan. For this to occur, it is critical that Ngāi Tahu is engaged throughout the preparation of the Outline Development Plan for inclusion in the Christchurch District Plan. There are multiple opportunities for this proposal to strengthen Ngāi Tahu identity in this area.

Opportunities for public engagement and Timeframes

- i. Ngāi Tahu request the Plan be amended to provide for more explicit opportunities for public involvement in the development of the Plan.

Conclusion

It is requested that:

1. The above comments be addressed fully by the Christchurch City Council.
2. The Christchurch City Council actively works with Te Runanga, Te Ngāi Tūāhuriri Rūnanga and their mandated entity/ies during the on-going development of the Cranford Regeneration Plan and the Outline Development Plan for inclusion in the Christchurch District Plan.

We look forward to working with you in progressing the Cranford Regeneration Plan.

If any of the above is unclear or you wish to discuss any of the matters raised, please do not hesitate to contact us.

Nāhaku noa, nā

Kara Edwards  
General Manager  
Te Rūnanga o Ngāi Tahu

Clare Williams  
Chair  
Te Ngāi Tūāhuriri Rūnanga

