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Draft LTCCP  
Christchurch City Council  
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Dear Sirs

### **CHRISTCHURCH CITY COUNCIL DRAFT TEN YEAR PLAN**

Thank you for the opportunity to make a submission on the Christchurch City Council's Draft Long Term Council Community Plan (2009 – 2019).

Environment Canterbury (ECan) overall agrees with the aims of the Draft Long Term Council Community Plan (2009 – 2019) and the key role it will play in providing a long term focus for the Council's activities. The attached submission, therefore, identifies the specific provisions which ECan supports together with matters where ECan seeks amendment to the Draft Long Term Council Community Plan (2009 – 2019).

Should you require further information please feel free to contact Michael Rachlin on 03 371 7152.

Yours sincerely

Don Rule  
**DIRECTOR, RESOURCE PLANNING & CONSENTS**

**Our Ref:** GOVE/LOC/CCC/COR/2C-1  
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## Canterbury Regional Council's Submission on the Christchurch City Council Draft LTCCP 2009-2019

Please note that this submission follows the format of Volume 1 and will address Strategic Issues followed by the individual areas of Council activities as per the LTCCP.

### Strategic Issues

The Canterbury Regional Council (CRC) endorses the identification of the strategic issues facing the City over the next decade as set out on pages 19-25 in volume 1. These rightly include issues of demand for water and energy, increasing demand for wastewater services, urban growth, transport, investment in infrastructure and protection of the City's natural heritage. The impacts of climate change and the changing demographics of the City's population are also acknowledged and recognised. The CRC, however, considers that management of stormwater will also be a key strategic issue for the City over the next 10 years as a result of continued urban consolidation. The City Council has already recognised this in its work on the Integrated Catchment Management Plan for south-west Christchurch and other projects including the Surface Water Strategy. The importance of stormwater management to Christchurch is also identified in the Greater Christchurch Urban Development Strategy (UDS).

**Submission:** The Canterbury Regional Council overall **supports** the identification of the Strategic Issues facing the City over the next 10 years but would seek the following:-

<p><b>Decision Requested:</b> That stormwater management is identified as a key strategic issue a long side water supply and wastewater. This will align the LTCCP with the UDS and better reflect the Christchurch City Council's commitment to this matter.</p>
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### Water (Conservation and Supply)

**Canterbury Water Management Strategy:** The Canterbury Water Management Strategy (CWMS) is within Environment Canterbury's LTCCP but is a Mayoral Forum initiative funded through a targeted rate across the region and by grants from Central Government. Environment Canterbury submits that your LTCCP refers to the aims of the CWMS and the potential for its implementation to influence your work programmes.

The CWMS will provide an overall approach to water management in Canterbury and is due for completion in October 2009. It will be implemented through statutory processes, LTCCPs and other processes. The goal of the CWMS is "*to gain the greatest cultural, economic, environmental, recreational and social benefits from our water resources within a sustainable framework both now and for future generations*". The strategy will cover environmental flows, water quality, ecosystem protection, management of land-use for water quality protection, allocation, infrastructure and demand management.

The City Council's draft Water Supply Strategy provides a useful link to the Canterbury Water Management Strategy by reflecting a strategic direction for a

sustainable public water supply for Christchurch residents within the wider regional water management context

The CRC agrees that water supply and water conservation are critical matters which contribute to the achievement of a number of the Community Outcomes identified in volume 1 of the LTCCP. It, therefore, supports the Christchurch City Council's proposed significant investment in a water supply growth programme and in Water Supply and Renewal. The supply growth programme will represent key infrastructure necessary to support urban growth and the implementation of the UDS.

These supply side programmes, however, need to be coupled with water conservation measures to manage the growing demand for water. The City Council's Water Supply Strategy including investigations into water metering and volumetric charging will thus be key in achieving the targets the City Council has set for water supply and water conservation. It is important, therefore, that sufficient and timely funding is available for the completion and implementation of the City Council's Water Supply Strategy.

It is also recommended that infrastructure investment programmes are developed for those parts of the City likely to undergo major change either as a result of urban growth or urban intensification.

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Water but would make the following recommendations:-

**Decision Requested:** That sufficient and timely funding is available for the development and implementation of the City Council's Water Supply Strategy consistent with the Canterbury Water Management Strategy.

**Decision Requested:** That water supply infrastructure plans/programmes are in place to guide investment in those parts of the City likely to experience urban growth or urban intensification.

### Wastewater

CRC endorses the considerable investment programme contained in the LTCCP intended to achieve increased reticulation of wastewater within the City together with the ability to meet increased future demand. This includes the investment to upgrade the Bromley Treatment Plant, the inflow/infiltration reduction programme, the western interceptor project and the significant investment in asset renewal. The CRC would, however, request that this investment programme should ensure that funding is available to reduce raw sewage overflows to the Avon & Heathcote Estuary. As it will be aware the Christchurch City Council has applied for consent to extend the timeframe for the necessary upgrade works and to incorporate an additional 13 overflow points. In addition the Regional Council seeks further action to improve wastewater management on Banks Peninsula.

Overall it is important that water quality within the City is protected and improved through these programmes and that investment in infrastructure is provided to deal with urban growth.

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Wastewater but would make the following recommendations:-

**Decision Requested:** That sufficient and timely funding is available for the reticulation upgrade necessary to reduce raw sewage overflows to the Avon & Heathcote Estuary. This will help contribute to the achievement of the Community Outcomes and to meeting the wastewater targets contained on page 75, volume 1.

**Decision Requested:** That further action is taken to improve Banks Peninsula wastewater management. This will help contribute to the achievement of the Community Outcomes and to meeting the wastewater targets contained on page 75, volume 1.

**Decision Requested:** That wastewater infrastructure plans/programmes are in place to guide investment in those parts of the City likely to experience urban growth or urban intensification.

### **Streets and Transport**

Planning for Growth: CRC welcomes the considerable investment the City Council are proposing for transport particularly for the growth of the city. The programme of capital works are consistent with the South West Area Plan and will help to bring forward significant parcels of Greenfield development land in accordance with the UDS and Proposed Change 1 to the RPS.

The CRC is, however, concerned that the timing of the programme of works for the northern access package (the Cranford Street upgrade etc.) may not be aligned with the New Zealand Transport Agency's timetable for the Northern Arterial. Central government funding designed to bring forward strategic roading projects may, as a result, be switched elsewhere and lost to Christchurch. Consequently this could impact on the ability of the Belfast area to provide and accommodate the level of Greenfield development identified in the UDS and Proposed Change 1 to the RPS.

Public Transport: CRC supports the City Council's proposals to implement a number of bus priority routes within the first three years of the plan, together with the early commitments to the construction of the central city bus exchange and three suburban bus exchanges. The CRC would, however, recommend that the following be considered, which will help support the development of PT in Christchurch:-

- Timing of the development of the suburban exchanges could be linked to the improvements in bus priority corridors
- Provision could be made to enable working with suburban mall developers/owners to achieve suburban bus exchanges
- Improvements to the Deans/Riccarton Avenue intersection should be re-instated into the capital programme. Its continued deletion would undermine the successful implementation of the Hornby bus priority route identified for completion in 2010/11.
- Increased investment should be provided for bus shelters. The Metro Users Survey conducted by the CRC identifies bus shelter provisions as needing improvement.
- Completion of Northwood Boulevard to Johns Road should be included in the Capital Works programme since this will enable bus services serving the new development to be available from when residents move in.
- Land use planning should be included as a key tool in the provision and management of PT infrastructure. This would be consistent with the UDS and

Proposed Change 1 to the RPS which identify the importance of integrating land use with transport (Volume 1, page 84).

Notwithstanding the above the CRC is concerned that the mode share target for PT is to remain constant over the lifetime of the plan with no new targets being set to increase this share. This does not reflect the Regional Land Transport Strategy nor the Metro Strategy to which the City Council is signatory. The latter has targets of increasing PT patronage by 5% per year to reach 25 million by 2015. The 'business as usual' approach contained in the draft LTCCP does not reflect the City Council's considerable investment and commitment to PT.

Active Transport: CRC welcomes the proposed investment in new footpaths and for a cycleway improvement programme. It is assumed that this investment includes the City Council's share of the costs of the 'clip-on' cycleways for the Waimakariri Bridge. The Waimakariri District Council draft LTCCP provided for early funding of this project which will help to provide cycling linkages between Bottle Lake, Spencer Park and the Waimakariri River Regional Park.

Given the proposed investment in active transport, CRC is concerned that the mode share target for active transport is proposed to remain constant over the lifetime of the plan with no new targets being set to increase that share. This does not reflect the Regional Land Transport Strategy or the New Zealand Transport Strategy. The 'business as usual' approach contained in the draft LTCCP does not reflect the City Council's considerable investment and commitment to active transport.

Funding and Consistency with the Regional Land Transport Programme (RLTP): There appears to be a number of areas where the figures contained within the draft LTCCP are inconsistent between themselves and also with the figures submitted by the City Council to the RLTP. There also appears to be an under estimation of central government subsidies available through Financial Assistant Rates from the National Land Transport Programme:-

- Volume 1, page 25: In the draft LTCCP \$450m is identified for renewal and replacement of existing roads compared to \$484m in the RLTP.
- Volume 1, page 25: In the draft LTCCP \$162m is identified for PT infrastructure compared to \$174.4m in the RLTP.
- Volume 1, pages 90-91: In the draft LTCCP the cost of capital expenditure for the first 3 years totals \$540.6m. This compares to \$257.7m contained in the draft RLTP which is to be submitted for central government funding.
- Volume 1, pages 33 & 35: The total predicted capital grant is stated as being only 3% which is inconsistent with the draft RLTP
- Volume 2, pages 87, 88 & 90: The financial policies provide for only up to 20% funding from other revenue sources for the road network, active transport and PT programmes.

It is recommended that the City Council review and recalculate the potential for government subsidy from the National Land Transport Programme in line with the draft RLTP. This will help ensure best value from rates, developer contributions and other local funding sources for transport activities in the city.

The Tram: CRC question whether the \$11.5m identified for the extension of the tram should be listed in the Streets & Transport section. This is primarily a tourist attraction and is unlikely to contribute to the transport needs of the city over the next 10 years. Its inclusion in the Streets & Transport section may, therefore, divert funding away from other transport projects.

Other matters: CRC would recommend the following works be included in the capital programme:-

- Upgrades to the Sawyer Arms Road roundabout to facilitate safer vehicle movements to the Waimakariri River Regional Park
- Seal widening to Kainga Road since this will help strengthen cycling linkages between Bottle Lake, Spencer Park, Brooklands and Waimakariri River Regional Park

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Streets & Transport but would make the following recommendations:-

**Decision Requested:** That the programme of works associated with the Northern Access package is reviewed to ensure alignment with NZTA's Northern Arterial programme

**Decision Requested:** To review the spending and investment programmes to ensure consistency between the LTCCP and the RLTP (Volume 1, pages 25, 90-91)

**Decision Requested:** To review and recalculate the potential for government subsidy from the National Land Transport Programme in line with the draft RLTP (Volume 1, pages 33 & 35, and pages 87, 88 & 90)

**Decision Requested:** That the following projects be included within the Capital Programme (Volume 1):

- upgrade to the Deans/Riccarton Avenue intersection to help facilitate the Hornby Priority Bus route
- seal widening to Kainga Road
- upgrade to Sawyers Arms Road roundabout to improve safety
- extension of Northwood Boulevard to Johns Road
- increased investment in bus shelters
- 'clip-on' cycling facilities to the Waimakariri Bridge

**Decision Requested:** That the targets for active transport and PT mode share are increased to better reflect the commitment demonstrated to these non-car modes of transport by the Christchurch City Council and to ensure consistency with the RLTS and the New Zealand Transport Strategy (Volume 1 pages 82 & 84).

**Decision Requested:** That land use planning be included in the section on how PT infrastructure will be delivered and managed (Volume 1, page 84)

**Decision Requested:** That consideration be given to the following to help facilitate PT infrastructure provision:

- Delivery of the suburban bus exchanges be linked to the programme for the bus priority corridors
- Provision be made to enable working with suburban mall developers/owners to achieve suburban bus exchanges

**Decision Requested:** That the role of the Tram extension within the Streets and Transport activities be reconsidered. It is difficult to see how the Tram extension will contribute to the transport needs of the city over the next 10 years

## **Refuse Minimisation and Disposal**

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Refuse Minimisation and Disposal but would make the following recommendations:-

### **Decision Requested:**

- That funds and staff continue to be available for participation in the Canterbury Waste Joint Committee and Canterbury Hazardous Waste Sub-committee
- That adequate funds are made available to enforce the Trade Waste Bylaw 2006. Currently companies using good practise etc. are disadvantaged against other competitors due to the City Council not enforcing these provisions.

## **Parks, Open Spaces and Waterways**

**Stormwater/surface water:** CRC supports the City Council's considerable investment in stormwater management and their commitment to integrated catchment management plans including planning for growth. This is demonstrated in the Capital Programme (Volume 1) for waterways and land drainage growth programme together with the proposed renewals and replacement investment. CRC also endorse the City Council's commitment and considerable investment in surface water strategy actions.

In view of the above the CRC is surprised that stormwater management has not been identified as a key strategic issue for the city or as a key infrastructure along side water supply and wastewater. The UDS identifies the need to upgrade the City's stormwater management system to provide for the urban consolidation anticipated by the Strategy.

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to stormwater management but would make the following recommendations:-

**Decision Requested:** That stormwater management is identified as a key strategic issue a long side water supply and wastewater. This will align the LTCCP with the UDS and better reflect the Christchurch City Council's commitment to this matter.

**Decision Requested:** The CRC looks forward to continuing to work with the City Council on Integrated Catchment Management Plans and to manage the development and implementation of them through the Joint Stormwater Protocol and the Joint Storm Water Issues Management (SWIM) Working Party.

**Decision Requested:** That specific measures be included for measuring achievement of the objectives set out on page 136, Volume 1

**Decision Requested:** That a mitigation method is included to provide for the removal of contaminants from the stormwater network either in situ or at source (page 140, Volume 1).

## **Biodiversity:**

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Biodiversity but would make the following recommendations:-

**Decision Requested:** That provision is made for the continued support of the Regional Biodiversity Strategy and the Regional Biodiversity Co-ordinator

**Decision Requested:** The CRC supports the role of the City Council's Regional Parks to biodiversity and look forward to their continued support and funding of the Coastal Enhancement (Coast Care) work and its contribution to both biodiversity and natural hazard management

### **City Planning & Development**

CRC endorses the proposed activities for City Planning & Development which over the next three years will seek to implement elements of the UDS. It is noted that there will be a particular focus on supporting regional policy and planning processes, central city revitalisation, intensification, Greenfield planning and transport planning. The CRC also supports the proposed annual work programme, to be based on the UDS Action Plan, which gives effect to these activities.

The CRC supports the identification in the draft LTCCP of the importance of reviewing and updating the City Plan through Council initiated Plan Changes, and the role of the City Plan in giving effect to the provisions of the UDS.

Notwithstanding the above, the CRC would identify the importance of proactive initiatives to facilitate development and establish enhanced relationships with the wider development community. The following specific projects could be identified in the City Council's work programmes to give effect to these issues:-

- Establishing an Urban Redevelopment Agency
- Establishing a Developer Forum
- A programme of proactive engagement with Greenfield landowners
- The early introduction of the Plan Changes associated with the L3/L4 zones to facilitate urban intensification

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to City Planning & Development but would make the following recommendations:-

**Decision Requested:** That the following projects be considered for inclusion in the work programmes for City Planning and Development:-

- Establishing an Urban Redevelopment Agency
- Establishing a Developer Forum
- A programme of proactive engagement with Greenfield landowners
- The early introduction of the Plan Changes associated with the L3/L4 zones to facilitate urban intensification

### **Other Matters**

**Energy:** CRC supports the recognition of energy as a strategic issue and the allocation of funding for energy efficiency projects in support of the City Council's Sustainable Energy Strategy. It is noted, however, that the figures do not add up (see Volume 1, pages 218-219 and the table on page 249). In addition CRC notes that no mention is made of the regional council's Household Energy Efficiency Incentives which is being run in partnership with the City Council.

In addition to the above CRC would also make the following observations:-

- Local energy security should be identified as an issue facing the City i.e. ensuring an affordable, secure and reliable local energy system
- Global oil depletion/peak oil should be identified as an issue for both local communities and for the City Council. Local communities and energy user sectors are vulnerable to disruptions in energy services including high prices. The City Council's infrastructure programmes are based on the assumption of continued supply of imported petroleum products. The infrastructure investment programmes should factor in possible disruptions to oil supply etc.

**Submission:** The Canterbury Regional Council overall **supports** the provisions of the LTCCP in relation to Energy but would make the following recommendations:-

**Decision Requested:** That consideration be given to the following matters:-

- The identification of local energy security as an issue facing the City
- The identification of global oil depletion/peak oil as an issue for the local community and the City Council including to possible impacts on infrastructure investment programmes

**Decision Requested:** That the figures contained on pages 218-219, Volume 1 are reviewed against those contained on page 249

**Decision Requested:** That Household Energy Efficiency Incentives scheme be identified in the LTCCP.

Signed



**Don Rule, Director Resource Planning & Consents**

**Dated: 15<sup>th</sup> April 2009**