

JOINT SUBMISSION ON PUBLICLY NOTIFIED DRAFT RURAL RESIDENTIAL STRATEGY

Local Government Act, 2002

To: Selwyn District Council (SDC)
2 Norman Kirk Drive
Rolleston

NAME OF SUBMITTERS: Lincoln University, New Zealand Institute of Plant
and Food Research Ltd, AgResearch Ltd (**the
Organisations**)
(Note address for service below)

SUBMISSION

Lincoln University, the New Zealand Institute of Plant and Food Research Ltd, and AgResearch Ltd have elected to lodge a joint submission on the draft Rural Residential Strategy. This submission focuses primarily upon the potential impact of the draft Rural Residential Strategy on the Organisations' landholdings and operations. All three organisations carry out rural research on research farms, in close proximity to Lincoln, and are interested in ensuring that rural residential development occurs in appropriate locations to avoid reverse sensitivity effects on their operations.

In broad terms, the Organisations are supportive of the Strategy. Some specific amendments to the provisions are required however, to ensure that adequate consideration of reverse sensitivity effects occurs during the planning for, and ultimately establishment of, rural-residential development.

Lincoln University

Lincoln University was established as a School of Agriculture in 1878 and in 1896 offered its first degree. That year it also became the Canterbury Agricultural College, later becoming a college of the University of New Zealand. When the University of New Zealand was dissolved in 1961 the college became Lincoln College, a constituent College of the University of Canterbury. The college was granted autonomous university status in 1990 as part of the major reforms of tertiary education in New Zealand.

Over the past 24 years, the University has continued to develop as a nationally and internationally renowned university specialising in commerce and management, primary production, natural resources, science, engineering and social science.

The University's main facilities are located on its 58 hectare campus in Lincoln and this houses modern teaching spaces, student services, accommodation, recreation, conferencing, consulting and research facilities/activities. The main Campus is zoned Business 3 in the Plan.

In addition to this, the University conducts trials, research and tuition on farms and other sites in the District alongside and away from the main Campus.

The New Zealand Institute of Plant and Food Research Ltd

Plant & Food is a New Zealand-based science company formed in December 2008 through the merger of HortResearch and Crop & Food Research. As a Crown Research Institute, Plant & Food's scientific research is primarily undertaken for the wider benefit of New Zealand. Plant & Food provides research and development that adds value to fruit, vegetable, crop and food products.

Plant & Food have significant assets and operational interests in land within the Greater Christchurch area and the Canterbury Region, particularly in Lincoln where they operate a Research Campus at the Canterbury Agriculture and Science Centre on the north side of Gerald Street within the Business 3 Zone. Plant & Food owns additional landholdings in the Inner Plains, Outer Plains and L2 zones in northern Lincoln.

AgResearch Ltd

AgResearch is a Crown Research Institute (CRI) wholly owned by the New Zealand Government and incorporated in 1992. The Lincoln facility, including nearby research farms, is one of its four campuses throughout New Zealand. The Corporate Office is located on the Ruakura Campus in Hamilton.

AgResearch is an independent research and development company and the Lincoln research facilities focus on biocontrol and biosecurity, land management, plant breeding, seed technology, wool and skin biology and issues facing the textiles sector.

AgResearch's main administration offices, research facilities, laboratories and related buildings are located on the south-east corner of the Springs Road/Gerald Street intersection within the Business 3 zone. AgResearch owns additional landholdings in the Inner Plains and Outer Plains rural areas near the Lincoln Township. These rural sites are essential in providing facilities for research field trials to be undertaken.

THE SPECIFIC PROVISIONS SUBMITTED ON:

The specific provisions of the draft Rural Residential Strategy that the Organisations' submission relates to are as follows:

- Page 27 - "Issues attributed to rural residential forms of development" table in the "Rural Residential context and 'issues' identification" section
- Page 31 - "Benefits of the peri-urban rural residential form" table in the "RRS13 guiding principles and outcomes" section
- Appendix 1 - "Lincoln Environs Study Area Criteria"

NATURE OF SUBMISSIONS:

The Organisations **support the draft Rural Residential Strategy in part.**

The Organisations are generally supportive of the Strategy, which outlines a number of areas suitable for rural residential development in the Greater Christchurch part of Selwyn District.

In particular, the Organisations are supportive of the Strategy insofar as it identifies only one area of land suitable for rural residential development in the Lincoln area, which the Organisations have previously had the opportunity to comment on. The Strategy also recognises the potential for reverse sensitivity effects on rural industry.

The Organisations consider, however, that additions to the Strategy could be made to better recognise the importance of their operations, and the potential for reverse sensitivity effects on these activities.

DETAILS OF SUBMISSIONS:

Introduction

The Organisations are generally supportive of the Strategy, as it clearly outlines where rural residential development will occur, particularly with respect to the Organisations landholdings and operations.

With a research farm in particular, where adjoining land uses are predominantly farming operations, there is generally a higher level of acceptance and tolerance towards typical research related activities and associated environmental effects. Where the adjoining area becomes a rural residential or residential area, the level of acceptance and tolerance towards such activities can reduce significantly and they can be impacted by reverse sensitivity effects.

This section outlines the planning context, and the specific comments the Organisations have on elements of the Strategy, with a view to ensuring that reverse sensitivity effects on tertiary education and research activities are clearly articulated within the document.

Planning Context

A number of Regional and District planning documents have noted the importance of tertiary education and research activities. For example, the Greater Christchurch Urban Development Strategy & Action Plan 2007 ("UDS") states the following:

- *"National and regional assets will be protected including...the agricultural research centres and farms as these are essential infrastructure."*
- *"Greater Christchurch also contains a number and range of research centres and agricultural research farms located in close proximity to each other that are of strategic importance from a local and national perspective. Their retention and continued operation is of importance to the regional economy."*

Further, the UDS outlines several 'Key Approaches' which include the need to:

- *"Manage adverse effects on strategic nationally and regionally important research centres and farms."*

While the UDS is not in itself a statutory document under the Resource Management Act 1991 (RMA), it is a broad scale, long-term, land-use strategy prepared under the Local Government Act 2002, which is intended to guide the future development of Greater Christchurch, and to be implemented through statutory documents.

Statutory backing to the UDS is provided through the Land Use Recovery Plan gazetted in December 2013, which makes amendments to the Canterbury Regional Policy Statement (RPS). The Strategy has been prepared as directed by this document and with respect to the Organisation's submission, the following provisions are noted (emphasis added):

Issue 6.1.5 – Rural residential impacts

Rural residential development, if unconstrained, has the potential to change the character of rural areas and to create adverse effects on established rural, farming (including

agricultural research farms) and quarrying activities through reverse sensitivity. It also can result in dispersed settlement patterns, and inefficient forms of development and provision of services.

Policy 6.3.9 – Rural residential development

In Greater Christchurch, rural residential development further to areas already zoned in district plans as at 1st January 2013 can only be provided for by territorial authorities in accordance with an adopted rural residential development strategy prepared in accordance with the Local Government Act 2002, subject to the following:

...

(g) avoid significant reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure;

...

The Organisations have also made similar submissions on SDC's Plan Change 32, and previous rural residential plan changes, seeking to recognise reverse sensitivity effects arising from inappropriately located rural residential development.

It is within this context that the Organisations continue to address the importance of ensuring rural residential development proposals adequately recognise reverse sensitivity effects on their facilities, and it is considered that parts of the Strategy could be enhanced to better ensure these effects are taken into account.

Rural Residential Strategy Provisions

As set out in the sections above, the Organisations generally support the Strategy and seek the following amendments to the document to ensure reverse sensitivity effects on their operations are taken into account. Suggested amendments are set out in **bold and underline**. The rationale for seeking the amendments is also provided below.

- **Submission Point 1**

Page 27 - "Issues attributed to rural residential forms of development" table in the "Rural Residential context and 'issues' identification" section

The Organisations seek the inclusion of the term "*Tertiary Education and Research Activities*" in the bullet point which discusses reverse sensitivity effects where new residents establish adjacent to farming, rural industry or strategic infrastructure.

Suggested amendments:

"there is an increased risk of adverse reverse sensitivity effects where new residents to an area are less aware of farming, rural industry, **tertiary education and research activities**, or strategic infrastructure, which can lead to complaints and amenity conflicts that may undermine the viability of legitimately established land uses"

Reason:

The RPS recognises reverse sensitivity effects on agricultural research farms as an important urban growth issue, and it is therefore considered important that the Strategy also identifies these effects as an issue to consider in the development of land for rural residential purposes. Within the context of the Organisations' submissions, there is a strong link between the research and tertiary education activities. These terms have been suggested as the Selwyn District Plan already defines the terms "research" and "tertiary education", and therefore any adoption of the Strategy recommendations into the District Plan will have consistent terminology.

- **Submission Point 2**

Page 31 – “Benefits of the peri-urban rural residential form” table in the “RRS13 guiding principles and outcomes” section

The Organisations seek the inclusion of the term “*Tertiary Education and Research Activities*” in the bullet point which discusses rural residential form which avoids reverse sensitivity effects with productive rural land uses and strategic infrastructure.

Suggested amendments:

“typologies that are consolidated and integrated with settlements are better able to avoid ‘ribbon’ development, adverse reverse sensitivity effects with productive rural land uses, tertiary education and research activities and strategic infrastructure and to assist in achieving compact urban forms for existing residential settlements.”

Reason:

The RPS directs that rural residential growth occurs in a manner which does not give rise to significant reverse sensitivity effects on agricultural research farms, and it is therefore considered important that the Strategy also recognises the benefits of appropriately located peri-urban form with respect to avoiding these effects. As stated above, these terms have been suggested as the Selwyn District Plan already defines the terms “research” and “tertiary education”, and therefore any adoption of the Strategy recommendations into the District Plan will have consistent terminology.

- **Submission Point 3**

Appendix 1 – “Lincoln Environs Study Area Criteria”

The Organisations seek the inclusion of criteria under the “Urban Form and Growth Management” section which recognises the importance of avoiding reverse sensitivity effects on *Tertiary Education and Research Activities*”.

Suggested additional criteria:

“Avoid locations which may result in reverse sensitivity effects on tertiary education and research activities”

Reason:

The RPS directs that rural residential growth occurs in a manner which does not give rise to significant reverse sensitivity effects on agricultural research farms. It is therefore considered important that the Strategy requires avoidance of locations in the Lincoln area which, if developed for rural residential purposes may result in reverse sensitivity effect on the Organisations. The inclusion of criteria which specifically require consideration of these effects in the Lincoln context would safeguard the Organisations in the event any additional parcels of land are included in the Strategy through the public consultation process.

General Considerations

The Organisations also seek that Selwyn District Council does not identify any further areas as suitable for rural residential development in the Lincoln area, particularly to the west of the township, without first consulting with the Organisations to determine whether any reverse sensitivity effects may arise.

Summary

The Organisations are generally supportive of the draft Rural Residential Strategy, particularly that it will give certainty around the location of rural residential development in the District for the foreseeable future. The Organisations seek specific amendments to ensure that reverse sensitivity effects on their landholdings and operations are recognised, and provided for, when private plan changes are considered by the Council to rezone land for rural residential development.

HEARING

The Organisations wish to be heard in support of their submission.

Submission signed for and on behalf of **Lincoln University, the New Zealand Institute of Plant and Food Research Ltd and AgResearch Ltd:**



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Director
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Dated: 3 March 2014

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