

BEFORE THE SELWYN DISTRICT COUNCIL

Under the Resource Management Act 1991

In the matter of Proposed Plan Change 72 to the Operative Selwyn
District Plan: Prebbleton

And Trices Road Rezoning Group (The Applicant)

SUMMARY OF EVIDENCE OF CARL ALEXANDER FOX

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SUMMARY OF EVIDENCE OF CARL ALEXANDER FOX

INTRODUCTION

- 1 My full name is Carl Alexander Fox. My qualifications and experience are set out in my brief of evidence dated 24 January 2022.
- 2 I have been involved in various stages of PC72 and am familiar with the site characteristics.

KEY POINTS OUTLINED IN EVIDENCE

Infrastructure and servicing

- 3 My evidence confirms that there is sufficient capacity available in the Council networks for water supply, wastewater, and sufficient capacity in the service suppliers' networks for electric power and telecommunications.
- 4 With regards to wastewater, the PC72 site can be serviced by the existing Council wastewater network. Council has confirmed that capacity upgrades are currently underway and additional upgrades are planned and budgeted for in the Council Long Term Plan (wastewater treatment) and that there is capacity within the Prebbleton pump station to accept flows from PC72 (wastewater conveyance).
- 5 An area has been set aside for treatment and attenuation of stormwater from the PC72 site which is practical and compliant with Regional Council requirements. Further detailed modelling and ground testing will be required to refine the design which ultimately might see the stormwater management area reduce or split into multiple areas if the soils are more permeable than allowed for.
- 6 The Outline Development Plan has been adjusted to incorporate suggestions regarding roading layout and cyclist/pedestrian connectivity resulting from recommendations contained in the Section 42A Report but fundamentally the structure of the rezoning proposal remains the same.
- 7 In summary, already planned infrastructure upgrades or new infrastructure constructed as part of the development of the site can provide for its infrastructure needs. There are no physical or capacity constraints which would impede development of the site.

Site density

- 8 My evidence traverses the various densities that may be possible for the PC72 site and concludes that 12/hh/ha strikes a good balance between increased urban density, street character, urban form and function in context of this environment. This matter is also addressed in the evidence of Ms Lauenstein.

AREAS OF AGREEMENT AND DISAGREEMENT WITH OTHER TECHNICAL EXPERTS

Response to evidence of Mr Stewart Fletcher

- 9 In Paragraph 5.2 Mr Fletcher provides aerial imagery confirming that what is now a shallow depression on the Drinnan land was historically a clearly defined ditch or drainage channel. I therefore believe it is not an overstatement of its 'size, form and function'.
- 10 The evidence of Mr Blakie discusses the proposed stormwater outfall(s); however, I note that water will always find its way to the lowest point and based on contour information I have reviewed it is clear that the 'indentation' referred to by Mr Fletcher is the lowest point of the surrounding area and is a natural flow path for overland flow. This confirms my observations on-the-ground when I visited the Drinnan property in late 2020.

Response to evidence of Mr Langman

- 11 Mr Langman is concerned that several other plan changes progressing through Council may place additional pressure on the Council networks and that this should be accounted for in considering whether PC72 can be adequately serviced. In my experience, the standard infrastructure practice is to allocate connections to development applications as they are made i.e., on a first come first served basis. If there is insufficient capacity, then a proposed development can only proceed once capacity is made available whether that be through Council or Developer led upgrades or modifications.
- 12 Further, I note that the Council business aim must be for full utilisation of their infrastructure. The holding costs of under-utilisation of assets is expensive. Upgrades to infrastructure networks are triggered by demand and it is not realistic to suggest that 'headroom' capacity ought to be available for a development to be approved. In any event, this is not a question for PC72 where capacity within existing networks is confirmed.
- 13 With respect to Mr Langman's comment that:

*"approving PC72 could potentially undermine timely delivery of other land already identified for planned urban development within the PIB [projected infrastructure boundary] (and the FDAs [future development areas])"*¹

I note that while specific allocation of capacity based on identified development potential sounds like an efficient way of managing resources, like any plan it will be disrupted by unforeseen circumstances. Just because land is zoned for development does not mean that the land will be developed immediately with some owners not developing for decades. It is important that decisions on available capacity are flexible to ensure that Councils are not

¹ Statement of Evidence of Marcus Hayden Langman on behalf of the Canterbury Regional Council and Christchurch City Council, 21 January 2022 at [126]

required to carry the cost of infrastructure without the anticipated return through development contributions or rates.

CONCLUSION

- 14 Overall, I remain of the view that practical and economic engineering solutions are available to provide the required infrastructure and to mitigate the potential impact of urban development, and that the proposed plan change can be supported from an infrastructure perspective.
- 15 I am happy to answer any questions concerning my evidence or the proposed conditions

31 January 2022

Carl Fox