

BEFORE THE SELWYN DISTRICT COUNCIL

IN THE MATTER of the Local Government Act 2002

AND

IN THE MATTER of a submission by Pinedale
Enterprises and Kintyre Pacific
Holdings on the draft Rural
Residential Strategy 2013

BRIEF OF EVIDENCE OF FIONA ASTON

9 APRIL 2014

QUALIFICATIONS AND EXPERIENCE

1. My name is Pauline Fiona Aston (MA Cambridge University, England, M.Phil Town Planning, University College London, MNZPI, MRMLA). I have 30 years resource management and planning experience. I am Principal of Fiona Aston Consultancy Ltd, and have operated my own consultancy practice since 1995. Much of my work is in the field of land subdivision and development, predominately in Canterbury. I am very familiar with Selwyn District, both as a previous resident and due to my ongoing projects in the District.
2. My office prepared the submission on the SDC Rural Residential Strategy ('RRS') on behalf of Pinedale Enterprises and Kintyre Pacific Holdings (hereafter referred to as Pinedale).
3. I am currently/have recently worked on a range of rural residential proposals, in both Selwyn and Waimakariri Districts. This includes:-
 - SDC Plan Change 28 (rural residential rezoning for 110 lots at west Lincoln on behalf of Denwoods Trustee). The PC has been notified and submissions and further submissions have been received. It is currently on hold pending the hearing of submissions on the RRS. It is identified as Preliminary Area 4 in the RRS:
 - SDC Plan Change 27 (rural residential zoning for 36 lots at east Rolleston on behalf of the Coles Family Trust). The plan change has been finalised and reviewed by SDC officers but not yet formally considered for notified. It is on hold pending the hearing of submissions on the RRS. It is identified as Preliminary 1 in the RRS..
 - Waimak DC Plan Change 21 (rural residential rezoning for 55 lots at Ohoka). The Plan Change has recently been recommended for approval by the Commissioners and is due to be made operative (there are no appeals).
 - Appeal on behalf of R & S Black seeking inclusion in the Mandeville Growth Management Area as prescribed in Waimak DC Plan Change 32. This will enable the Blacks to apply for rezoning of the 4 ha site as a minor extension of the Ohoka Meadows Residential 4B (rural residential) zone at Mandeville. The Environment Court decision is pending.
 - Submissions on the Waimakariri Rural Residential Development Plan (2010) seeking identification of various sites for rural residential purposes at north west Rangiora, Waikuku, Kaiāpoi and Ohoka.
 - Submissions seeking inclusion of the following as rural residential sites in the SDC Rural Residential Strategy:-
 - Lincoln (Denwoods Trustees, Apton Developments, Bruce Harrington, Barker)

- Rolleston (Coles Family Trust, Pinedale Enterprises and Kintyre Pacific Holdings)
 - West Melton (Austins)
 - Prebbleton (Trent Road Developments, Conifer Grove, Pandora Trust, Crabbe Partnership)
 - Tai Tapu (Crofts & Williams)
4. I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise.
5. The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions.
6. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

BACKGROUND

7. The Site is currently use for a dairy 'run off' block in winter, and for cattle grazing and some hay production in summer. It does not have irrigation consent, and is in the over allocated area in the relevant regional policy so it is extremely unlikely that consent to take water for irrigation purposes would be granted for the site. Even though a relatively large site for a peri-urban location, held in several titles, it is not an economic unit and comprises light stoney soils of low versatility and with limited productive farming potential.
8. The submitters have previously sought to develop the Site for urban residential purposes to provide for affordable residential housing for earthquake recovery housing needs. They responded to the Minister of Earthquake Recovery's request in 2012 for landowners to provide him with details of land available for urban development post the earthquakes. A proposal for 700 residential sections for the re-location of red zoned housing was provided to the Minister, based on a 'clustered' urban design design concept prepared by James Lundy, an urban designer whose work has included social housing designs for Christchurch City Council and Housing New Zealand. A meeting was held with staff at the office of Roger Sutton, but as was typical of most responses made to the request for housing proposals, no formal feedback was received from the Canterbury Earthquake Recovery Authority (CERA).

THE SITE

9. The Site comprises a total of 67.94 ha. It covers most of the land in the block bounded by Two Chain Road, Walkers Road and Railway Road. There are two existing dwellings on the Site, on Lot 14 (32 ha) and Lot 6 DP 33996. Excluded from the submission request for RR status are two lots at the eastern end (used for grazing) and two middle position blocks currently used for horse training and grazing, and the land at the north west corner (8ha) which adjoins the Rolleston Prison site. This land includes a pine woodlot along the Walkers Road frontage which provides appropriate visual and physical separation from Rolleston Prison. The Prison is for medium security prisoners, not high security.
10. The Site is directly opposite the Rolleston Township located on the southern side of SH1, with Dunns Crossing Road joining intersecting with SH1 at the same point as Walkers Road, and forming the western limit of the urban area (with the PC8 approved Holmes rural residential block beyond this). It is separated from Rolleston Izone area to the north east by existing predominantly 4 ha blocks on the north side of Two Chain Road, and the Armack Drive existing rural residential area between Wards Road and Railway Road. Rolleston Prison is located on land to the west on the opposite side of Walkers Road. The South Island Main Trunk Line Railway runs parallel with the southern boundary of the Site. There is an approximately 30m wide strip between the SH and southern site boundary containing the railway line, and then a further 40m wide strip owned by the submitter between the railway line and fenced paddock land.

PLANNING STATUS

11. The Site is zoned Rural Inner Plains. It adjoins but is outside the area covered by the Rolleston Structure Plan (RSP). The SH1 frontage is shown as to be enhanced with avenue planting and the western gateway to the township is shown in a midway position between Walkers Road and the western extent of Izone where it 'meets' SH1 (see RSP plan attached).
12. Land on the opposite southern side of the Site is all within the Rolleston urban area. It is shown on the RSP as existing urban areas and an area of medium density housing with a local centre. I understand that residential development of this area is well underway.

RURAL RESIDENTIAL DEVELOPMENT CONCEPT

13. A preliminary rural residential design concept for the Site has been outlined and discussed in detail by Ms Lauenstein. She proposes a well defined rural residential

enclave which contains 3 small clusters of dwellings and which has strong buffers towards Two Chain Road and the railwayline as well as uses the excluded western and eastern lots as buffers towards Izone and Rolleston Prison. The dwellings in each cluster are grouped together around an access lane minimising the need for individual access points to be formed along Two Chain Road. Clustering also makes servicing of lots more efficient and leaves large open spaces between clusters to enable views to the Southern Alps as well as providing a rural character that is distinctly different from the urban environment to the south and different to the surrounding rural character. The design provides for around 46 rural residential lots in total at an average density of around 1 ha per dwelling. Ms Lauenstein considers that a lower density rural residential environment with lots sizes around the 1 ha size is more appropriate in this particular location. Generous landscaping is proposed along the Two Chain and Walkers Road frontage to retain a rural outlook from these roads, rather than the impression of 'domestication'. The existing substantial ^{planting} along the southern boundary with the railway line is to be retained and extended. This will form part of a continuous 'green link' from Walkers Road to the eastern end of the Site, from where it can connect either to Two Chain Road or Railway Road via land adjoining the railway line, providing an off road pedestrian and cycleway route, in addition to the route proposed within the very wide road berm along the south side of Two Chain Road.

ASSESSMENT AGAINST RELEVANT PLANNING DOCUMENTS

DRAFT RURAL RESIDENTIAL STRATEGY

Preliminary Area Pre-requisites

14. The Draft Rural Residential Strategy identifies five preliminary sites which generally meet the criteria for Rural Residential Development in the Selwyn District. At paragraph 6.2 the following pre-requisites for consideration are set out:

- can be economically serviced with reticulated water and wastewater services
- is able to be integrated with established Townships
- does not significantly undermine the urban consolidation and intensification principles of the LURP, Chapter 6 of the CRPS, SDP or RRS13
- is not affected by any significant constraints
- is owned by parties who have aspirations to rezone the land

15. The Site meets all of these pre-requisites, for the reasons set out below (and as outlined in the submission).

Reticulated services

16. In this case the Site, reticulated services are already available in Two Chain Road and can easily be extended down Walkers Road. The Site is very close to the Rolleston wastewater treatment plant. Rolleston Prison, which is fully reticulated is located opposite the Site, on the west side of Walkers Road.

Integration/consolidation

17. The location of the Site adjoins the Rolleston existing township and LZ to the south, and is close to Izone industrial area to north east. It is readily accessible to the existing township. The Rolleston Structure Plan (RSP) includes provision for a localised grade separated pedestrian/cycle crossing connecting Izone, Southern Business Hub with the town centre over the State Highway and Railway line. This will connect George Holmes Road and Tennyson Street. The RSP states:-

The overbridge will link to the planned cycle routes providing north/south access across the town. The overbridge will provide safe access across the state highway and railway line from the rural residential areas to the north of Rolleston to the schools and amenities within the town. The overbridge provides an opportunity to create an iconic structure that land marks Rolleston on the State Highway which can be used to link the design elements of the 'Park n Ride' facility and Izone. A along the boundary of the Living Z zone ensures that it is able to be integrated with Rolleston, and appropriate future road, cycle and pedestrian linkages will be able to be cohesively provided.

18. Ms Lauenstein has also addressed connectivity issues in her evidence. This is further discussed below under my comments on the Officers Report. In essence, the Site location provides excellent connectivity to Izone, with the Council proposed improvements including as outlined above, ensuring that connectivity between Izone and the rest of the township will continue to improve over time.

Constraints

19. The Site is relatively flat and not located in a high ground water zone, any flooding zones, or any identified liquefaction zones. The Site does not contain any historic heritage, protected tree sites, or identified cultural heritage sites (ie silent file areas).

There is no known contamination on the Site, nor any known historical activities which might have created contaminated land (although a Preliminary Site investigation will be required to be undertaken in conjunction with any future development of the Site).

20. Preliminary development concepts for the Site include a noise and landscape buffer along the southern boundary with the railway line, and beyond this SH1. The site legal boundary is set back 30m from SH1, with a further 40m to the existing fenced paddocks. There is ample space to provide appropriate dwelling setbacks and landscaped buffers which more than meet the requirements of a 40m dwelling setback in accordance with NZ Transport Agency standards.
21. Having regard to the above, there are no known constraints to developing the Site.

Landowner intentions

22. It is the intention of the submitter to develop this Site for rural residential proposes.

RRS Location Criteria

23. An assessment of the Site against the RRS location criteria is attached to the submission. All criteria can be met, other than, depending on the interpretation of 'residential development', the District Plan policy of avoiding rezoning land for new residential or business development (other than Business 2 and 2A Zoning), west of SH1 and the South Island Main Trunk Line (SIMTL) (Policy B3.4.71).¹ Rural residential will be a low density residential zoning, and can achieve appropriate connectivity with the other residential and service areas of the township and thus is appropriately located even though on the north side of the township.
24. Related to the above matter, is the criteria '*Preclude rural residential development north of SH1 and SIMTL that would be severed from Rolleston and contribute to poor integration and connectivity with the Township.*' Ms Lauenstein's evidence establishes that although located north of SH1 and railway, this rural residential node can achieve good connectivity with the residential and service areas of the township. The criteria only precludes development that does not achieve appropriate connectivity and integration, not rural residential north of the SH1 and railway line under any circumstances.

¹ To be considered under Rolleston criteria 'urban form and growth management'

25. In my opinion, the situation in Rolleston is quite different to that of other smaller townships which are 'split' by a SH, for example West Melton. Here there is a major industrial zone on the opposite side of the SH which provides significant local employment opportunities. Council has specific plans to achieve good connectivity for pedestrians and cyclists between both sides of the SH, including an overbridge, and appropriate traffic management measures, to ensure that safe connectivity can be achieved. I am aware that there is considerable 'interaction' between Izone and the existing Rolleston township south of the SH both for employment and related service activities, for example a very popular café enjoyed by Rolleston residents located with Izone.
26. The planned growth at Rolleston, which will become a substantial town is such that physical structures, including the overbridge, and roading re-designs which will facilitate connectivity between the parts of the township on opposite sides of the SH, are feasible and viable, which is not likely to be case for smaller townships.
27. The criteria under 'Landscape values' includes *"manage the amount of households within single locations to avoid the collective visual effects of intensified land use"*. The Site can theoretically accommodate up to around 55 rural residential households based on an average lot size of 1 ha². Ms Lauenstein's concept is for a slightly lower yield of around 4⁶ ha, due to the inclusion of generous open areas within the development, retention of significant planting at the southern end, and along the external road frontages. If the two 'midposition' blocks were included in the RRS area, this could increase the site size to around 76 ha, with a theoretical yield of up to 62 rural residential lots. I do not consider the two 4 ha blocks at the eastern end of the Site should be included as they provide a 'buffer' to the industrial land and Izone adjoining this boundary. Neither should the 8 ha property at the western edge to included as this provides a visual buffer and separaton from Rolleston Prison.
28. I do not consider it is necessary for the 'mid position' blocks to be included. These can serve to divide the rural residential development into two distinct areas. Equally, if they were to be included, the ODP² would ensure an overall design that achieved a rural residential character consistent with that sought in the RRS. The size of the RR 'node' in this case is 'dictated' by the location of the overall block bounded by Two Chain Road, Walkers Road SH1 and Izone 'sandwiched' between the existing Rolleston township to the south and existing rural lifestyle and rural residential blocks on the north, and Izone beyond this.

² Assuming the developable area is around 55 ha, which excludes 18% of the land required for roading and possible stormwater management.

29. I consider the Site an appropriate sized rural residential 'node' for this location given the ultimate size intended for Rolleston and the high rate of growth of the township; and because Rolleston is a Key Activity Centre intended to be self sustaining and become a substantial town over time. There are no other areas of rural residential development north of Rolleston (apart from a small existing informal area, not zoned near Izone – Armack Drive).
30. I note that the existing two zoned rural residential locations at east Rolleston (PC 8 & 9, known as the Holmes and Skellerup blocks) are not available for rural residential purposes at this time with no likelihood of this in the foreseeable future. I understand they have been purchased by an adjoining dairy farmer and are being used for dairying.
31. I note that the 'theoretical' maximum yield of 55 rural residential lots is unlikely in any case. Ms Lauenstein's design concept provides for approximately 46 lots. This will form the basis for the ODP to be developed as part of the subsequent plan change process.

Amendments to RRS

32. Whilst a non-statutory document produced under the Local Government Act, the RRS in effect has the 'weight of statute' because under Chapter 6 of the RPS, future rural residential areas can only be provided for if in accordance with an approved RRS.
33. Unlike District Plans, there is no ability to seek changes to the RRS. It is therefore essential and necessary that the provisions of the RRS are regularly reviewed and updated.
34. There is a requirement for the uptake of rural residential land to be monitored under Policy 6.3.11 (2) of Chapter 6 of the CRPS, namely "*undertake monitoring of the supply, uptake and impacts of rural residential land use and development.*" An additional section should be added to the RRS 'Monitoring and Review' which refers to the CRPS monitoring and review requirement and states that the RRS will be reviewed regularly to reflect the findings of this work (or similar such wording).
35. I note the officers report supports this amendment which has been requested by a number of submitters. Mr Craig suggests monitoring include when land identified in

the RRS is zoned, subdivided and building permits issues, so that uptake can be quantified and the need for additional land established.³ With respect, I do not consider the relationship between land uptake and need for land for rural residential purposes is as straight forward as this. There can be a host of reasons why land identified for RR purposes is not rezoned and/or developed in the short term. Notwithstanding that one of the RRS 'pre-requisites' is that landowners have aspirations to rezone the land. Councils clearly cannot 'force' this to happen. There needs to be a reasonable choice of RR options, to ensure a reasonable supply of RR sections to the market, taking into account the variable intentions and timeframes of landowners. These can have a very significant effect on actual supply when the absolute 'number' is small, as has happened with PC 8&9, which too up 75% of the allocation of 200 lots for the 2009-2017 period under the provisions of Chapter 12 A of the RPS (replaced by C6).

LAND USE RECOVERY PLAN

36. The Land Use Recovery Plan sets out (page 25) that limited rural residential development will be provided for to allow a range of choices of housing types for those needing to relocate, but without creating an inefficient use of land or infrastructure, and to protect future urban expansion, and avoid reverse sensitivity effects with rural land.
37. In my opinion, rural residential development of the Site is an efficient use of land and infrastructure which does not limit future urban growth. The future urban growth path for Rolleston is south, to Selwyn Road, as shown in the RSP. Urban residential growth in the direction of the Site is not favoured either by SDC or the Canterbury Earthquake Recovery Authority.
38. The Site may have potential for industrial development, particularly as it has frontage to the South Island Main Island Trunk Railway Line, adjoins SH1 and due to its close proximity to Izone. However, the Site is not part of the future Izone expansion, to the northeast.
39. The submitters approached Douglas Marshall (SDC Corporate Services Manager) ahead of this hearing to ascertain whether the Council may be interested in the land as part of the growing 'industrial' hub on the north side of Rolleston. The response

³ Paragraph 3.244

was that they 'may be interested' in the railway siding area only, but with no further comment or interest in considering the matter further. The submitters have no interest in selling just the railway siding land to SDC. SDC's approach to date has been to acquire land blocks of farmland for expansion of Izone, thus dealing with just one landowner at a time and obtaining suitable large regular shaped blocks with relative ease.

40. If the Site was developed for industrial purposes, this would leave existing 4 ha rural lifestyle properties and the Armack Drive rural residential area 'sandwiched' between two industrial areas.
41. Due to the provisions of Chapter 6 of the Regional Policy Statement (C6) it is no longer possible to apply for private plan change requests for rezoning land for urban purposes. This would be inconsistent with C6 which only provides for urban activities in priority greenfield areas or existing urban areas as defined in C6. C6 cannot be changed by way of private plan change requests.
42. Unless SDC makes a request to ECAN to rezone the Site for business purposes, there is no ability for the submitters to pursue this option. In any case, they do not consider industrial zoning is appropriate, unless it is on the basis that the Council purchase the entire block bounded by Two Chain Road, Walkers Road, the railway/SH1 and Railway Road and develop it as and when required as part of their overall development and management plan for Izone. There is more than ample supply of industrial land at Izone and west Christchurch and it would not be an economic proposition for the submitters to develop and service the land for industrial purposes. They have concluded that this is not a viable option and thus the only available option other than the status quo (uneconomic farming) is rural residential development. This has real merit, providing for a land use which is consistent with the existing rural lifestyle (4ha) and rural residential (Armack Drive) development north of Chain Road.
43. In terms of the other LURP reasons for limiting rural residential development, I note that development of the Site for rural residential purposes will not create adverse effects with surrounding rural land, given that adjoining land is either SH1 and LZ/existing township (to south) and low intensity rural lifestyle purposes (north and east) and Rolleston Prison to the west but with an appropriate buffer provided by

exclusion of the existing 8ha lot in the south east corner of the Walkers Road/Two Chain Road/Dunns Crossing Road intersection.

44. The LURP states that limited provision is to be made for rural residential development, but this is not further quantified. The Explanation for Policy 6.3.9 notes that *"rural residential development can impact on transport efficiency, and the maintenance of rural character and rural land use for production.."* and that *"more limited provision would undermine the achievement of recovery."* These concerns appear to be the reasons for making 'limited provision' whilst recognising the *"desirability of providing a range of choice in housing types for those needing to relocate, without compromising the overall intent of consolidation in the CRPS."*
45. Making provision for rural residential in peri-urban locations is most efficient in terms of transport efficiency, due to proximity to urban services. The design concept is for a yield of around 46 rural residential lots. This is not substantial in the context of the intended future size of Rolleston, of a population of around 50 000. This is a logical use for land which is in such close proximity, and can be integrated with the township and Izone industrial area.
46. I note that the RRS recognises that Rolleston *"has capacity to support an increased population base within rural residential environments as it is identified as a Key Activity Centre that has the community infrastructure, services and business areas to support a large self sustaining community."*⁴
47. The Draft RRS only makes provision for a total of 207 rural residential lots in addition to the approved rural residential plan changes at west Rolleston (PC 8 & 9) which together provide for 148 lots i.e. a total of 355 lots. This is a very small provision, especially in relation to the amount of urban growth anticipated over the 10-15 years (the LURP makes provision for a total of 6300 households in the period to 2028 in SD); and the findings of the Ford Baker Valuation report (August 2010) referred to the Rural Residential Background Report. regarding anticipated demand for rural residential lots. The report found that over the last five years there have been an average of 66 rural residential lot sales in SD (in the 0.3 – 2ha size range) and estimated that the market can sustain 120 rural residential lot sales per annum over

⁴ Rolleston Environs Study Area Criteria Appendix 1

the 35 year period 2007-2041, a total of 3600 lots between 2011-2041; or 1680 between 2014-2028.

48. In comparison, the adopted Waimakariri Rural Residential Development Plan makes provision for 1045 rural residential households and notes additional rural residential households are likely to be provided for at Tuahiwi as part of strategic planning work underway for this area.
49. In both Waimakariri and Selwyn Districts it is understood that there is a currently a very limited supply of rural residential lots on the market (in SDC PC8&9 land has been purchased by parties with no interest in rural residential subdivision at this time, as acknowledged in the RRS).
50. In light of all of the above, it is considered that additional areas for rural residential development should be added to those identified in the Draft RRS, including the Site.
51. In my opinion, the starting point for determining what sites should be identified as RR sites should be a consideration of how the peri-urban environment around each township is to best managed, what it should ultimately look like and where RR development 'fits' within this context. The RRS location criteria are a very helpful guide, but what is missing is the kind of urban design analysis for each township that has been undertaken by Ms Lauenstein.

OFFICERS REPORT

52. The officers Report opposes the inclusion of the Site (paragraph 3.123) for the following reasons:
 - The Site may contribute to ribbon development along SH1 as far as Dunns Crossing Road (southern gateway for Rolleston).
 - Reverse sensitivity effects may be generated with strategic infrastructure including SH1, the South Island Main Trunk Line (SIMTL), I-Zone business park and Rolleston Prison.
 - The Site is severed from Rolleston by SH1, which is a barrier to achieving an integrated and well-connected rural residential node. Additional residents using the Rolleston Drive or Dunns Crossing Road connections into the township are likely to reduce the safety and efficiency of SH1.

- The Site would be inconsistent with several of the locations criteria including the potential to adversely affect strategic infrastructure and fails to adjoin residential priority areas or living zoned land.
- Concern with reverse sensitivity effects arising with the Ports of Lyttleton and Tauranga proposals to have inland ports with rail way sidings and roading connections either through or in close proximity to the Site.
- The Assets Manager notes that there is limited wastewater infrastructure in place, with an upgraded sewer line and pumping station being required if included.
- The Council officer considers that there is sufficient land proposed to be zoned L3 with better alignment to the RRS criteria within the 5 year' proposed monitoring and review period.

53. In response, I note the following:-

Ribbon development/poor connectivity and integration with township, in comparison to alternative locations

54. These matters have been addressed by Ms Lauenstein. RR development of the Site will not contribute to ribbon development along SH1 as it is directly opposite the urban zoned parts of Rolleston on the south side of the SH ie. it is 'filling in' a gap in the concentric urban form of township as a whole, which includes Izone. Further, there is existing substantial screen planting along the SH frontage between the SH and the railway and further substantial planting along the southern boundary of the Site. This will be retained and strengthened with additional planting. There will be a substantial setback for dwellings from the southern site boundary, and they will be in three clusters rather than 'continuous'. In all probability the rural residential will be barely, if at all, visible from the SH1.
55. Ms Lauenstein considers that the Site is not suitable for urban residential development due to connectivity issues arising due to its location north of the SH. However, rural residential development is entirely appropriate. Connectivity between the Site and Izone is proposed by way of a dedicated shared walkway/pedestrian route on the southern wide grass berm of Two Chain Road which will lead directly to the new proposed pedestrian and cycle overpass to Tennyson Street and the Town centre. The Site also has excellent connectivity to Izone and the wider Rolleston Christchurch public transport and roading network.

Effects on the safety and efficiency of the SH

56. There is a concern that residents crossing the SH will reduce its safety and efficiency. Whilst not a traffic engineer, I would not expect the number of traffic movements resulting from the proposed rural residential development (368-460 per day based on 8-10 movements per household) to be significant in the context of the number of traffic movements associated with Izone related activity crossing the SH. Traffic management and roading measures required to manage Izone related traffic will equally provide for the RR related traffic. The OR refers to use of Dunns Crossing Road as an alternative route into the township. Ms Lauenstein considers that this route will not be used to any great extent as it is 'counter intuitive' and not the natural way to travel. I note that it may be used by the small RR cluster which is to obtain access from Walkers Road, comprising just 8 households.

Reverse sensitivity/strategic infrastructure

57. In Appendix 4 of his report, the Officer notes opposition to the comments by the Submitter that *"there is an urgent need for additional rural residential sections to provide for earthquake recovery housing"*. He notes that he considers that *"development and uptake of zoned land should be monitored and reviewed prior to allocation additional land for this purpose to ensure the primary goals of the LURP and Chapter 6 are not hindered by rural residential development"*.

Failure to adjoin living zoned land or LURP priority residential areas

58. This statement would appear to be incorrect. The Site adjoins the existing urban areas and priority residential areas of Rolleston located directly opposite on the south side of SH1. The fact that there is a road and railway in between is of no consequence because transport corridors occur throughout urban and rural areas and are neither urban or rural in nature.

Limitations on wastewater infrastructure

59. I am unable to comment on this matter other than in a general sense which is that the Rolleston Pines wastewater treatment and disposal sites is located nearby along Burnham School Road and there is existing reticulation to Rolleston Prison, adjoining the Site to the west, and to Izone, and the reticulation to West Melton is along Walkers Road which forms the west site boundary. I understand that the capacity constraints relate to pipe sizing and that this can be addressed by including a gravity pump as part of the development. Any upgrades necessary to service this proposed RR area should be feasible in this context.

Sufficient land

60. I agree with Ms Lauenstein that putting the RRS, including this Site effectively into a 'holding position' for the next 5 years and not really addressing the appropriate use of this peri-urban land is not appropriate. It provides no certainty to anyone and is contrary to the stated intent of the RRS to provide direction to the community, development sector, service providers or the land owners in respect to where rural residential development is anticipated within the UDS area of the District for the next 10 to 15 years⁵.
61. In my opinion, the Council should not be taking what is acknowledged in the RRS as likely to be viewed by some as a relatively conservative number of RR locations i.e. a total of 350 lots⁶, including a little less than half of which comprises the 148 PC 8 & 9 lots which are not being developed for RR purposes in the foreseeable future; and the additional approximately 8 – 14 lots proposed to be added by way of a favourable recommendation on submissions (ie the Allendale Lane, Harrington and Burgess submissions), a total of 358-364 lots.
62. I have outlined my views on this strict allocative approach above. In my opinion, the Council should not unduly worry itself with 'numbers'. Rather, it should assess particular proposals in the context of the appropriate peri-urban form for each township, whilst ensuring that the LURP's reasons for limiting the amount of RR are not offended i.e efficient servicing, protect growth paths and avoid reverse sensitivity effects with rural land. This Site 'stacks up' as a suitable location on all accounts.

CONCLUSION

63. Inclusion of the Site within the RRS as a rural residential location will provide for the most appropriate land use for the Site in the context of the overall urban form of the Rolleston township. The current Rural Inner Plain zoning is an anomaly given that the Site is currently a 'gap' in the urban form of Rolleston which comprises the residential and commercial parts of the township south of SH1 and Izone north of SH1. Excellent connectivity to Izone can be provided, which in turn has good and improving linkages to the main Rolleston township, as has been outlined by Ms Lauenstein.

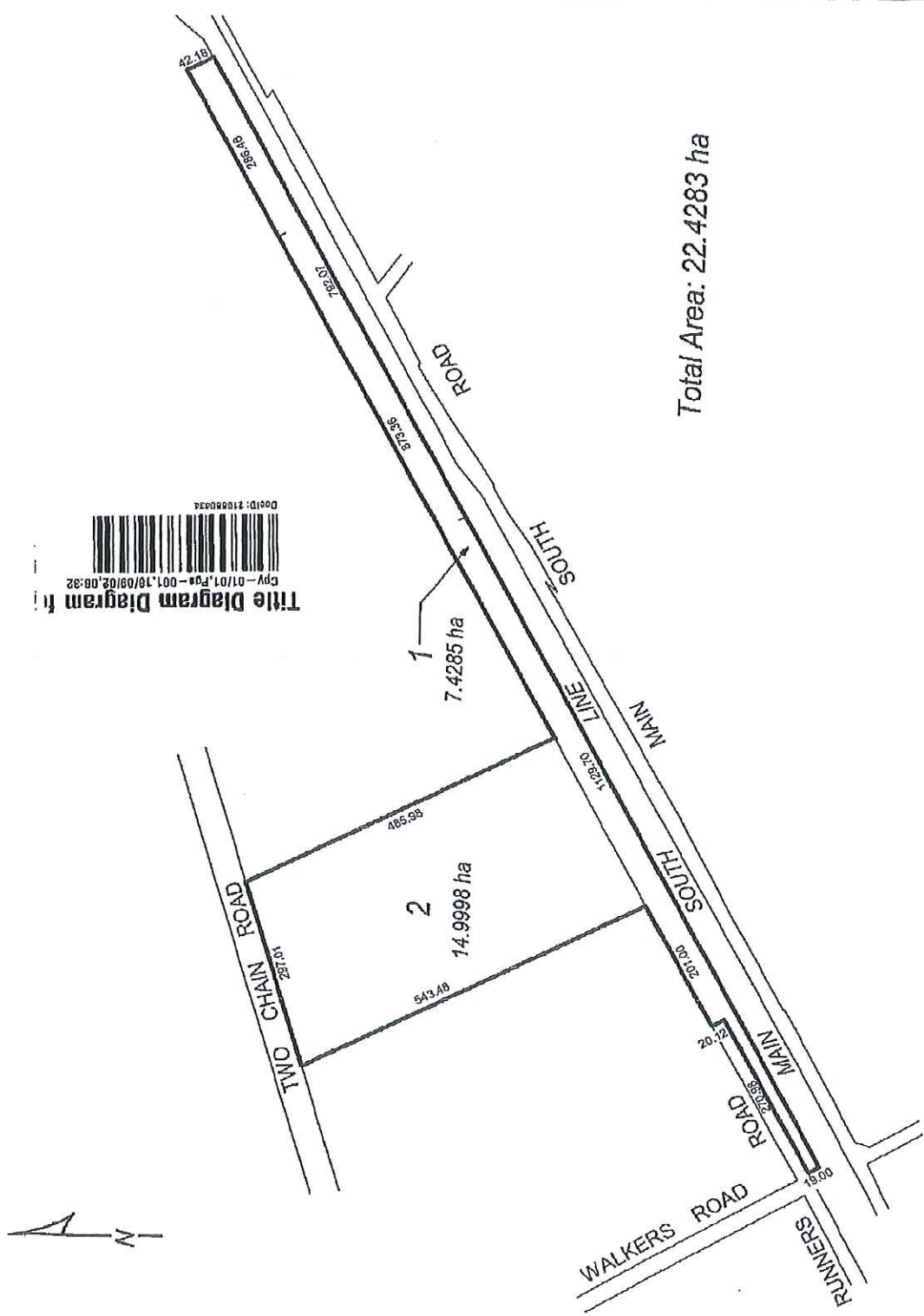
⁵ Paragraph 6.3 of RRS

⁶ This is 5 less than as stated in the Draft RRS because the Denwood preliminary site proposes an amended ODP with 5 less lots.

64. The Site comprises poor quality soils so low density rural residential use has the added advantage of not utilising good quality agricultural land.
65. Ms Lauenstein has outlined a preliminary design concept based on a relatively low density development averaging around one dwelling per ha. This will ensure rural character is maintained and a high amenity rural residential environment is created, in the form a number of discrete 'enclaves' which are well setback from the external road frontages, and the railway.
66. The evidence has established that the Site meets all of the relevant RRS criteria for rural residential locations, including in relation to connectivity, 'severance' concerns relating to the location north of the SH1 and possible reverse sensitivity issues with the SH, railway, Izone and Rolleston Prison.
67. Rolleston is an appropriate location for a reasonable amount of RR development within the peri-urban area. This is acknowledged in the RRS which notes its status as a Key Activity Centre and as having the capacity to support an increased population base within rural residential living environments.
68. Given all of the above, I fully support the inclusion of the Site in the RRS as a rural residential location.

Identifier

41210



Total Area: 22.4283 ha

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