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Submission to Selwyn District Council On: The Draft Rural Residential Strategy

Date: 3rd March 2014

Clients: Mark, Grant and Rose Crabbe Partnership

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Reviewed by: Fiona Aston



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SUBMISSION ON SELWYN DISTRICT COUNCILS DRAFT RURAL RESIDENTIAL STRATEGY

To Selwyn District Council, submissions@selwyn.govt.nz
Attention: Craig Friedel, Strategy and Policy Planner

Full Name of Submitter: Mark, Grant and Rose Crabbe Partnership

This is a submission on the Draft Rural Residential Strategy ('RRS')

1. The specific provisions of the RRS that our submission relates to are:

The whole Draft Rural Residential Strategy (RRS) including Criteria in appendix 1 and Maps in appendix 2.

2. Our submission in SUPPORT IN PART is:

We support the RRS including the criteria proposed to identify appropriate rural residential development, subject to the inclusion of the Site subject to this submission, as shown in Appendix A..

An assessment of the proposal against the criteria set out in the RRS, has been included in Appendix B below.

Submitter

The Crabbe family owns a 2.0236ha property on the south east corner of Trices Road and Birchs Road zoned Rural Inner Plains. There is one existing dwelling on the Site, in a central position, with access from Trices Road. The Site is heavily screened from adjoining land and roads by hedgerow shelter belts. The Living 1A Zone (average lot size 2000m²) is located across Trices Road from the Site, and the Living 2A Zone (average lot size 5000m²) is across Birchs Road from the Site. Immediately south of the L2A zone across Birchs Road is Preliminarily Area 4, identified in the RRS as being an appropriate area for rural residential development.

A proposed rural residential subdivision plan for the site is attached as Appendix A. This provides for a total of four rural residential sites, including the existing dwelling site, ranging in size from 3500m² to 6500m² with an average density of 5000m².

Background

In 2009 a resource consent application was made for the Site, to create three allotments between 6036m² and 7500m² in area. Most of the neighbouring property owners gave their written approval for this application. This consent was declined on the basis that the proposed subdivision would not maintain rural character and amenity (there would be a reduction in rural outlook from Trices Road at the point where views into the site were obtainable from breaks in the existing hedge to provide two additional access points); and

precedent concerns for other potential proposals for higher density subdivision adjoining townships than that anticipated for the Rural Inner Plains.

It is important to note that the statutory tests/relevant matters are different for a rezoning request, compared with a non complying resource consent application, as sought in 2009. If the land is identified in the RRS as suitable for rural residential development, and subsequently rezoned (by private plan change or potentially a more streamlined CER Act process. Precedent issues will not be relevant and the L3 zone rather than Rural Inner Plains character and amenity desired outcomes will apply as set out in the Draft RRS – essentially *“a sense that the subdivision is located in a semi rural setting through the provision of abundant open space and frequent views to the hinterland beyond”*¹.

Rural Residential Strategy

The Draft Rural Residential Strategy identifies five sites which 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

The site meets all of the above pre-requisites as follows:-

Reticulated services:

In this case the site is located adjoining existing living zones across Birchs and Trices Roads, and has already been identified in the 2009 consent decision. The existing dwelling on the site already has reticulated town water. Given the location adjoining existing reticulated residential development and the small size of the proposed rural residential ‘node’ (just 4 lots), it is anticipated that reticulated wastewater should be feasible.

Integration with Townships

The location of the site, adjoining the existing Prebbleton township area, ensures that the development is able to integrated with the Township. The site is located on the corner of Birchs Road which provides excellent opportunity for walking and cycling into Prebbleton centre.

Consolidation/Intensification

A total of only three additional rural residential lots are proposed. This is an insignificant and inconsequential number which will have no impact on the consolidation and intensification principles of the relevant statutory planning documents.

Constraints

¹ Draft RRS age 33

The site does not contain any significant vegetation or trees, cultural sites, designations, historical sites, strategic infrastructure or utilities, springs or waterways. The site is not located in the vicinity of any intensive farming activities, the RRS identified high groundwater areas, or any flood hazard zones. The Site is located in the area where liquefaction assessments are required, however it is noted that land directly opposite existing house on the Site (21 Brahman Close off Stonebridge Way) is CERA Green zone TC1 which means it has good ground conditions and is not subject to geotechnical constraints.

Landowner Aspirations

The current landowners have demonstrated their desire to develop this site through the application for the 2009 resource consent and through this submission.

Conclusion

Given the site meets the above noted pre-requisites, and meets the RRS criteria for identifying suitable rural residential sites (see Appendix B), the Submitters consider that this site is appropriate for rural residential development and seek its inclusion in the RRS as such.

Land Use Recovery Plan

We note 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. We consider that the use of the Site for rural residential development has been demonstrated through this submission to be an efficient use of land and infrastructure which, but virtue of its location, does not limit future urban growth. It is considered that the development of the site for rural residential purposes will not create adverse effects with surrounding rural land.

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."

Making provision for rural residential in peri-urban locations is most efficient in terms of transport efficiency, due to proximity to urban services. Inclusion of the Site will not compromise but rather enable consolidation of the urban form of Prebbleton as a concentric, compact and walkable township. The assessment establishes that there will be no adverse effects on rural character or neighbouring rural land uses which are in reality 'semirural lifestyle' type activities due to the small holding sizes and location in close proximity to Prebbleton Living zones.

Action 18 of the LURP requires that SDC recommend to the Minister of Earthquake Recovery methods to implement to RRS by June 2014. With respect to the Site, the land can

be rezoned to a 'future proofed' L3 zone without further public process then the RRS submission and hearing process, as the

Relief Sought

- That SDC adopt the Draft RRS as the Final RRS subject to the inclusion of the Site the subject of this submission as identified in Appendix A attached as a rural residential location.
- That in relation to Action 18 of the LURP, SDC recommend to the Minister of Earthquake Recovery that the land subject of this submission be rezoned Living 3 without any further public process; or a streamlined process be adopted which allows for public consultation on rural residential locations that were not included in the Draft RRS. There is an urgent need for additional rural residential sections to provide for earthquake recovery housing needs which need to cover the full spectrum of housing types.

Conclusion

The Crabbe Partnership considers that the site the subject of this submission is a suitable area for rural residential development on the edge of Prebbleton Township. This site will provide appropriate township consolidation and enable the development to be integrated with the Township. The site can be serviced with reticulated services without putting undue pressure on existing systems, and will provide appropriate sections to meet the market demand. The site meets the criteria of the RRS and is appropriate in the context of the provisions of LURP, the Prebbleton Structure Plan and the Selwyn District Plan.

3. **We do wish to be heard in support of our submission.**
4. **If others make a similar submission, we will consider presenting a joint case with them at a hearing.**

5. Signed:..... 3 March 2014

6. Address for service of submitter:

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Appendix A –Possible Subdivision Plan



Appendix B – Assessment Against RRS criteria for Lincoln

Rural Residential Strategy (2013) assessment Criteria (reproduced)

The criteria are categorised into the following three groups:

C = The critical outcomes required to achieve the goals of the UDS and Appendix 1 of the Land Use Recovery Plan - Chapter 6 of the CRPS

SS = Site specific issues that require detailed assessments and contextual analysis to determine how any identified potentially adverse effects could be avoided, remedied or mitigated

Na = Matters that do not apply to certain geographic locations within the UDS area of the District

Generic Criteria	Prebbleton	Proposed Site
Chapter 6 of the CRPS (LURP)		
Located outside the identified priority areas for development and existing urban areas	C	The site is located outside of identified priority areas.
Located so that it can be economically provided with reticulated sewer and water supply integrated with a publicly owned system, and appropriate stormwater treatment and disposal	c	Adjoins Living zones and can be serviced by extensions to these services.
Access provided to a sealed road but not directly to Strategic and Arterial Roads (as identified in the District Plan), and State Highways	ss	Access will be provided to Trices Road, which is not a strategic or arterial road.
Avoid noise sensitivity activities occurring within the 50 dBA _{Ldn} air noise contour so as not to compromise the efficient operation of the Christchurch International Airport, or the health, well-being and amenity of people	Na	This criteria does not apply to this site.
Avoid the groundwater recharge zone for Christchurch City's drinking water	Na	This criteria does not apply to this site.

Avoid land required to protect the landscape character of the Port Hills	Na	This criteria does not apply to this site.
Not compromise the operational capacity of the West Melton Military Training Area or Burnham Military Camp	Na	This criteria does not apply to this site.
Support existing or upgraded community infrastructure and provide for good access to emergency services	C	The proposal will not impede access for emergency services, and the proposal will not have an impact on existing community infrastructure.
Not give rise to significant adverse reverse sensitivity effects with adjacent rural activities, including quarrying and agricultural research farms, or strategic infrastructure	Ss	The Site is not located in proximity to rural activities which are likely to create reverse sensitivity effects. There are no intensive farming activities in the vicinity. There is a pattern of existing semi-rural lifestyle small holdings with horse grazing the main 'rural' activity. The Site borders another similar sized allotment to the south, and a small historical residential sized section to the east. Beyond this small section the adjoining properties to the east (along Trices Road), while a little larger in size, include the residential component of their activities adjacent to the road frontage, meaning grazing activities are located away from the boundary of the subject Site.
Avoid significant natural hazard areas, including steep or unstable land	na	This criteria does not apply to this site.
Avoid significant adverse ecological effects	ss	There is no significant ecology located on the site due to its historical use for grazing horses and residential activity.
Not significantly adversely affect ancestral land, water, sites, wahitapu and wahitaonga to Ngai Tahu	ss	No identified cultural sites exist on the site.
Avoid adverse effects on existing surface water quality	ss	Appropriate stormwater management on the site will ensure there are no adverse effects on surface water quality.
Integrate into, or consolidate with, existing settlements	c	The proposal is located adjoining the urban limits of Prebbleton and is able to be integrated with and consolidate the Township. In particular the location of the site adjoining living zones on the

		north and the west of the site ensure the site gives the township a compact shape, essentially 'filling in' the shape of township to create a compact form.
Development site supports the development of an ODP and is not seen as a transition to full residential forms of development	c	The site is of sufficient size to support only a limited number of rural residential blocks. . An ODP can be prepared for the Site, or conditions imposed on the required subdivision which will ensure appropriate 'ruralness' to the subdivision design.
Rural residential form, function and character		
Avoid locations that are obvious residential growth paths	c	The site is not located in an obvious residential growth path. The RRS identifies land in an arc between west of the zoned township as the 'preferred urban form' for Prebbleton.
Support locations that directly adjoin and are able to consolidate with Townships and residential Priority area to support the provision of economically viable infrastructure and to promote social cohesion and ready access to recreational, employment and other services established within Townships	c	The Site adjoins living zones to the north and east, and is located at the corner of Birchs and Trices Road. Birchs Road provides excellent walking and cycling facilities between the Site and the centre of Prebbleton, and contains public transport options to enable connections to Lincoln or Christchurch City, thus providing for social cohesion and ready access to recreational, employment and other services, within Prebbleton, and beyond.
Support locations that can sustain a mixture of housing densities ranging from 0.3ha to 2ha in size whilst achieving an overall density of 1 to 2 hh/ha, but where the overall area supports sustainable enclaves in respect to the overall number of households to enable the anticipated rural residential form, function and character to be achieved	ss	The development of the site is proposed to include a mixture of housing densities to provide for smaller lots adjoining Birchs Road and larger lots with added distance from the corner along Trices Road. Densities will be within the 0.3 – 2ha range with an average density of 5000m ² . The smaller 3500m ² lots will have a boundary with rural land to the south, and larger sized rural residential sized lots to the west and east.
Avoid locations that may compromise the quality of ecosystems or indigenous biodiversity and ensure that rural residential areas do not adversely affect ancestral	ss	The Site will not compromise the quality of ecosystems, nor affect any cultural site, or water course.

land, water, and the WahiTapu and Wahi Taonga of Te Rununga o Ngai Tahu and Te Taumutu Rununga. These include the need to protect and enhance rivers, streams, groundwater, wetlands and springs within the catchment of Lake Ellesmere/TeWaihora, springs and any associated mahingakai sites.		
Support locations that utilise existing road layouts and physical features as buffers and definitive boundaries between urban and rural residential activities to limit peri-urban sprawl	ss	The use of existing roads and significant shelter belts provides definite boundaries and will assist in limiting peri-urban sprawl. The existing shelterbelts with adjoining rural land will be retained, but given the low density/rural residential development to the west and north, retention of the road frontage shelterbelts may not be necessary. The site does not need to be 'hidden' from these adjoining living areas, and a more open aspect might be preferred by future purchasers. As can be seen from the zoning map attached as Appendix C, the site is clearly distinguishable from other lots with frontage to Trices Road and east of Birchs Road and replicates and will 'complete' the subdivision pattern for the existing L2A zone with frontage to Trices Road west of Birchs Road. It is a rectangular shaped with limited depth along Birchs Road and a longer frontage with Trices Road. All other lots to the east have far greater 'depth' to the south.
Landscape values		
Discernibly logical boundaries determined by strong natural or physical features	c	The Site will retain its strong boundaries created by existing shelter belts and roads.
Exclude land required to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch	ss	This site is not required to maintain open space between urban activities with Greater Christchurch as it is located on the southern side of the township and represents such a small area.

Protection of natural features, significant trees and vegetation	ss	The existing mature shelter belts are proposed to be retained as part of any future development.
Manage the amount of households within single locations to avoid the collective visual effects of intensified land use	c	This development would include the addition of 3 more households, which would be screened by existing shelter belts.
Address the constraints to development identified in the Landscape Constraints Map prepared by Andrew Craig Landscape Architect (see Appendix 1 RRS13)	ss	None apply to this land.
Locations to adjoin Township boundary's by have an ability to achieve a degree of 'ruralness' as a consequence of adjoining land use and natural attributes	c	The site will retain a degree of ruralness due to the existence of a woodlot and open paddocks to the south and larger land holdings to the east. Additionally the retention of shelter belts along the southern boundary of the site will add to the sense of ruralness. The road perimeter shelterbelts can be retained is this is Council's preference, but this may not be necessary. It is anticipated that as a rural residential area, the Site would display aspects of rural activities as well as residential activities, which may include the grazing of ponies.

PREBBLETON ENVIRONS STUDY AREA CRITERIA		
Urban form and growth management	Critical or site specific matter	Proposal site
Rural residential development nodes to: (a) adjoin the residential priority areas and Living zone land; and (b) be consistent with the urban settlement patterns and strategic planning outcome outlined in the Prebbleton Structure Plan and the Growth of Township objectives and policies of the District Plan, including specifically the promotion of future residential expansion to the east and west of Springs Road to achieve a compact concentric urban form and to minimise adverse effects on Springs Road by limiting the length of rural residential boundaries north and south of this road	c	Achieved – the site is located adjoining living zones to the north and east of the site. The site provides for a compact township form, and is not located as ribbon development along Springs Road
Prebbleton and its environs have a reduced capacity to support significant rural residential households, which may	c	Achieved – the site represents a small but serviceable rural residential development, and will retain the desired rural outlook

undermine the discrete character and rural outlook attributed to the Township, and place pressure on community services and local infrastructure that are anticipated to only service a relatively small population base (refer to appendix 2 – Map 24)		through maintaining shelter belts along road frontages if this is Council preference.
Avoid ribbon development along the alignment of reticulated services and strategic roads that may undermine the contrast between rural and urban forms of development and the distinctiveness of the primary gateways to Prebbleton (refer to Appendix 2 – Map 24)	ss	Achieved – the Site is not located in a manner that creates ribbon development
Preserve the obvious residential growth path west of Springs Road between Trents and Hamptons Roads, which presents a long term opportunity to achieve a compact concentric urban form for Prebbleton (refer to Appendix 2 – map 24)	ss	Achieved
Avoid locations that may contribute to the long term coalescence of Prebbleton with the Townships of Lincoln and Templeton and development within the Christchurch City territorial authority boundary (refer to Appendix 2 – Map 24)	c	Achieved – the site is located on the southern side of Prebbleton, but does not extend significantly towards Lincoln.
Rural character and productivity		
Support locations that maintain appropriate separation from the Intensive Farming Activities legitimately established on the periphery of Prebbleton (see Appendix 2 – Map 5)	ss	Achieved – there are no intensive farming activities in the vicinity of the site.
Maintain the visual distinction and amenity contrast between the rural periphery of Prebbleton and the larger urban forms of Rolleston, Lincoln and Christchurch City, particularly at the interface between the Prebbleton 'Greenbelt' and the industrial activities occurring within Christchurch City Council's territorial authority boundary to the north (refer to appendix 2 – Map 24)	c	Achieved – the site is on the south-eastern boundary of the Township, but does not significantly extend Prebbleton towards Lincoln.
Strategic Infrastructure		
Avoid locations that may not be able to connect to strategic infrastructure where it is available and cost effective to do so, including roading, stormwater management and reticulated water and wastewater networks (refer to the 5Waters Activity Management Plan and Transportation Activity Management	c	Achieved – the site location adjoining the township ensure reticulated services can be provided.

Plan)		
Avoid locations that may undermine the efficient operation of the strategic Infrastructure referenced in the District Planning Maps and the associated Study Area Maps contained in Appendix 2 – Map 8: Transpower high voltage transmission lines, Orion electricity substation on the southern outskirts of Prebbleton (OR11), Shands Road cemetery (D172), SH1 four-laning and CMS2, Ladbroke Primary School (ME22) and Broadfield Primary School (ME17)	c	Achieved
Natural hazards		
Avoid locations that are constrained by the high groundwater table, SDC recorded flood sites, Lower Plains Flood Areas and associated land drainage issues (including drains, springs and waterways) (see Appendix 2 – Map 15)	ss	Achieved as the site does not have any constraints relating to these matters.
Avoid locations where liquefaction and lateral spreading was observed during the Canterbury Earthquakes, in addition to areas made up of fine saturated soils and where there is a high groundwater that may be susceptible to significant damage during further earthquake events (see Appendix 2 – Map 20)	ss	No liquefaction was observed during the 2011 earthquakes, and land across Trices Road (21 Brahmin Close) has been given a TC1 rating, which is likely to apply to the site given its close proximity.
Environmental, cultural and heritage values		
Avoid Land that may compromise the health, longevity or setting of the registered Protected Tree located on Ladbroke School grounds (T104) (See Appendix 2 – Map 8)	ss	Achieved
Avoid locations that may compromise the cultural values attributed to the Wahi Taonga Management Site to the south-east of Prebbleton (Oven C65) (see Appendix 2 – Map 8)	ss	Achieved
Avoid locations that may compromise the historic values attributed to the registered Heritage Buildings in proximity to Prebbleton, including specifically Wheatsheaf House (H302), and Trents Chicory Kiln (H208) (see Appendix 2 – Map 8)	ss	Achieved
Consider the extent to which any locations may reduce the productive capacity of Class I and II versatile soils on the periphery of Lincoln (see Appendix 2 – Map 21)	ss	The site is located on Class II and IV land, but has very limited existing or potential productivity given the very small size (2 ha) and proximity to the township. Current farming activity on this

Investigate the environmental impacts of facilitating rural residential growth on land that may be potentially contaminated, including sites identified on the eastern edge of the Township and on Tosswill Road to the north-east (see Appendix 2 – Map 8)	ss	site pony grazing. Investigations will be required at the time the site is developed, , although given the history of the site for grazing horses, it is unlikely any contamination will be present.
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