

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: Conifer Grove Trustees Ltd

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 identification and inclusion of Area 4 into the RRS as an appropriate location for rural residential development.

2. Our submission in SUPPORT IN PART is:

We support the identification of our site as part of preliminary rural residential Area 4 and seek that this be confirmed as a definite rural residential area. We also support the description and assessment of the suitability of Area 4 for Rural Residential purposes as set out in the RRS, Paragraphs 6.41 – 6.58 (pp 58-62). We consider that our site is consistent with the RRS assessment criteria for identifying suitable sites for Rural Residential Development, and an assessment of this is included in Appendix A below. Furthermore it is considered that rezoning of Area 4 is consistent with the Prebbleton Structure Plan as set out in Appendix B, and consistent with the objectives and policies of the Townships Volume of the District Plan as established in the application for Plan Change 36.

Submitter

Conifer Grove Trustees Ltd owns 7.4352ha of land within the area identified in the Rural Residential Strategy (RRS) as 'Preliminary Area 4'. This site along with two adjoining sites in the same block is currently being considered under Plan Change 36 to the Selwyn District Plan (on hold pending the outcome of the RRS).

Background

Plan Change 36 was lodged in July 2013 and has been placed on hold pending the outcome of the Land Use Recovery Plan and subsequently the RRS. The Plan Change application included an assessment against the District Planning objectives and policies and provided an ODP, Traffic Impact Assessment, Geotechnical Report, and a contamination report for the potential rezoning of the site from Rural (Inner Plains) to Living 3. The Plan change sought an average density of 7500m² across the site, and provided for larger sections to the south with smaller sections to the north of the site to provide a transition from residential to rural, and reducing the likelihood of further development to the south in the future, hence providing a consolidated Township form.

Given this pending plan change, and given Conifer Grove's intention to develop this site in the immediate future (pending the outcome of PC36), Council can have confidence that including this site as rural residential will result in becoming sections available to meet market demand for rural residential lots in the very near future.

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 Conifer Grove site for rural residential development has been demonstrated through PC36, and through this submission, to be an efficient use of land and infrastructure which does not limit future urban growth, and does not create adverse effects with surrounding rural land.

Submissions/Consultation

The proposal for the Area 4 site to be developed for rural residential purposes has already been through consultation processes in the form of submissions on PC36, in addition to consultation on the Draft RRS. PC 36 has drawn strong support (4 submissions in support or partial support) and minimal opposition (2). Only 3 submissions have raised any concerns, which have been readily addressed as outlined in Appendix C.

Relief Sought

That SDC adopt the Draft RRS as the adopted RRS subject to removal of the wording 'preliminary' rural residential areas especially when referring to Area 4 Prebbleton (the land the subject of this submission) and confirming that Area 4 is a preferred rural residential area in the RRS in accordance with the suggested wording amendments attached in Appendix D.

Implementation of the RRS13 - That in relation to Task 18 of the LURP, SDC recommends to the Minister of Earthquake Recovery that PC36 be made operative immediately under the provisions of the CER Act with no further public process required. The RRS hearing process is sufficient to consider the merits of the rezoning proposal and all matters raised in submissions on PC36 can be appropriately addressed at the RRS hearing. 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

Conifer Grove Trustees Ltd considers that its site within Area 4, and subject to PC36 is a suitable area for rural residential development on the edge of Prebbleton. This site will accommodate the southern extent of the Township and also achieve appropriate consolidation of 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, and the Prebbleton Structure 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.



Anna Mackenzie (Fiona Aston
Consultancy Ltd), on behalf of
Baseline Planning Ltd

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

6. Address for service of submitter:

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Appendix A – Assessment Against RRS criteria for Prebbleton

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 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 the Living 2A zone ensuring it can be serviced economically with appropriate 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	Plan Change 36 includes access from Brichs Road, Hamptons Road and Trices Road for various different potential sites with most access being provided from Hamptons Road, including for rear allotments. An assessment as to the proposal's traffic effects has been made concluding that the proposal can go ahead without any capacity, efficiency or road safety issues arising.
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 application for PC36 sets out that given there are no practices which result in objectionable noise or odour at present on site or adjoining to the south or east, it is unlikely that reverse sensitivity effects will occur.
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	PC 36 sets out that there are no known significant ecology in the area given the historical pastoral use of the site.
Not significantly adversely affect ancestral land, water, sites, wahi tapu and wahi taonga to Ngai Tahu	SS	PC 36 sets out that there are no known sites identified on the site, however specific consultation has been undertaken with Iwi, although no comment has been provided as yet.
Avoid adverse effects on existing surface water quality	SS	PC 36 sets out that an un-named drain runs along the south and west of the site, although it is noted that the application is unlikely to result in discharges to this drain.
Integrate into, or consolidate with, existing settlements	C	The proposal is located adjoining the L2A zone to the south of Prebbleton and is able to consolidate the Township.
Development site supports the development of an ODP and is not seen as a transition to full residential forms of development	C	An ODP has been proposed as part of PC 36 which includes larger sections within the southern portion of the site ensuring the proposal is not a transition to full

		residential forms of development
Rural residential form, function and character		
Avoid locations that are obvious residential growth paths	C	The use of Hamptons Road as the southern boundary of Prebbleton precludes this from being an obvious residential growth path.
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 proposal adjoins the Living 2A zone and is appropriately able to consolidate the Township which is part of the an urban priority area.
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	Plan change 36 includes an average dwelling density of 7,500 m ² , and therefore meets the thresholds set out in the RRS. All lots are a generous size (ranging from 5000m ² to 1.26 ha on the conceptual subdivision layout). Most will enjoy direct outlooks onto adjoining rural land in Hamptons and Birchs Road. All lots will retain a high degree of openness and rural character, consistent with the rural residential character sought in the RRS.
Avoid locations that may compromise the quality of ecosystems or indigenous biodiversity and ensure that rural residential areas do not adversely affect ancestral land, water, and the Wahi Tapu 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/Te Waihora, springs and any associated mahinga kai sites.	SS	As set out in PC 36 the proposal does not compromise the quality of ecosystems or indigenous biodiversity, and it ensures that the proposed rural residential meets the requirements of this criteria.
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 proposal notes that Hamptons Road as a physical limit for the southern extent of the Township to provide a logical boundary and to avoid peri-urban sprawl.
Landscape values		

Discernibly logical boundaries determined by strong natural or physical features	C	Physical road features provide for logical discernible boundaries for this site.
Exclude land required to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch	SS	The proposal site is on the south of Prebbleton and this criteria is not relevant
Protection of natural features, significant trees and vegetation	SS	There are no known natural features or significant trees or vegetation of note on the site due to the historical and current pastoral use of the site.
Manage the amount of households within single locations to avoid the collective visual effects of intensified land use	C	The proposal is for a small rural residential node of 18 households.
Address the constraints to development identified in the Landscape Constraints Map prepared by Andrew Craig Landscape Architect (see Appendix 1 RRS13)	SS	
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	Land across Hamptons Road will remain Rural Inner Plains zoned and provide a degree of ruralness.

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	C	Achieved

boundaries north and south of this road		
Prebbleton and its environs have a reduced capacity to support significant rural residential households, which may 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)	C	Provides a southern extent to township reducing further impacts on services
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
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
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 not intensive farming activities in the locality.
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 southern boundary of the Township
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 Plan)	C	Achieved, PC36 sets out servicing options
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, appropriate consideration of the Orion Electricity Substation have been made as part of PC36.
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
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	Achieved- geotechnical reports for PC36 set out that the site is outside of identified zones and is not subject to liquefaction.
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	SS	Achieved

the registered Heritage Buildings in proximity to Prebbleton, including specifically Wheatsheaf House (H302), and Trents Chicory Kiln (H208) (see Appendix 2 – Map 8)		
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	PC 36 sets out that there will be some loss of soils, however due to the sites location adjoining a Township this loss is appropriate.
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	PC 36 includes a contamination report which sets out potential environmental impacts arising from the future development of the site, and concludes that there are no contamination constraints on the site which would preclude future residential development.

Appendix B – Prebbleton Structure Plan

The Prebbleton Structure Plan (February 2010) sets out its purpose as being;

"The purpose of this document is to provide a framework for coordinating development and other changes in Prebbleton in order to achieve a high standard of town planning and urban design."

Section 8.5 of the Structure Plan specifically identifies concerns regarding rural residential development adjacent to Prebbleton, but specific concern relates to keeping Prebbleton as a distinct township from potential expansion of Christchurch City to the north-east.. The Proposal is located on southern side of Prebbleton Township, and will not contribute to 'filling the gap' between Prebbleton and Christchurch City.

The Structure Plan goes on to identify the following relevant issues relating to the growth of Prebbleton:

- Current lack of sewer connections
- Creating a sensitive urban edge
- Avoiding reverse sensitivity at the rural/urban boundary
- Potential for and impact of, rural residential development

With respect to rural residential impacts, the Structure Plan notes:-

There is particular pressure for large sections around Prebbleton, due to its proximity to Christchurch. However, this must be assessed against the need to curb the outward sprawl of the city and maintain separation between Prebbleton and its rural surrounds.

In the case of the above issues, these matters have been addressed through PC36, and through the upgrading of sewer reticulated services in the Selwyn District generally since 2010 (when the Prebbleton Structure Plan was adopted).

Overall it is considered that developing Area 4 for rural residential purposes (proposed under PC36), is consistent with the provisions of the Prebbleton Structure Plan, albeit they are limited with respect to rural residential development.

Appendix C – Submissions to PC 36

There are three submissions in opposition to PC36, which are addressed as follows:

Murray Sinclair – Opposition

Submission:

Mr Sinclair is an adjoining neighbour to the north, and sought larger section sizes (greater than 7890), an upgrade to the sewage scheme to provide for 48hrs holding capacity in case of power outages, provisions to protect existing shelter belts and more information relating to the use and control of the water bores on the site.

Resolution:

- Rural residential density is typically between 1 – 2hh/ha (as set out in the RRS), and PC36 seeks to achieve these densities.
- The PC36 applicant accepts that power is problematic in many parts of Canterbury. Engineering solutions for wastewater will form part of the specific future subdivision for the site, which will resolve this issue.
- Information relating to water bores is considered as a matter for Environment Canterbury to address as part of subsequent water consents associated with future subdivision design.
- Some shelter belts are able to be retained and discussions with individual neighbouring land owners will achieve this.

Orion – support in part

Submission:

The submission states that Orion have not been consulted with regard to the proposed layout of their land shown on the outline development plan and concept subdivision plan.

Orion support the change of the site to Living 3 but note their concern with the density shown on their land (1ha blocks) and consider that a subdivision plan should not be included as part of the plan change process as it is too prescriptive, and limits the Orion land to 4 allotments (inclusive of the utility allotment for the substation). Orion also note concern that the limited flexibility resulting from a prescribed subdivision plan could create reverse sensitivity effects with the substation.

Resolution:

Applicant undertook several months of consultation with Orion during the initial development of PC 36. Orion made it very clear that they did not wish to be involved with the specific Plan Change application process. As a result, the application was made with regard to their land, but no specific geotechnical or contamination testing was carried out on their land, nor was the lot layout discussed, due to Orion's refusal to be part of the plan change application.

The lot layout shown on the outline development plan is indicative for the purpose of demonstrating proposed densities and we would expect that future subdivision of this site will be in *general* accordance with this plan.

Te Taumutu Runanga – Opposition

Submission:

Stormwater: Concern is raised about the assumed highest groundwater level of 3.7m given levels indicated in wells in the area. The effect of discharging stormwater to ground and its effect on groundwater quality without appropriate treatment is noted, as well as a concern that there are free draining soils under the site. Te Taumutu Rūnanga sought more information regarding the specific design and treatment of stormwater management systems.

Water supply and water efficiency: sought confirmation that reticulated water supplies are sufficient to supply this site. Te Taumutu Rūnanga is concerned about the detrimental effects of abstraction of groundwater in the general Selwyn district area.

Wastewater: concern about the proposed wastewater system, and seek more information to demonstrate that wastewater systems will not adversely impact groundwater, surface water and soil

Earthworks: potential adverse effect of construction on groundwater and surface water. Note that conditions of future consents need to include conditions ensuring the protection of these water bodies during construction.

Landscaping : a lack of planting is proposed in public spaces such as roads within the site and sought that landscaping be included which specifies native species.

Protection of waterways : sought the protection of water quality entering drains given the connect with the larger waterway system. Riparian planting is sought to provide for water quality and as an opportunity to improve ecology and visual amenity of the proposal site.

Accidental discovery: sought that a condition of consent be included regarding accidental discovery of undiscovered wāhi taonga or wāhi tapu

Low impact building design: suggested consideration of low impact building designs.

Resolution:

- Stormwater matters will be appropriately addressed in later discharge applications with Ecan.
- Water supply will be achieved as part of the detailed engineering design of any future subdivision on the site.
- Wastewater: any discharge will required a discharge consent, however it should be noted PC36 does not include a discharge to the ground.
- Earthworks will be addressed through specific design as part of any future subdivision consent application.
- Landscaping is not a matter controlled through the plan change process, but rather as a Council owned reserve Council will determine appropriate species
- Protection of waterways will be achieved during construction through use of best practice methods and any consents required.

- Waterways are not included on the subject site and so riparian planting cannot be achieved through this process.
- Accidental discovery protocols: appropriate conditions relating to this can be included as part of any future subdivision consent.
- Low impact building design: future dwellings on this site will be established individual lot owners in accordance with the building code requirement. It is not intended to limit individual landowners options.

Appendix D – Proposed amended wording for RRS Section 6 ‘Rural residential area assessment’

Note: proposed changes have been made with insertions identified with an underline and **bold** and deletions identified with a ~~strikethrough~~

Paragraph 6.1-2

6.1 The following rural residential areas have been identified by Council as suitable locations for rural residential development. ~~on a preliminary basis as a starting point to inform the consultation and comments phase of the Rural Residential Strategy process.~~

6.2 The preliminary identified rural residential locations satisfy the following pre-requisites:

Paragraph 6. 58:

Sub-regional guidance – LURP/Chapter 6 to the CRPS

- The land holdings are both outside the Township boundary and adjoin existing rural residential or Living zone environments. This zoning pattern assists in ensuring any future development is consolidated with the existing Township. It also assists in preserving the open space character between Prebbleton, other large townships in the eastern area of the District and Christchurch City.
- The locations avoid the sub-regional constraints outlined in Policy 6.3.9 of Chapter 6 of CRPS.
- Preliminary Areas 3 and 4 adjoin the Kingcraft Drive EDA and the Living 2A zones respectively, ensuring the sites can be economically provided with reticulated water and wastewater.
- Preliminary Area 4 is located in proximity to land where liquefaction occurred during the Canterbury Earthquakes. Detailed geotechnical investigations ~~will be required as~~ **have been provided as** part of the plan change **36 and have** ~~process to determined~~ **that the site had a low risk of liquefaction in a future earthquake events and the site is appropriate for rezoning for rural residential purposes** ~~the appropriateness of any proposed rezoning.~~ There are no other natural constraints associated with either of the identified locations.

Rural residential form, function and character

- The site enables rural residential development to be consolidated with the settlement pattern of Prebbleton.
- The risk of ribbon development occurring along Trents Road is reduced as preliminary Area 3 represents the full extent of residential or rural residential growth west of Prebbleton based on Shands Road being a definitive boundary.
- The risk of ribbon development occurring south along Birchs Road is reduced as preliminary Area 4 reflects the full extent of residential or rural residential growth south of Hamptons Road.

- The development blocks are small contained nodes that enable appropriate boundary treatments to be established to integrate the sites into both the urban and rural environments. There are definitive road boundaries and established land uses that reduce the potential of on-going urban sprawl, adverse reverse sensitivity effects and the urban form of Prebbleton coalescing with Lincoln to the south and Christchurch City to the north.
- The ability for both sites to integrate with the existing settlement pattern will assist in achieving a concentric urban form that enables ready access to the town centre. Preliminary Areas 3 and 4 are 1.8km and 1.3km from the town centre respectively.
- There is likely to be sufficient capacity within the Council's roading and community water and sewerage network to service both areas.
- The locations avoid the majority of strategic infrastructure established on the periphery of preliminary Prebbleton, with the exception of the Orion substation on preliminary Area 4 and the proximity of Shands Road to preliminary Area 3. The effects of the proposed rezoning **of Area 4 on the Orion Substation has been considered as part of PC 36, with appropriate mitigation measures in place to avoid any reverse sensitivity effects arising.** Any rezoning of Area 3 these land holdings on these strategic assets will need to be determined through the plan change process.

Landscape values

- Proposals for preliminary Areas 3 and 4 will need to include layouts, interface treatments and development controls to avoid any potentially adverse visual and amenity effects and achieve the necessary degree of 'ruralness' and 'rural residential character'. These environmental effects will need to be considered under the plan change process.
- **Plan Change 36 includes an appropriate layout, providing larger sections on the rural edge of the site, to avoid reverse sensitivity effects with rural activities to the south, and to provide appropriate levels of ruralness for each of the proposed sections. The environmental effects of developing this site for rural residential purposes have been considered under PC 36, and are no more than minor.**
- The size of the development blocks support a small rural residential node, which will enable each parcel to achieve the necessary degree of 'ruralness' and avoid adverse visual effects associated with larger rural residential nodes where the number of smaller sections collectively represent more 'urban' characteristics.
- The sites are contained by discernible boundaries formed by existing roads and land use characteristics, which includes strategic roads and established low-density living environments.

District Plan guidance

- The loss of rural character and amenity has been reduced as preliminary Areas 3 and 4 can be consolidated with the urban form of Prebbleton, which also reduces the potential for adverse reverse sensitivity effects with strategic infrastructure and productive rural land uses.

Prebbleton environs study area guidance

- The location of both areas adjoining the Township boundary, and established rural residential environment, supports a rural residential node that is able to integrate with the existing settlement pattern.
- Neither of the land holdings are recognised as long term residential growth paths in the SDP or Prebbleton Structure Plan.
- Both locations avoid the sensitive rural interface between Prebbleton and Christchurch City to the north and the obvious future residential growth path west of Springs Road between Trents and Hamptons Roads.
- Prebbleton has a reduced capacity to support an increased population base as it is not an identified Key Activity Centre, with significant growth placing pressure of community infrastructure, services and business areas. Significant growth may also undermine the discrete township amenity that characterises Prebbleton.
- ~~Consideration of the appropriateness of establishing rural residential densities adjacent to Shands Road will need to be considered as part of any rezoning proposal for preliminary Area 4.~~
- The sites are not subject to any identified natural hazards, potentially contaminated sites, Protected Trees, cultural sites, heritage sites or sites of ecological value and there are no significant servicing constraints.
- Preliminary Area 3 assists in achieving the long term compact concentric urban form of the Township by supporting growth west of Springs Road.
- Avoid any identified Significant Natural Areas, intensive farming activities, designated sites or any other strategic infrastructure.
- **Site contamination reports and geotechnical Reports for Area 4 have been provided through PC 36, and indicate that the site can be remedied to ensure that there is little risk to human health or safety from potentially contaminated land, nor from potential susceptibility of the land to liquefaction and lateral spread during large earth quake events**
- Additional site specific assessments **for Area 3** will be required to confirm the presence of any potentially contaminated soils associated with the historic farm use. In addition, geotechnical investigations will also be required to establish the lands susceptibility to liquefaction and lateral spread during large earthquake events.
- A portion of both sites contain Class II versatile soils, with the private plan change requests **having to assessing** the impacts of any loss of these high quality soils on the productive capacity of the Canterbury Plains, **and determining for Area 4, that the loss of versatile soils in this area is outweighed by the positive effects of enabling appropriate development.**
- The appropriateness of zoning preliminary Areas 3 and 4 to facilitate rural residential will need to be **has been** determined as part of the plan change process **for including specifically the consideration of Plan Changes 41 and 36 respectively and it is considered appropriate to rezone these site for rural residential purposes.**