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

Date: 3rd March 2014

Client: Pinedale Enterprises Ltd & Kintyre Pacific Holdings Ltd

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: Pinedale Enterprises 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 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 (the Site) as a rural residential location. Consideration of the location criteria set out in Appendix 1 of the RRS has been made in Appendix B to this submission.

Submitter /Background

Pinedale Enterprises Ltd & Kintyre Pacific Holdings Ltd ('the Submitter') owns 69 ha of land at Rolleston located between Two Chain Road and Main South Road and bounded by Walkers Road to the west (as shown on the plan attached as Appendix A) ('the Site'). The land is zoned Rural Inner Plains and is currently used for grazing purposes.

The Site 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 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.

A possible rural residential subdivision layout for Stage 1 is attached as Appendix C. Runners Road has been repositioned further north to facilitate public walkway access within the 40m noise/landscape buffer setback, as it is understood this is Council's preference.

The Submitter also made submissions on the Land Use Recovery Plan (LURP) seeking that it be rezoned for residential purposes, and used for affordable housing, including housing relocated from the CERA (Canterbury Earthquake Recovery Authority) red zone. That submission was not accepted by CERA.

Rural Residential Strategy

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

Reticulated services

In this case the Site, reticulated services are already available in Two Chain Road and 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

The location of the Site adjoins the Rolleston existing township and LZ land 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.

In addition, there are opportunities to provide cycle/walkway connectivity within the 40m noise/landscape buffer with SH1, linking to Walkers Road.

Constraints

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 Preliminarily Site investigation will be required to be undertaken in conjunction with any future development of the Site).

Preliminary development concepts for the Site include a noise and landscape buffer along the SH1 frontage to mitigate any potential noise effects with the SH. A minimum 40m dwelling setback will apply in accordance with NZ Transport Agency standards. A possible

Having regard to the above, there are no known constraints to developing the Site.

Landowner intentions

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

Given the Site meets the pre-requisites sets out in the RRS for identifying preliminary sites suitable for development, and given the Site meets the location criteria set out in Appendix 1 of the RRS, it is considered that this it is suitable for rural residential development

Land Use Recovery Plan

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 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 CERA. 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.

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."

Making provision for rural residential in peri-urban locations is most efficient in terms of transport efficiency, due to proximity to urban services. The Site could yield around 115 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.

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 estimates that the market can sustain 120 rural residential lot sales per annum over the 35 year period 2007-2041, a total of 3600 lots between 2011-2041; or 1680 between 2014-2028.

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.

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).

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.

Task 18: Selwyn District Council of the LURP requires SDC to amend its district plan to the extent necessary to include zoning and outline development plans in accordance with chapter 6 of the Regional Policy Statement for the following greenfield priority areas shown on map A, appendix 1:

'viii. Implementation of SDC rural residential development strategy.

Details of any changes and variations to be provided to the Minister for Canterbury Earthquake Recovery within 6 months of Gazettal of this Recovery Plan for the Minister to determine any public process required to give effect to those amendments.'

We request that SDC recommends to the Minister of Earthquake Recovery that the Site be rezoned as L3 under the provisions of the CER Act with no further public process required. Detailed District Plan amendments for the proposed L3 zoning, including an ODP, can be supplied.

The RRS hearing process is sufficient to consider the merits of the rezoning proposal.

Review of the RRS

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.

Unlike District Plans, there is no ability to seek changes to the RRS. It is therefore essential and necessary under principles of 'natural justice' that the provisions of the RRS are regularly reviewed and updated.

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 to "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).

Relief Sought

- That SDC adopt the Draft RRS as the Final RRS subject to the inclusion of the Site as a suitable for rural residential; and if preferred by the Council, also Lots 1 and 2 DP 305466 and land the two eastern blocks between Two Chain and SH1 bounding Railway Road to the east.
- Add an additional section to the RRS called '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)
- 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 with the requirement for an ODP 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.
- Such other relief as will give effect to the intent of our submission.

Conclusion

The Submitter considers that the Site is a suitable area for rural residential development on the edge of Rolleston. This Site will provide appropriate consolidation and enable the development to be integrated with Rolleston. 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 Rolleston 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.

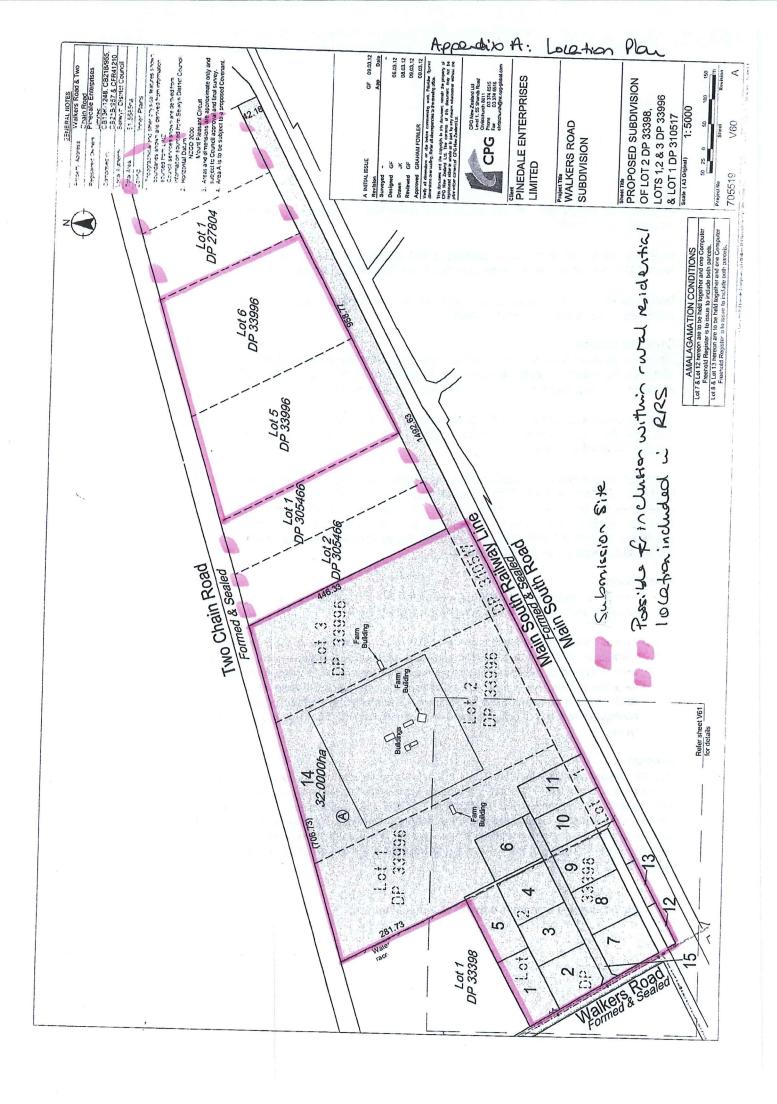
5. Signed:..... 7 5 6 6 6 6 ... 3 March 2014

6. Address for service of submitter:

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Appendix B: Assessment Against RRS criteria for Rolleston

Rural Residential Strategy (2013) Location 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	Rolleston	Proposed Site
Chapter 6 of the CRPS (LURP)		
Located outside the identified priority areas for development and existing urban areas	С	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	С	Adjoins (on opposite side of SH1) the Living Z zone and Rolleston Prison with existing reticulated services in Walkers and Two Chain Roads, 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	Two Chain Road and Walkers Road are arterials and the Site adjoins SH1 to the south. Preliminary development concepts limit the number of road connections onto the arterials and enable lots to be serviced internally from within the Site rather than directly onto the arterials. A noise buffer and landscape setback is proposed from SH1 and no access from SH1. T
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	SS	The site is located outside the 50 dBA Lnd noise air contours

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	С	The proposal is not located such that it could compromise the operational capacity of the West Melton Military Training area or the Burnham Military Training Camp.
Support existing or upgraded community infrastructure and provide for good access to emergency services	С	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	There will be no adverse effects on neighbouring rural land uses which are in reality 'semirural lifestyle' type activities due to the location in close proximity to Rolleston. With respect to the existing horse training track on Lot 1 DP 305466, given the predominate easterly wind any dust will affect the adjoining rural property to the west excluded from the proposed rural residential location as well (but these sites can be included if this is Council's preference). Also the Submitter will fund the spreading of lime chip on the track to further mitigate any potential dust nuisance.
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 known significant ecology 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	There are no known sites of significance to tangata whenua identified on the Site
Avoid adverse effects on existing surface water quality	NA	This Criteria does not apply.
Integrate into, or consolidate with, existing settlements	С	The proposal is located adjoining the LZ zone to the south of Rolleston and is able to be integrated and consolidated with the

	-	Town, in accordance with 'connectivity' proposals outlined in the Rolleston Structure Plan, including a localised grade separated pedestrian/cycle crossing connecting land north of SH1 with the town centre over the State Highway and Railway line.
Development site supports the development of an ODP and is not seen as a transition to full residential forms of development	С	An ODP will be developed for the Site which ensures a rural residential form and appropriate boundary treatments to secure a rural residential identity.
Rural residential form, function and character		
Avoid locations that are obvious residential growth paths	С	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 CERA.
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	С	The proposal adjoins the Living Z zone (on the opposite side of SH1) and directly adjoins and is able to consolidate Rolleston township.
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 to2 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 densities sought by this criterion can be achieved on this site. The ODP design will ensure the anticipated RRS rural residential form, function and character is achieved, including an appropriate degree of 'ruralness' for all rural residential lots. The potential yield is around 115 rural residential lots. There will be a generous landscaped open space buffer to SH1 to the south which ensure and open outlook in this direction. Land on the north (opposite) side of Two Chain Road, which has a long frontage with the Site is predominantly existing 4 ha blocks.
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	SS	The development of the Site does not compromise the quality of ecosystems or indigenous biodiversity, and it ensures that the rural residential development is able to meet the requirements of this criteria.

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. 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	Rural residential development on this Site will utilise the existing roads, proposed SH1 noise and landscape buffer setback to created definitive boundaries. There are existing shelterbelts which can be retained along the east boundary with Lot 2 DP 305466 and Lot 1 DP 27804. Appropriate edge treatment such as shelterbelts can be planting along the boundary with Lot 1 DP 50466 (which are not included within the Site). The proposed noise/landscape buffer with SH1 contains mature gum trees which will be retained to maintain appropriate visual outlook from
		SH1. Similarly, existing planting along the Two Chain Road frontage (pines and macrocarpas) can be retained.
Landscape values		Trontago (pintos ana masicosarpas) can bo retamos.
Discernibly logical boundaries determined by strong natural or physical features	С	See discussion under bullet point immediately above.
Exclude land required to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch	SS	The open space character along the SH frontage will be maintained by the proposed noise and landscape buffer.
Protection of natural features, significant trees and vegetation	SS	Any existing vegetation in sound condition will be retained where possible.
Manage the amount of households within single locations to avoid the collective visual effects of intensified land use	С	The Site can accommodate around 115 rural residential households (5000m² average) or 57hh (average 1 ha). This is 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.
Address the constrains to development identified in the Landscape Constraints Map prepared by Andrew Craig Landscape Architect (see Appendix 1 RRS13)	ss	None would appear to apply to the Site.
Locations to adjoin Township boundary's but have an ability to achieve a degree of 'ruralness' as a consequence of adjoining land use and natural attributes	С	'Ruralness' can readily be achieved by ODP design which will include a mix of lot sizes including some larger ones able to support some productive activity, such as horse grazing.

ROLLESTON ENVIRONS STUDY AREA CRITERIA		
Urban from 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 Rolleston Structure Plan and the Growth of Township objectives and policies of the District Plan	С	The Site adjoins urban limits. It is outside the future urban areas identified in the RSP.
Rolleston has capacity to support an increased population base within rural residential living environments as it is an identified Key Activity Centre that has the community infrastructure, services and business areas to support a large self-sustaining community	С	Achieved
Preclude rural residential development north of SH1	ss	Achieved - Whilst the Site is north of SH1, it can be well

and SIMTL that would be severed from Rolleston and contribute to poor integration and connectivity with the Township (refer to Appendix 2 – Map 28)		integrated with and connected to the main Rolleston township, particularly once the overbridge with dedicated cycle and walkway facilities is in place. A Park n Ride is also proposed at the SH close to the SDC offices. These facilities will be a similar distance from the Site as they are from the existing township areas.
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 Rolleston (refer to Appendix 2 – map 28)	SS	Achieved. There will be a generous noise and landscape setback from SH1. The Site runs parallel with the existing township boundaries on the opposite side of SH1 so will not impact or result in any change to the position of the Rolleston 'gateways'.
Avoid locations that may contribute to the long term coalescence of Rolleston with the Townships of Lincoln, West Melton and Springston (refer to Appendix 2 – Map 28)		Achieved. There is no risk of coalescence. The Izone business area is located between the Site and West Melton.
Rural character and productivity		
Support locations that maintain appropriate separation from the Intensive Farming Activities legitimately established on the periphery of Rolleston (see Appendix 2 – Map 4)		Achieved
Maintain the visual distinction and amenity contrast between the rural periphery of Rolleston and the urban forms of Prebbleton, Lincoln, Springston, West Melton and Christchurch City (refer to Appendix 2 – Map 28)	С	Achieved – the Site's rural zoning is an anamoly when its location in relation to the existing urban areas of Rolleston is considered i.e is effectively within the 'arc' of urban Rolleston and only appears to be excluded from full urban development due its position on the north side of SH1. Lower density rural residential development is an ideal 'transition zoning' to the existing 4 ha blocks north of Two Chain Road.
Preserve the rural character and productive capacity of large rural land holdings and the Rural (Outer Plains) zoned land to the south of Rolleston (refer to Appendix 2 – Map 28)	SS	Achieved

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 and reticulated water and wastewater networks (refer to the 5Waters Activity Management Plan and Transportation Activity Management Plan)		Achieved
Avoid locations that may undermine the operation of the strategic Infrastructure referenced in the District Planning Maps and the associated Study Area Maps contained in Appendix 2 – Map 4:		Achieved – the site is separated from Rolleston Prison by Lot 1 DP 33398 (approximately 8 ha) which provides an appropriate buffer and includes an existing pine plantation along the Walkers Road frontage. A landscaped noise buffer will avoid any adverse
NZ Defence Forms Burnham Military Camp (DE1), Rolleston Prison (MC1), Pines Wastewater Treatment Plant and East Selwyn Sewer Scheme (D403 & D411), Rolleston Resource Recovery Park (D412), I-Zone Industrial Park, Weedons Cemetery (D178), Weedons Domain (D203), Weedons Primary School (ME25), McClelland Road reserve (D125), Council water wells on Wards Road (D92), SH1 four-laning and CSM2, SIMTL, Christchurch International Airport Noise Contour, Youth Justice Residential Centre (MS1) and Transpower high voltage transmission lines		effects due to proximity to SH1.
Natural hazards		
Avoid land that is subject to the high groundwater table to the south of Rolleston (see Appendix 2 –Map 19)	SS	Achieved
Environmental, cultural and heritage values		
Avoid Land that may compromise the health, longevity or setting of the register Protected Tree located on Weedons Road to the north-east of Rolleston (T88) (See Appendix 2 – Map 12)		Achieved

Consider the extent to which any locations may reduce the productive capacity of Class I and II versatile soils on the periphery of Rolleston (see Appendix 2 – Map 21)	The Site is light Lismore stoney silt soils. There is no irrigation rights for the property. Farming options are limited by the lightness of soils where no irrigation is available. They are not versatile soils.
Investigate the environmental impacts of facilitating rural residential growth on land that may be potentially contaminated, including sites identified to the east, south-east and north-west of Rolleston (see Appendix 2 – Map 12)	While there are no known HAIL activities on the site, appropriate investigations will be taken out prior to any extensive residential development of the site in the near future.

Appendix C: Possible Rural Residential Subdivision (Stage 1 only)					

