

1 May 2012

Submission on Proposed Plan Change 32 – Selwyn District

Submission on behalf of RW and PI Telfer, Conifer Grove Trust (R and A Taylor), and Orion NZ Ltd.

We refer to our previous submissions dated 17 February 2010 and 23 February 2010 in relation to the now withdrawn Rural Residential Plan Change 17.

We respectfully submit the following in relation to the publically notified Plan Change 32;

1. 200 allotments over three periods up to 2041 (600 in total). The question needs to be asked as to why the specific number of allotments and why over the timespans dictated?
The Council cite the Regional Planning Strategy – Chapter 12 A as being now set in legislation through CERA and the government emergency planning facility. The Council would have previously informed the Regional Planning Strategy, so in essence the numbers and timeframe are the Council's recommendations. In our meeting with Councils' planning officer, the comment was made about Council being 'ultra vires' should they deviate from this legislation, and of course this would be so. However, this does not preclude the Council from considering what strategy it should undertake given the changed environment post earthquake. The Council needs a more proactive approach and to treat the legislation as a 'holding pattern' until further debate and subsequent dialogue can be had around whether the numbers and timeframes are an appropriate way to manage the expected growth in the district.
2. The Council in Plan Change 32 talks about the need to plan for sustainability, and that this Plan Change is not about meeting the market needs. Interestingly, at the moment Council has a marketing plan called "Discovering Sensational Selwyn" – a campaign to attract new residents to Selwyn District. This seems at odds with Councils' rhetoric, that planning is not about meeting market needs. People displaced post earthquake, are heading to the south-west of Christchurch. By way of example we constantly receive unsolicited phone calls; letters dropped in our letterbox and have people calling in to inquire if we have land available for sale. This has increased post earthquake, and predominantly they are keen to purchase land on the south-east of the Prebbleton Township. Most recently we had a phone inquiry from a couple who had been told by Council that we were subdividing!
3. Our submission is for Council to consider a different approach to that put forward in proposed Plan Change 32. Rather than the allotment of 200 rural residential sections over each of the three timespans to 2041, the full 600 allotments should be made available on adoption of the Plan. This would help meet the market needs post earthquake while still sustainable to the infrastructure available. It needs to be acknowledged that post-earthquake, the planning environment has dramatically changed. The current thinking needs to accommodate this new landscape and allocating the 600 allotments now would go some way towards this. There are various mechanisms for this to be achieved, such as through deferred zonings; but there needs to also be a mechanism to bump land already allocated

for households to a later development sequence if there is no intention to develop that land within the 2007-2016 sequence.

Under Plan Change 17, there was essentially an allocated approach. Under the proposed plan change, it is still arguably an allocated approach in terms of numbers and time, but more of a 'first up, best dressed' approach. This will encourage a number of property owners and developers to spend upwards of \$100k + each, with no guarantee of even 'getting into the line' for their application to be considered. To our mind, this is an allocated approach just in a different guise and in reality resources will be wasted in the process.

How will Council manage developers or property owners with large holdings, essentially seeking and being granted allotments that will significantly reduce the available allotments? This has been the case with the two recent Plan Changes (Plan Changes 8 & 9) which have already taken 148 of the 200 allocations for the first development sequence up to 2016. We are essentially already on the 'back foot' so to speak! This does not seem a reasonable approach to town planning.

4. There are a number of policies proposed in Plan Change 32 which we consider need to be clarified to make it clearer that our land is suitable for rural residential development. These are policies relating to the direction of growth along Springs Road and policies relating to development on one side of an arterial route. Specifically these policies are included in amendment 43, 91 and 92.
5. Amendment 43 and any related provisions and explanations should be altered to make provision for rural residential development on both sides of a Strategic Road where both sides of the road already have a Living Zoning and all other matters indicate that the land is suitable including safe access. Whilst it is appreciated that this policy was developed in respect to more intense living environments, this policy should not be used as a technical knock out for sites like ours to be developed for rural residential activities.
6. Amendment 91 and 92 specify that further north-south elongation along Springs Road is inconsistent with a number of the Township consolidation and form policies. However, it is not clear in these policies what is meant by "north-south along Springs Road" (amendment 92) and "north or south of the existing Living 1 Zone boundaries" (amendment 91) as Springs Road is not oriented north-south. Whilst it is appreciated that this policy was developed in respect to more intense living environments, the Council should use its scope within this plan change to clarify what is meant, to the extent it can do, in respect to intensification of land to Living 3 densities.

We thank you for considering our submission.

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