

To: Selwyn District Council
Attn: Craig Friedel
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Full name of submitter: Canterbury Regional Council

This is a submission on the Draft Selwyn 2031 District Development Strategy

1. The specific provisions of the Draft Selwyn 2031 District Development Strategy that my submission relates to are:
The document in its entirety.

2. My submission in SUPPORT / ~~OPPOSITION~~ is:

Overall the Canterbury Regional Council (CRC) supports and commends Selwyn District Council for preparing this draft strategy. It is an example of a proactive and strategic approach to managing urban and population growth, associated infrastructure provision, pressures on rural assets and the natural environment, and other resource management issues facing the district. This approach is consistent with the outcomes sought by Chapters 5 and 6 of the Canterbury Regional Policy Statement (RPS).

Whilst CRC supports the Draft Selwyn 2031 District Development Strategy it submits that the Strategy could be further improved by the following amendments.

Strategic Direction 1 – A More Sustainable Urban Growth Pattern

Table 1.1; 3 – Hazards

The strategy recognises the need to review the DP to avoid high hazard areas but is silent on other key parts of Chapter 11 to the RPS, including:

- Mitigation of flooding effects (1 in 200 year floor levels) – areas need to be mapped and DP amended accordingly
- Identifying and protecting natural features such as ponding areas and flood plains and to also reduce flood risk in low lying catchments and reduce development in flood prone areas.
- Port Hills geo-hazards
- The exacerbation of natural hazards through climate change
- Managing the effects of liquefaction post 2016.

It is recommended that a wider range of hazards, including those mentioned above, are recognised in the action column so that appropriate responses/provisions can be incorporated within the District Plan.

Table 1.1; 5 - Recognition of Tangata Whenua Values

The Strategy should include mention Papakainga housing and Maori Reserves as part of the strategic approach to managing urban growth.

Table 1.1; 6 - Avoid the Urban Development of High Quality Soils

This should be extended to other forms of development such as rural-residential

Table 1.2; 8 – Rezoning of Land

Support the action to amend the DP. DP amendment should provide direction:

- that 80% of urban growth is to occur within the UDS part of the district (where demand and infrastructure exists),
- West of this line, 80% of remaining urban growth shall be directed to the remaining towns subject to provision of appropriate infrastructure to support that growth whilst maintaining water quality etc.

Table 1.2; 10 – Location of Urban Development

Township network – consider amending district plan to ensure that urban activities do not occur outside of existing urban areas and priority areas (as shown on Map A and required by Chapter 6 of the RPS) within Greater Christchurch part of district.

Table 1.3; 12 – Hazards

This should be extended to infrastructure that will be vested to the district council.

Table 1.3; 13 – Wastewater

It is essential that future growth is linked to the effective and efficient provision of services, including the reticulation of wastewater. CRC supports SDC's recognition that any growth in towns such as Darfield, Springfield and Leeston and so on, must be linked to provision of reticulated wastewater and drinking water supplies along with the protection and improvement of water quality generally. This is an approach being advanced through proposed Variation 1 to the Land and Water Regional Plan which expects a high standard of wastewater treatment and disposal [Best Practicable Option] and compliance with limits on nutrient leaching. Reference should also be made to the need for investigations for improved wastewater treatment and disposal for the Lower Selwyn Huts community.

Table 1.3; 14 – Water

Support SDC's recognition that any growth in towns such as Darfield, Springfield and Leeston must be linked to provision of reticulated wastewater and drinking water supplies along with the protection and improvement of water quality generally.

Table 1.3; 15- Stormwater

Support the Council requiring low impact design “sustainability” principles for new developments, through DP amendments and/or the use of stormwater bylaws. However, CRC would question the implementation target “By 2018/2019” – Selwyn is already experiencing significant levels of development and ensuring that new developments deliver on environmentally sustainable design principles should be a priority. There may also be changes in groundwater levels from the addition of water to the catchment through the CPW Scheme and retirement of groundwater takes in the upper plains. Though expected to improve lowland stream flows, changes in groundwater may need to be taken into account in the ISMPs.

Table 1.3; 16 – Transport

The strategy currently focuses on ensuring the transport network supports new growth and links between the towns an approach that is supported by CRC. Encouraging consolidated urban form and development maximises the opportunities for non-car modes of transport and these should be encouraged wherever possible. CRC would like to see more recognition within the Strategy for:

- reducing dependency on use of private car by promoting active and public transport modes
- the role of managing the distribution of land use on promoting active and public transport modes
- the introduction of an Integrated Transport Assessment requirement into DP as required by Chapter 6 of the RPS
- other transport partners (other than NZTA) e.g. reference to working with CRC on public transport provision for growing towns
- actively promoting public transport and non-car uses

Table 1.4; 19 – Urban Form

Support the issue raised under item 19 and note that a disjointed or elongated settlement pattern will also discourage and/or make provision of public transport more difficult.

Strategic Direction 2 – A More Prosperous Community

Key Activity Centres table on Page 48 and Table 2.1; 22 – Activity Centres

The strategy provides for a network of centres (an approach which is supported CRC) across the district and not just within the UDS area, but in so doing it identifies other Key Activity Centres (KACs) over and above those identified in Chapter 6 of the RPS. The KACs identified by the RPS are Rolleston and Lincoln. The term KAC has a very specific meaning in the RPS and its application to other settlements may cause some uncertainty as to their status. The identification and classification of townships into a hierarchy that reflects their role and function is supported but should use different terminology to the RPS in order to avoid any confusion.

Transport – page 48-49

Could also include reference to the Regional Public Transport Plan

Table 2.2; 23 – Housing Choice

Providing for variety and choice might need changes to the DP to allow for variation in lot sizes and house styles

Table 2.2; 25 – Support for Activity Centres

Support the need for an Area Plan for Darfield which should also be subject to the provision of appropriate water supply and waste water infrastructure

Strategic Direction 3 – A great Place to Live

Table 3.1; 36 – Heritage

Strategy has good, positive focus on buildings but is silent on historic and cultural landscapes. Given the Strategies aspirations as set out in section 2, recognition should be given to the cultural value of Te Waihora (as per Variation 1 to Land and Water Regional Plan). The Council should consider whether it wishes to initiate an assessment of the historic cultural and historic heritage landscape inclusion in the District Plan.

Table 3.1; 41 – Subdivision Quality

Support appreciation of need for strategic approach to ensure comprehensive transport solutions – based upon strategic assessment of township networks. In addition to consideration of pedestrians and cyclists, section could be further improved by direct reference to public transport and/or accessibility.

Table 3.1; 42 – Medium Density Housing

Support the intent seeking to deliver high quality medium density housing, however as currently expressed it appears to assume that medium density housing is more problematic than traditional housing, yet it can equally contribute to amenity and street scene. Suggest rewording to focus on positive outcomes sought by strategy rather than potential negatives to be avoided.

Strategic Direction 4 – A Strong and Resilient Community

Table 4.1; 43 – Existing Community Facilities

Strategy should also be seeking/encouraging means to enable community facilities within KACs (as per Chapter 6 of the RPS), which may require a change to the District Plan

Strategic Direction 5 – Sustainably Managing our Rural and Natural Resources

Table 5.1; 49 – Te Waihora / Lake Ellesmere

Actions should include that proposed Variation 1 to the Land and Water Regional Plan includes the designation of a Te Waihora Cultural Landscape/Values Management Area. This reflects the significance and concentration of mahinga kai, wāhi tapu and wāhi taonga sites associated with the lake. Consenting of certain activities within this area will need to consider any adverse impacts on cultural sites. Support commitment to improving ground and surface quality and reduce impact of development on spring fed streams and Te Waihora.

Table 5.1; Action 50 – Rivers within the District

Amend actions to include implementation of the Zone Implementation Programme (ZIP) and ZIP Addendum

Table 5.1; 52 – Loss of Biodiversity in the District,

Support the Council's suggestion to develop a Biodiversity Strategy to co-ordinate both regulatory responsibilities and non-regulatory responses to biodiversity loss. CRC supports the action to prioritise regulatory approaches in relation to biodiversity.

Table 5.1; 53 – Water Races

The issue should also highlight that there are potential flow and ecological benefits of closure e.g. for the Hororata River. This issue could also be more specific and reference the Upper Ellesmere Water Race Scheme if this is the only one being reviewed.

Table 5.2; 56 – Impact of Central Plains Water Scheme (CPW)

This section identifies the impacts of CPW will be land use intensification, increased employment and associated pressure to increase rural accommodation. The suggested Area Plan for Darfield should include consideration (and SDC actions) on how to manage the potential for increased pressure on drinking water quality (e.g. from nutrients (especially nitrogen) and microbiological contaminants). It should also be recognised that the Land and Water Regional Plan (Variation 1) will be the primary means of control through a nitrogen limit for CPW and new emphasis on Farm Environment Plans.

3. I WISH / ~~DO NOT WISH~~ to be heard in support of my submission
4. If others make a similar submission, I will consider presenting a joint case with them at a hearing
- 5.

Signature of submitter

Date: 6th June 2014

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