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8 February 2011

Planning Department
Selwyn District Council
PO Box 90
Rolleston 7643



Resource and Environmental Management Consultants



File AG012

Dear Sir/Madam

PROPOSED PLAN CHANGE 12 –SUBMISSION BY AGRESEARCH LTD

Please find enclosed a submission made on behalf of AgResearch Limited to proposed Plan Change 12 to the Selwyn District Plan.

Yours sincerely,
Resource Management Group Limited

A handwritten signature in blue ink, appearing to be "D. Millar".

Darryl Millar
Director

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Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PLAN CHANGE NO.12 TO THE
PARTIALLY OPERATIVE SELWYN DISTRICT PLAN***Clause 6 of First Schedule, Resource Management Act 1991***To:**

Selwyn District Council (SDC)
2 Norman Kirk Drive
Rolleston

NAME OF SUBMITTER:

AgResearch Limited
(Note address for service below)

SUBMISSION BY AGRESEARCH LIMITED (AGRESEARCH)

Pursuant to Clause 6 of the First Schedule of the Resource Management Act, AgResearch hereby lodges a submission to Plan Change 12 (**PC12**) to the Partially Operative Selwyn District Plan (**the Plan**).

AgResearch is a Crown Research Institute (CRI) wholly owned by the New Zealand Government and incorporated in 1992. The Lincoln facility, including nearby research farms, is one of its four campuses throughout New Zealand. The Corporate Office is located on the Ruakura Campus in Hamilton.

AgResearch is an independent research and development company and the Lincoln research facilities focus on biocontrol and biosecurity, land management, plant breeding, seed technology, wool and skin biology and issues facing the textiles sector.

AgResearch's main administration offices, research facilities, laboratories and related buildings are located on the south-east corner of the Springs Road/Gerald Street intersection within the Business 3 zone. AgResearch owns additional landholdings in the Inner Plains and Outer Plains rural areas near the Lincoln Township.

This submission focuses primarily upon the impact of PC12 on AgResearch's landholdings in the Business 3 Zone, as well as potential impacts on rural landholdings associated with the research facility.

In terms of its functions and responsibilities, and the importance of these as a matter of national and regional significance, AgResearch makes the following submissions on the Plan, including the specific comments and relief sought in **Attachment 1**, which forms part of this submission.

In broad terms, AgResearch, while generally supportive of the intention behind PC12, opposes the change in part in relation to the matters outlined below.

THE SPECIFIC PROVISIONS SUBMITTED ON:

The specific provisions of PC12 that AgResearch's submission relates to are as follows:

Amendments to the Rural Volume pertaining to roading hierarchy and access

- Proposed Policies B2.1.1, B2.1.2, B2.1.3, B2.1.4(a) & B2.1.4(b) and B2.1.12.
- Rules 4.5.1.6 & 4.5.1.8

Amendments to the Township Volume pertaining to roading hierarchy and access

- Proposed Policies B2.1.1, B2.1.2, B2.1.3, B2.1.4(a) & B2.1.4(b)
- Rules 17.2.1.7 & 17.3.6.

Amendments to the Rural Volume pertaining to car parking standards

- Rule 4.6.6

Amendments to the Township Volume pertaining to car parking standards

- Rule 17.5.1
- Parking standards in Appendix 13, particularly changes to:
 - *Table E13.1(a) — Minimum Parking Spaces to be Provided.*
- Rule 17.7.2

Other Matters

- Recognition of regionally and nationally significant facilities such as the University in Policy B2.1.25 (Township Volume).

NATURE OF SUBMISSIONS:

AgResearch **opposes PC12 in part**. AgResearch are generally supportive of the intention behind PC12, broadly speaking to integrate land use and transport, safety and efficiency, future transport networks, parking and road hierarchy. However, it is the specific provisions proposed and how they will impact upon the efficient functioning of an established and recognized research facility that is opposed.

DETAILS OF SUBMISSIONS:

Introduction

The specific provisions which AgResearch oppose, the reasons for the opposition, and the relief sought to address the points raised are contained in Attachment 1. The following sections contain the context within which the more specific comments in Attachment 1 are made, and are intended to provide a broad overview of the rationale behind some of the specific opposition.

Planning Context

AgResearch understands that SDC must give effect to the Regional Policy Statement (RPS), and have regard to any proposed changes to the RPS.

AgResearch note that a number of recent Regional and District planning documents have noted the importance of Crown Research Institutes and have stated that specific consideration needs to be given to the future use of land in proximity to Crown Research Institute landholdings so as not to compromise their efficient and continued use.

For example, the Greater Christchurch Urban Development Strategy (“UDS”)¹ states the following:

- *[n]ational and regional assets will be protected including...the agricultural research centres and farms as these are essential infrastructure².*
- *Greater Christchurch also contains a number and range of research centres and agricultural research farms located in close proximity to each other that are of strategic importance from a local and national perspective. Their retention and continued operation is of importance to the regional economy³.*

Further, the UDS outlines several ‘Key Approaches’ which include the need to:

- *“[m]anage adverse effects on strategic nationally and regionally important research centres and farms.”*

These views are being codified into the Canterbury Regional Policy Statement (RPS) by way of Proposed Change One (“PC1”). Whilst PC1 has not been made an operative component of the RPS, Environment Canterbury has released its decision on submissions. Appeals on PC1 are such that it is considered that PC1 will not be made fully operative for some time; however, due consideration should be given to this document as is already reflected in some of the newly introduced Policies in PC12, and as discussed in the section 32 report accompanying PC12.

Additional guidance is provided at the district level in SDC’s Lincoln Structure Plan (“LSP”) and the District Plan, which reflect the significance of AgResearch and seek to ensure the continued efficient operation of its facilities.

It is within this context that some of the specific provisions of PC12 are not considered to be **the most appropriate way** to achieve the objectives of the Plan, nor **give effect** to higher level planning documents, as is required under the Resource Management Act 1991.

Business 3 Zone

As noted in the Plan, the Business 3 Zone includes Lincoln University and the research organisations located at Lincoln. As such, the zone is **specific** to Lincoln Township, and to these **established** activities.

AgResearch wish to emphasise to the Council that in considering PC12, it has to be established that the provisions of PC12 are the **most appropriate way to achieve the Plan’s objectives, having regard to the efficiency and effectiveness of such provisions**.

AgResearch consider that further consideration needs to be given to Objective B3.4.2 (Township Volume):

“A variety of activities are provided for in townships, while maintaining the character and amenity values of each zone.”

This objective is supported by Policy B3.4.6, which is specific to the Business 3 Zone and seeks:

¹ Greater Christchurch Urban Development Strategy & Action Plan, 2007 (SAP)

² SAP, p.25

³ SAP, p.93

“To provide a Business 3 Zone to accommodate specialist agricultural research, education and associated business activities in surroundings that maintain the environmental quality needed to undertake these activities; and avoids potential ‘reverse sensitivity’ effects with other activities”.

The explanation of this policy includes the acknowledgement that the effects of some of the research and business activities in Lincoln are unique in the Selwyn District and that the Plan recognises this uniqueness with a specialist zone to provide the character, quality of the environment and amenity values specific to these activities.

AgResearch do not support many of the provisions outlined in Attachment 1 to this submission, on the basis that they **do not have adequate regard for the specific and established character and amenity values of the Business 3 Zone**, and are therefore not the most appropriate method for achieving the objectives of the Plan and the purpose of the RMA **as they pertain to the Business 3 Zone**.

It is important to make the distinction that AgResearch do not oppose many of the identified provisions as they apply to the District generally (except where otherwise noted in Attachment 1), but as they apply to the Business 3 Zone, without due consideration for the established character of the zone.

AGRESEARCH LIMITED SEEKS THE FOLLOWING DECISION FROM SELWYN DISTRICT COUNCIL:

RURAL VOLUME:

- 1) **Amend** proposed Policies B2.1.2, B2.1.3, B2.1.4(a), B2.1.4(b) and B2.1.12, Rule 4.5.1.6 and 4.6.6 as set out in Attachment 1.
- 2) **Delete** proposed Rule 4.5.1.8.

TOWNSHIP VOLUME:

- 3) **Amend** proposed Policies B2.1.2, B2.1.3, B2.1.4(a), and B2.1.25, Rule 17.2.17 and 17.3.6 as set out in Attachment 1.
- 4) **Delete** proposed change to the minimum parking spaces to be provided for ‘Research facilities’ in ‘Table E13.1(a) – Minimum Parking Spaces to be Provided’.
- 5) **Delete** proposed Rule 17.7.2 and amend the corresponding ‘Reasons for Rules’ as set out in Attachment 1.
- 6) Any other changes required to give effect to the relief sought.

HEARING

AgResearch Limited wishes to be heard in support of its submission. If others make similar submissions, AgResearch may be prepared to consider presenting a joint case with them at any hearing.

Submission signed for and on behalf of **AgResearch Limited**:



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Darryl Millar
Director
Resource Management Group Ltd

Dated: 8 February 2011

Address for service of submitter:

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ATTACHMENTS

- (1) Submission on Specific Provisions including explanation and relief sought.
- (2) Example of potential impact of proposed rules on AgResearch's land holdings.

ATTACHMENT 1

Submission on Specific Provisions including explanation and relief sought

Provision	Support / Oppose	Comments	Relief Sought
RURAL VOLUME Policies B2.1.1.1 – B2.1.4(b) Policy B2.1.1 <u>Apply a road hierarchy classification in Selwyn District to recognise the different functions and roles of the Districts roads.</u> Policy B2.1.2 <u>Manage effects of activities on the safe and efficient operation of the District's existing and planned road network, considering the classification and function of each road in the hierarchy.</u> Policy B2.1.3 <u>Recognise and protect the primary function of Manage roads classified as Strategic State Highways or Arterial Roads in Appendix 9, primarily to ensure the safe and efficient flow of through traffic en route to its destination.</u> Policy B2.1.4(a) <u>Ensure all sites, allotments or properties have legal access to a legal road which is formed to the standard necessary to meet the needs of the activity considering:</u> – the number and type of vehicle movements generated by the activity; – the road classification and function; and – any pedestrian, cycle, public transport or other access required by the activity. Policy B2.1.4(b) <u>Avoid adverse effects on the safe flow of traffic along State Highways and Arterial Roads from new property access or activities which generate a high level of traffic movements.</u>	Oppose in part	In general terms, AgResearch are supportive of these policies as they pertain to having in place a road hierarchy to ensure an efficient and effective road network, and further support the new Road Hierarchy insofar as it relates to the Proposed amendments to Appendix 9. However, these policies are linked to standards which diminish the ability to gain access to Arterial Roads, and control the amount of vehicle traffic permitted to be generated from an activity. While AgResearch understand the general rationale behind such provisions, they are opposed in relation to the impact that they will have on existing AgResearch facilities, as set out below in relation to the specific provisions to which the policies relate. In addition, Policy B2.1.4(b) raises general concerns about existing high traffic generating activities accessing Arterial Roads. AgResearch are concerned about the application of this policy (and associated rules) to established activities such as the large rural landholdings associated with AgResearch's research activities, More specifically, Proposed Objective B2.1.1 & B2.1.2 both refer to 'an integrated approach to land use and transport planning'. AgResearch have concerns that these policies are imbalanced in relation to their over-emphasis on transportation (specifically arterial roads) without the balancing of land uses, and as such, do not give effect to the higher level objectives. Proposed Issue 6 in PC12 also notes that "One of the core functions of transport infrastructure is to provide safe, efficient and effective transport options. Another is to ensure that both the transport options and adjoining land uses are accessible to the people who use them." AgResearch consider that the proposed methods (Policies and corresponding rules) do not adequately address this issue, but place too great an emphasis on transportation and not enough on land uses and accessibility pertaining to those land uses. The changes promoted by AgResearch to these policies are also considered to be more consistent with the corresponding explanation which notes that arterial roads connect 'important places and activities together' (emphasis added) which would include such important activities as the established research centres and their related activities. Similarly, the explanation goes on to state that "Arterial roads are required to minimize, and control ... property access to ensure they operate efficiently" (emphasis added). Policy B2.1.4(b) as currently proposed uses the word "avoid" which is much stronger than 'minimize'. For the reasons outlined above, and below in relation to the specific provisions this policy pertains to, the proposed policy is opposed, as it does not recognise the existing and unique nature of the AgResearch facilities, nor recognise the identified regional and national importance of these facilities.	Amend proposed Policies as follows: Policy B2.1.2 Manage effects of activities on the safe and efficient operation of the District's existing and planned road network, considering both the classification and function of each road in the hierarchy, <u>and any established land uses of regional or national significance.</u> Policy B2.1.3 Recognise and protect the primary function of roads classified as State Highways or Arterial Roads in Appendix 9, to ensure the safe and efficient flow of through traffic en route to its destination, <u>while recognizing the important access function these roads provide for established land uses of regional or national significance.</u> Policy B2.1.4(a) Ensure all sites, allotments or properties have legal access to a legal road which is formed to the standard necessary to meet the needs of the activity considering: – the number and type of vehicle movements generated by the activity; – the road classification and function; and – any pedestrian, cycle, public transport or other access required by the activity, <u>and</u> – the requirements of the activity itself. Policy B2.1.4(b) Avoid or minimize adverse effects on the safe flow of traffic along State Highways and Arterial Roads from new property access or new activities which generate a high level of traffic movements
Policy B2.1.12 <u>Policy B2.1.12 Discourage Avoid new property access directly on to Strategic the State Highway or Arterial Roads, unless there is no alternative legal access available, or effects on the safe and efficient flow of traffic along the road will be minor.</u>	Oppose in part		Amend proposed Policy as follows: Policy B2.1.12 Avoid new property access for new activities directly on to the State Highway or Arterial Roads, <u>particularly on smaller sites, unless there is no alternative legal access available, or effects on the safe and efficient flow of traffic along the road will be minor.</u> Amend the explanation as follows Policy B2.1.12 prevents seeks to avoid, where practical, additional vehicle access for new activities directly on to roads classified as State Highway or Arterial Roads in the road hierarchy, unless: there is no alternative legal access to the property; or effects on passing traffic will be minor. The Policy and Rule apply to both: – Additional vehicle crossings on existing smaller sites properties; and

Provision	Support / Oppose	Comments	Relief Sought
Rule 4.5.1.6 4.5.1.6 Any <u>access</u> to a <u>State Highway or Arterial Road</u> complies with the following: (a) No <u>legal access</u> is available from another road; (b) The traffic generated through the <u>access</u> to the <u>State Highway or Arterial Road</u> is less than 100 <u>ecm/d</u> [...]	Oppose	This rule is opposed as it does not recognise the existing and unique nature of AgResearch's facilities, nor the regional and national importance of such facilities. While AgResearch understands that the provision would not apply to the continued use of an existing access for existing activities, the rule would apply to any new access off Springs Road, and potentially could be applied if the use of the access increased, e.g. a new research activity in one area becoming more intensive. This would require AgResearch to go through a time-consuming and costly resource consent process, which AgResearch does not consider recognises the importance of their activities. In particular, due to the large size of some of AgResearch's rural landholdings, the rule could be interpreted to mean that where any part of a large site has frontage to a lower hierarchy road, access is required to that road, even if this is completely impractical due to the size and layout of the site. AgResearch considers that other provisions in the Plan (particularly Appendix 10, E10.2) are sufficient to ensure the safe and efficient flow of traffic on arterial roads, including required sight distances, distance to intersections and so on. AgResearch consider that these standards are a more efficient and effective way of achieving the objectives and policies of the Plan, in that they are not more restrictive than needed to meet the Plan's aims. While AgResearch understand the general intention behind minimising vehicle access points on higher speed roads is to emphasise their function as a through road, these roads are designed to have the capacity to absorb additional traffic from new access points, and should continue to operate efficiently where standards are met, without the further regulation proposed in this rule.	– New vehicle crossings created when allotments are subdivided and sold. State Highway and Arterial roads are managed
Rule 4.5.1.8 4.5.1.8 Any site with more than one road frontage to a road that is formed and maintained by Council, shall have access to the formed and maintained (and legal) road with the lowest classification. Note: For example, where a site has frontage to both an arterial road and a local road access shall be to the local road.	Oppose	A number of rural sites owned by AgResearch directly front onto Arterial Roads. The AgResearch research facilities, as noted in the body of this submission, are long established, and are recognised as being regionally and nationally significant. In this regard, they have unique characteristics that are different from general rural activities, or from the types of commercial activities that might be established in the rural zone. The proposed rule is opposed as it does not provide for consideration of the uniqueness of these facilities, and would require AgResearch to go through a time-consuming and costly consent process in order to establish any new access off an arterial road, which may be required in order to continue their current operations. This is not considered efficient or effective given the recognition afforded in higher level plans to this type of activity, and given that the effects, including traffic movements associated with such activities, are part of the character and amenity values associated with the current operations, albeit that the location of an access may change. The rule is also written in such a way that it does not take into account where the practical application of such a rule may create issues – for example, in the case of a large AgResearch-owned site, where the rule would technically require an accessway to be provided off Boundary Road, because the whole site has frontage to this road as well as Springs Road. This scenario is demonstrated in Attachment 2, which shows a hypothetical scenario where a new access might be needed. The attachment shows where the new access would ideally be located (off Springs Road) and where the proposed provisions would require access for it to be permitted (Boundary Road).	Delete proposed Rule 4.5.1.8

Provision	Support / Oppose	Comments	Relief Sought
		Further, the rule, as it is currently drafted, does not provide any exemption to where an existing <u>activity</u> may be established, but an access point may be changed. In this regard, the <u>activity</u> and its associated effects are already established, and the re-positioning or addition of an access will not alter these effects generally. AgResearch consider that in order to ensure that a new or re-positioned access meets the aims of the Plan in regards to safety and efficiency, the Plan's existing and proposed standards in relation to the location of access points (sight distances, distance to intersections etc) is sufficient to meet the intentions of the Plan without being unnecessarily restrictive. AgResearch consider that it is more appropriate that when a <u>new</u> activity is established the approach (favouring lower hierarchy roads) is applied. As such, AgResearch consider that this should be considered at the time of subdivision, or as part of a land use activity for new activities to establish.	
Rule 4.6.6 4.6.6 Any development or redevelopment of a parking area with a total of 40 or more parking spaces shall be a controlled activity, in respect to safety, circulation and access for pedestrians within the site and moving past vehicle crossings.	Oppose in part	AgResearch supports the provision in as far as it applies to new development, recognising that at the time of development of a site, the layout and functionality of a car park, including for pedestrians, is important. However, under the definition of 'redevelopment' this rule would also apply to: "Any alterations to the <u>parking area which change the pedestrian or vehicle circulation within or around the parking area</u>", or changes to "The reconstruction, repositioning, relocation or addition, of <u>more than five parking spaces within any one year period</u>." While AgResearch appreciate that the activity status proposed is controlled, whereby the Council could not decline the grant of the consent, it would still require a consent process to be undertaken for what is essentially minor changes to a car parking area (changes to circulation or alteration of 5 or more spaces). On a site as large as AgResearch's, it would not be unreasonable for minor changes to be made to five parking spaces that would have no bearing on the function and safety of the overall car parking area, and to require consent for such a minor change is not considered to be an efficient or effective way to implement the related objectives. AgResearch note that any changes to car parking areas would need to meet the existing and proposed standards in the plan in relation to dimensions, manoeuvrability, location, availability and so on, and consider that these standards are sufficient to achieve the outcomes sought by the Plan without being unnecessarily restrictive. As such, the rule as it applied to redevelopment is opposed.	Amend proposed Rule 4.6.6 as follows: 4.6.6 Any development or redevelopment of a parking area with a total of 40 or more parking spaces shall be a controlled activity, in respect to safety, circulation and access for pedestrians within the site and moving past vehicle crossings.
TOWNSHIP VOLUME			
Policies B2.1.1 – B2.1.4(b) Policy B2.1.1 Apply a road hierarchy classification in Selwyn District to recognise the different functions and roles of the Districts roads. Policy B2.1.2 Manage effects of activities on the safe and efficient operation of the District's existing and planned road network, considering the classification and function of each road in the hierarchy. Policy B2.1.3 Recognise and protect the primary function of Manage roads classified as State Highways and Strategic Roads in, Arterial Roads in Part E, Appendix 7, primarily to ensure the safe and efficient flow of 'through' traffic en route to its destination. Policy B2.1.4(a)	Oppose in Part	In general terms, AgResearch are supportive of these policies as they pertain to having in place a roading hierarchy to ensure an efficient and effective road network, and further support the new Roading Hierarchy insofar as it relates to the Proposed amendments to Appendix 9. However, these policies, are linked to standards which diminish the ability to gain access to Arterial Roads, and control the amount of vehicle traffic permitted to be generated from an activity. While AgResearch understand the general rationale behind such provisions, they are opposed in relation to the impact that they will have on existing AgResearch facilities, as set out below in relation to the specific provisions to which the policies relate. In particular, AgResearch note that Proposed Objective B2.1.1 & B2.1.2 both refer to 'an integrated approach to land use and transport planning'. AgResearch have concerns that these policies are imbalanced in relation to their over-emphasis on	Amend proposed Policies as follows: Policy B2.1.2 Manage effects of activities on the safe and efficient operation of the District's existing and planned road network, considering both the classification and function of each road in the hierarchy, and the established land uses of regional or national significance. Policy B2.1.3 Recognise and protect the primary function of roads classified as State Highways or Arterial Roads in Part E, Appendix 7, to ensure the safe and efficient flow of through traffic en route to its destination, while recognizing the important access function these roads provide for established land uses of regional or national significance. Policy B2.1.4(a) Ensure all sites, allotments or properties have legal access to a legal

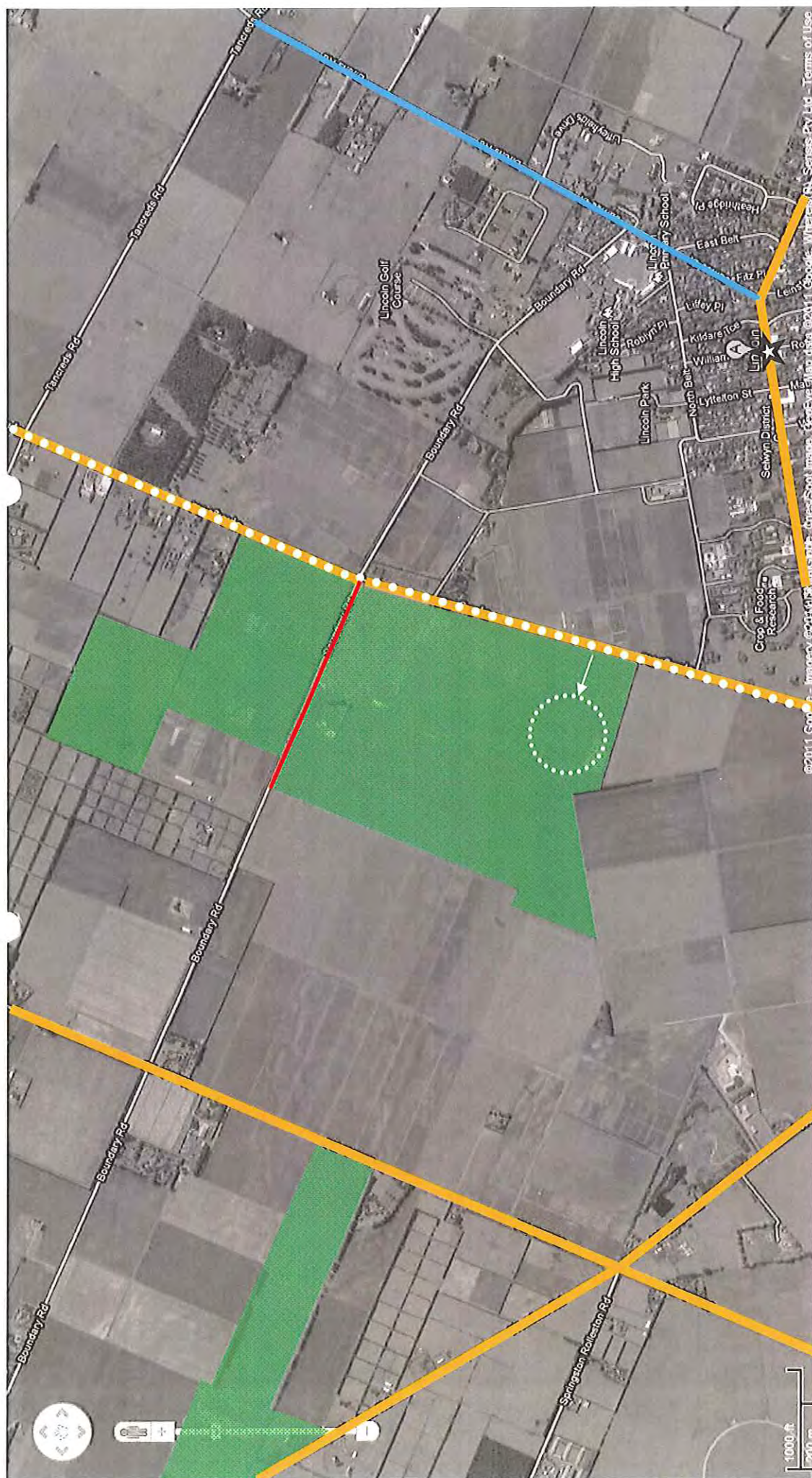
Provision	Support / Oppose	Comments	Relief Sought
Ensure all sites, allotments or properties have legal access to a legal road which is formed to the standard necessary to meet the needs of the activity considering: – the number and type of vehicle movements generated by the activity; – the road classification and function; and – any pedestrian, cycle, public transport or other <u>stock</u> access required by the activity. Policy B2.1.4(b) Avoid adverse effects on the safe flow of traffic along <u>Strategic-Road State Highways</u> and Arterial Roads from new property access, where the speed limit is more than 70 km/hr.		transportation (specifically arterial roads) without the balancing of land uses, and as such, do not give effect to the higher level objectives. Proposed Issue 6 in PC12 also notes that “One of the core functions of transport infrastructure is to provide safe, efficient and effective transport options. Another is to ensure that both the transport options and adjoining land uses are accessible to the people who use them.” AgResearch consider that the proposed methods (Policies and corresponding rules) do not adequately address this issue, but place too great an emphasis on transportation and not enough on land uses and accessibility for those land uses. The changes promoted by AgResearch to these policies are also considered to be more consistent with the corresponding explanation which notes that arterial roads connect ‘important places and activities together’ (emphasis added) which would include such important activities as the established research centres and their related activities.	road which is formed to the standard necessary to meet the needs of the activity considering: – the number and type of vehicle movements generated by the activity; – the road classification and function; and – any pedestrian, cycle, public transport or other access required by the activity, and – the requirements of the activity itself.
Policy B2.1.25 Policy B2.1.2425 Mitigate adverse effects from the construction or maintenance of roads or railway lines on: – adjoining residents; – any waterbodies or ecosystems; or – any special landscape, cultural, heritage or amenity values of the site or area.	Support in Part	The Policy seeks to protect residential areas and environmentally significant areas from the effects of the construction and maintenance of roads, but makes no mention of the impact on regionally/nationally significant facilities such as those owned/operated by AgResearch. AgResearch note that this extensive overhaul of the transport provisions in the Plan is partly proposed in order to give effect to higher level planning documents. AgResearch consider it is similarly appropriate to amend this Policy to include tertiary education and research facilities as a matter worthy of protection from the potential adverse effects of construction and maintenance of roads This would give effect to the higher level documents in which the importance of these facilities both regionally and nationally are noted.	Amend proposed Policy B2.1.25 as follows: Policy B2.1.25 Mitigate adverse effects from the construction or maintenance of roads or railway lines on: – adjoining residents; – any waterbodies or ecosystems; or – any special landscape, cultural, heritage or amenity values of the site or area, or; – <u>nationally and regionally important tertiary education and research facilities.</u> Amend corresponding explanation accordingly.
Rule 17.2.1.7 17.2.1.7 Any site with more than one road frontage to a road that is formed and maintained by Council shall have access to the <u>formed and maintained (and legal) road</u> with the lowest classification. Note: For example, where a site has frontage to both an arterial road and a local road access shall be to the local road.	Oppose	AgResearch’s main research centre is located on the corner of Gerald Street, which is an Arterial Road, and Springs Road, which is a collector road in this location. The AgResearch research facilities, as noted in the body of this submission, are long established, and are recognised as being regionally and nationally significant. Under the proposed rules, a new accessway could not be established off Gerald Street without consent, even if it is impractical to have an accessway off Springs Road. As an example, there is an existing accessway to the site off Springs Road in close proximity to the intersection, which has been known to create traffic safety issues. The rule however, would favour such an access over a more safely-located alternative on Gerald Street. Additionally, AgResearch have concerns that should the nature of the research centre change in future, for example an extension to its facilities, that this rule might be triggered by such a redevelopment, even though the essential characteristics of the zoning and site’s functions would not change. AgResearch question the necessity for this rule to be applied to the Business 3 zone, given its unique zoning, character and amenity values. The proposed rule does not provide for consideration of the uniqueness of these facilities, and would require AgResearch to go through a time-consuming and costly consent process should any new or relocated access be proposed off Gerald Street. This is not considered efficient or effective given the recognition afforded in higher level plans to this type of activity, and given that the effects, including traffic movements associated with such activities, are part of the character and amenity values associated with the current operations, albeit that the location of an access may	Amend proposed Rule 17.2.1.7 as follows: 17.2.1.7 Any site (except within the <u>Business 3 Zone</u>) with more than one road frontage to a road that is formed and maintained by Council shall have access to the <u>formed and maintained (and legal) road</u> with the lowest classification. Note: For example, where a site has frontage to both an arterial road and a local road access shall be to the local road.

Provision	Support / Oppose	Comments	Relief Sought
		change. AgResearch consider that in order to ensure that a new or re-positioned access meets the aims of the Plan in regards to safety and efficiency, the Plan's existing and proposed standards in relation to the location of access points (sight distances, distance to intersections etc) are sufficient to meet the intentions of the Plan in the Business 3 zone without being unnecessarily restrictive. AgResearch therefore oppose the application of this rule to the Business 3 zone.	
Rule 17.3.6 <u>17.3.6 Any vehicle crossing to a site which generates more than 250 vehicle trips per day, or any vehicle crossing providing shared access to sites which cumulatively generate more than 250 vehicle trips per day, shall be a restricted discretionary activity, except that this rule shall not apply to any site located within the Business 2A zone (Izone).</u>	Oppose	AgResearch understands that SDC is concerned about business activities being established in the Business Zone as permitted activities, with the Council having little or no control over vehicle access points, which, due to the large number of vehicle movements associated with such activities, may result in adverse safety effects, impacting upon the efficiency of the road network. However, where there are established activities, such as AgResearch's research facilities, such a rule could be triggered by any redevelopment of the site, even though the character of the activity on the site would not change from what is anticipated by the zone. AgResearch consider that the proposed rule is unnecessarily restrictive in the Business 3 Zone, where the zone is specific to the identified functions, and the character and amenity of the zone is already well-established. As such, AgResearch consider that the rule is unnecessary in the Business 3 Zone and should be exempted .	Amend proposed Rule 17.3.6 as follows <u>17.3.6 Any vehicle crossing to a site which generates more than 250 vehicle trips per day, or any vehicle crossing providing shared access to sites which cumulatively generate more than 250 vehicle trips per day, shall be a restricted discretionary activity, except that this rule shall not apply to any site located within the Business 2A zone (Izone) or the Business 3 Zone.</u>
Rule 17.5.1 And Parking Standards in Appendix 13 <u>17.45.1 Any activity which provides for car parking, cycle parking, vehicle loading and parking access in accordance with the following conditions shall be a permitted activity:</u> <u>17.45.1.1 The number of car parks provided complies with the relevant requirements for the activity as listed in Appendix E/3.1.1, E/3.1.2, E/3.1.3, E/3.1.12; and [...]</u>	Oppose	This rule requires an activity to provide car parking in accordance with the minimum parking spaces detailed in Table E/3.1(a) in Appendix 13. AgResearch operations fall within the definition (for the purposes of parking calculations) of a 'research facility'. It is proposed that the current standard of 1 space per 2 full time equivalent staff, be increased to provide for 1 space per 1.5 full time equivalent staff. AgResearch oppose this increase because no basis has been given for the increase in the accompanying section 32 report to the Plan Change. AgResearch are not aware of any concerns having been raised that the existing car parking is insufficient and has resulted in on-road parking, and as such considers that it has not been sufficiently demonstrated that the existing standard is not appropriate. In addition, an increase in car parking requirements is inconsistent with the thrust of PC12 to promote more sustainable methods of transport, encourage use of public transport etc. The explanation under proposed Issue 6 further notes that "The Regional Policy Statement directs councils to promote land use... which reduce the demand for transport, especially by private motor vehicles". The rule amendment is therefore inconsistent with proposed policies and will not achieve the amended objectives of the Plan, nor give effect to the Regional Policy Statement.	Delete the proposed change to the minimum parking spaces to be provided for 'Research facilities' in 'Table E/3.1(a) – Minimum Parking Spaces to be Provided', i.e. Retain operative Plan standards in regards to research facilities.
Rule 17.7.2 <u>17.7.2 In the Business 3 zone, any development or redevelopment of a parking area with more than 40 parking spaces shall be a controlled activity.</u> <u>17.7.2.1 The exercise of Councils discretion shall be limited to the following:</u> <u>(a) The location, layout and orientation of parking areas relative to:</u> <u>iv. Buildings, the road frontage, and any physical constraints for the site, and</u> <u>v. Vehicle manoeuvring, access and circulation, and</u> <u>vi. Pedestrian and cyclist access and circulation within the site particularly safety</u>	Oppose	AgResearch note that as this rule is specific to the Business 3 zone, its application is only relevant to discrete sites within the Lincoln Township, and to what are largely sites with long-established car parking areas, with no known history of concerns about the functionality of such parking areas. Despite no history of car parking within this zone creating problems, the definition of 'redevelopment' means that this rule would also apply to: "Any alterations to the parking area which change the pedestrian or vehicle circulation within or around the parking area", or changes to "The reconstruction, repositioning, relocation or addition, of more than five parking spaces within any one year period. While AgResearch appreciate that the activity status proposed is controlled, whereby the Council could not decline the grant of the consent, it would still	Delete Rule 17.7.2 Amend 'Reasons for Rules' as follows: <u>A higher threshold has been set in the Business 3 zone reflecting the particular nature and characteristics of the activities occurring in this zone and the reasonably high proportion of frequent users (low proportion of visitors) associated with these activities.</u> <u>The rule also does not apply to the Business 3 zone due to the specialized nature of the zone, and the existence of large car parking areas already associated with those established activities.</u>

Provision	Support / Oppose	Comments	Relief Sought
at vehicle crossings, and (b) <u>The provision of lighting for the safety and security of the parking area users, and</u> (c) <u>The amount, location, height, variation and depth of landscaping within and adjacent to the parking areas and the road frontage.</u>		require a consent process to be undertaken for what is essentially minor changes to a car parking area (changes to circulation or alteration of 5 or more spaces). On a site as large as AgResearch's, it would not be unreasonable for minor changes to be made to five parking spaces that would have no bearing on the function and safety of the overall car parking area, and to require consent for such a minor change is not considered to be an efficient or effective way to implement the related objectives. AgResearch note that any changes to car parking areas would need to meet the existing and proposed standards in the plan in relation to dimensions, manoeuvrability, location, availability and so on, and consider that these standards are sufficient to achieve the outcomes sought by the Plan without being unnecessarily restrictive. For these reasons, the rule is opposed.	

ATTACHMENT 2

Example of potential impact of proposed rules on AgResearch's land holding



LEGEND

-  Arterial Road
-  Collector Road
-  Former Strategic
-  AgResearch land
-  Town Centre
-  Example location where access from arterial road optimal for research activities
-  Local Road where access would be required under new provisions

PROPOSED ROADING HIERARCHY SDC – Proposed Plan Change 12

Source Imagery for Map Base: Google Maps, January 2011



Resource Management Group Ltd