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Resource and Environmental Management Consultants

Planning Department
Selwyn District Council
PO Box 90
Rolleston 7643

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Dear Sir/Madam

PROPOSED PLAN CHANGE 12 – SUBMISSION BY LINCOLN UNIVERSITY

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

Yours sincerely,
Resource Management Group Limited

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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: Lincoln University (**the University**)
(Note address for service below)

SUBMISSION BY LINCOLN UNIVERSITY

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

Lincoln University was established as a School of Agriculture in 1878 and in 1896 offered its first degree. That year it also became the Canterbury Agricultural College, later becoming a college of the University of New Zealand. When the University of New Zealand was dissolved in 1961 the college became Lincoln College, a constituent College of the University of Canterbury. The college was granted autonomous university status in 1990 as part of the major reforms of tertiary education in New Zealand.

Over the past twenty years, the University has continued to develop as a nationally and internationally renowned university specialising in commerce and management, primary production, natural resources, science, engineering and social science.

The University's main facilities are located on its 58 hectare campus in Lincoln and this houses modern teaching spaces, student services, accommodation, recreation, conferencing, consulting and research facilities/activities. The main Campus is zoned Business 3 in the Plan. In addition to this, the University conducts trials, research and tuition on farms and other sites in the District alongside and away from the main Campus.

In summary, there is a significant focus on research activities both within the main University Campus and on adjoining and nearby University controlled land.

This submission focuses upon the impact of PC12 on the University's main campus and on the other sites owned by the University.

In terms of its functions and responsibilities, and the importance of these as a matter of national and regional significance, the University 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, the University, while generally supportive of the intention behind PC12, opposes the change in part in relation to the matters outlined below.

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- 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:

The University **opposes PC12 in part**. In more specific terms, while the general intention behind PC12 is supported, the University opposes provisions which do not take into account the potential impact of the changes on the regionally and nationally significant facility, particularly those which could unfairly impact on any future development of the University's facilities. The University is also opposed to the specific provisions which relate to or allude to a future bypass road which would impact on University land and activities.

DETAILS OF SUBMISSIONS:

Introduction

The specific provisions which the University 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

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

The University notes that a number of recent Regional and District planning documents have signalled the importance of the research centres and farms at Lincoln, and have stated that specific consideration needs to be given to the future use of land in proximity to these 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 infrastructure*[2].

- *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 economy*[3].

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

[2] SAP, p.25

[3] SAP, p.93

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 The University 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.

LINCOLN UNIVERSITY SEEKS THE FOLLOWING DECISION FROM SELWYN DISTRICT COUNCIL:

RURAL VOLUME:

1) **Amend**:

   a. Issues 1, 2 & 3;

   b. Transport Network – Strategy;

   c. Proposed Objectives B2.1.3 & B2.1.4;

   d. Proposed Policies B2.1.2, B2.1.3, B2.1.4(a), B2.1.4(b), and B2.1.12;

   e. Proposed Rules 4.5.1.6 and 4.6.6;

As set out in Attachment 1

2) **Delete:**

   a. Proposed Policy B2.1.26

   b. Proposed Rule 4.5.1.8.

TOWNSHIP VOLUME:

3) **Amend:**

   a. Issues 1 & 3;

   b. Transport Network – Strategy;

   c. Proposed Objectives B2.1.3 & B2.1.4;

   d. Proposed Policies B2.1.2, B2.1.3, B2.1.4(a) and B2.1.25;

   e. Proposed Rules 17.2.1.7, and 17.3.6;

As set out in Attachment 1

4) **Delete:**

   a. Proposed Policy B2.1.12;

   b. Proposed change to the minimum parking spaces to be provided for 'Research facilities' and those for 'Educational' activities, as they apply to the University, in 'Table E13.1(a) – Minimum Parking Spaces to be Provided'.

   c. Proposed Rule 17.7.2 and amend the corresponding 'Reasons for Rules' as set out in Attachment 1.

5) Any other changes required to give effect to the relief sought.

ATTACHMENT 1
Submission on Specific Provisions including explanation and relief sought

Provision	Support / Oppose	Comments	Relief Sought
RURAL VOLUME			
Issue 1 – 'Integrating Land Use and Transport', Paragraph 2 *To reduce demand for transport and hence dependency on private motor vehicles, a network that facilitates more sustainable transport is required. This necessitates good connectivity (the linking of local facilities, adjoining land and surrounding neighbourhoods through interconnectivity of transport networks) and permeability (choice and ease of movement through the network) within and between urban areas in the district as well as to destinations in surrounding districts.*	Oppose in part	On balance, the University supports the identification of this issue within the District Plan. However, the University is concerned that this, and a number of other provisions, lend credence to a single site-specific issue of which the University has never supported – being the southern bypass road identified in the Christchurch Rolleston and Environs Transportation Study ("CRETS"). CRETS suggests that the bypass road should be located within the University landholdings, which is not accepted by the University, due to the significant adverse impact this would have on the University's operations. The CRETS road is an untested project within the RMA framework and consequently should not be linked to the operative policy framework at this stage. To this end, any new provision included in PC12 which supports the idea of, or enhances policy-based justification for, the concept of a southern bypass road intercepting or utilising the University's landholdings is **opposed**.	Amend proposed Issue 1 as follows: *To reduce demand for transport and hence dependency on private motor vehicles, a network that facilitates more sustainable transport is required. This necessitates good connectivity (the linking of local facilities, adjoining land and surrounding neighbourhoods through interconnectivity of transport networks) and permeability (choice and ease of movement through the network) within and between urban areas in the district as well as to destinations in surrounding districts, while balancing this against the requirements of the RMA to avoid, remedy or mitigate the adverse effects of the transport network.*
Issue 2 – 'Resident Growth', Paragraph 2 *... Selwyn District Council is concerned about effects ~~on Prebbleton Township~~ of additional traffic along Springs Road, and on Lincoln Township along ~~Ellesmere Road and James Street~~Gerald Street and access to State Highway 1 at Rolleston township and the Izone industrial area.*	Oppose in part	As with the point above, the University is concerned with the inclusion of this amendment. In the University's view, the amendment signals that the state of traffic effects at Lincoln (particularly at Gerald Street) are of concern – and therefore action maybe be required to mitigate this concern. The University considers that this could contribute to future justification for a bypass road through its landholdings as identified in the CRETS study when alternative and more efficient options are available – accordingly, the amendment is **opposed.** In addition, the University notes that the section 32 report does not appear to discuss the basis for the 'concern' outlined, and as such, questions the justification for the inclusion of the change in the Plan change, if there is no evidence to substantiate the concern.	Amend proposed Issue 2 – 'Resident Growth', paragraph 2, as follows: *... Selwyn District Council is concerned about effects of additional traffic along Springs Road, ~~and on Lincoln Township along Gerald Street~~ and access to State Highway 1 at Rolleston township and the Izone industrial area.*
Issue 3 – 'Future Transport Network' Paragraphs 1& 2 *The Christchurch Rolleston Environs Transportation Study (CRETS) identified the issue of efficient travel within and beyond the district to meet the future needs of the growing population in both Selwyn District and Christchurch City and the increasing demand for travel between these districts.* *There is an identified need to provide adequate capacity and ensure a good level of service on State Highways, arterial and collector roads between townships, to Christchurch City and other major destinations around Selwyn District. This requires upgrading existing links and providing new roads to encourage the use of main roads and avoid adverse effects of through traffic particularly on the townships of Rolleston, Lincoln, Prebbleton and Templeton.*	Oppose	This provision is **opposed** insofar as it makes direct reference to the CRETS study as a strategic basis to manage traffic demand and efficiency – and particularly as it is tied to the second paragraph where the goal is to avoid adverse effects of through traffic on the Lincoln Township. The CRETS road is an untested project within the RMA framework and consequently should not be linked to the operative policy framework at this stage. To this end, any new provision included in PC12 which supports the idea of, or enhances policy-based justification for, the concept of a southern bypass road intercepting or utilising LLD's landholdings is **opposed**.	Amend Issue 3 – 'Future Transport Network', paragraphs 1 & 2, as follows: *Selwyn District Council has commissioned transportation studies in order to consider ~~The Christchurch Rolleston Environs Transportation Study (CRETS) identified~~ the issue of efficient travel within and beyond the district to meet the future needs of the growing population in both Selwyn District and Christchurch City and the increasing demand for travel between these districts. The Council acknowledges that these studies have not been tested under the RMA framework, and as such some of the specific recommendations within them would need to first go through a separate RMA process before being implemented. To this end, there may be alternate options which are more appropriate to achieve the purposes of the RMA, than those identified within the studies.* *The studies have ~~There is an~~ identified a need to provide adequate capacity and ensure a good level of service on State Highways, arterial and collector roads between townships, to Christchurch City and other major destinations around Selwyn District. This requires upgrading existing links and providing new roads to encourage the use of main roads and avoid adverse effects of through traffic ~~particularly~~ on ~~the~~ townships ~~of Rolleston, Lincoln, Prebbleton and Templeton~~. As noted above, the Council accepts that the links and new roads have been identified from a transport engineering perspective only and that the wider consideration of the appropriateness of some of the specific projects identified is required under the RMA.*
Transport Network – Strategy, 'Future Transport Network', 4th bullet	Oppose in part	This amendment is **opposed** insofar as the "long term protection" of future	Amend proposed Transport Network – Strategy, 'Future

Provision	Support / Oppose	Comments	Relief Sought
point - *Policies and rules that ensure the long term protection of transport systems including transport corridors*		"transport corridors" pertains to the potential bypass road through the University's landholdings as identified in the CRETS study. As already noted, the CRETS road is an untested project within the RMA framework and consequently should not be linked to the operative policy framework at this stage.	Transport Network', as follows: - *Policies and rules that ensure the long term protection of transport systems ~~including transport corridors~~*
Objective B2.1.3 *Future road networks and transport corridors are designed, located and protected, to promote and provide for: sustainable transport modes; and alternatives to road movement of freight such as rail.*	Oppose in part	This objective is **opposed** on the basis that it places too much emphasis on the protection of future road networks and transport corridors, without balancing this against the purpose of the RMA to enable people and communities to provide for their social, economic, and cultural well-being while avoiding, remedying or mitigating the potential adverse effects of such networks and corridors. The University has concerns that the objective, as currently worded, is therefore not the most appropriate way to achieve the purposes of the RMA. In particular, the University considers that the proposed objective does not give effect to the operative provisions of the Regional Policy Statement (RPS). Objective 2, Chapter 15, of the RPS seeks to *"Avoid, remedy or mitigate the adverse effects on the environment of transport use and provision"*. This is supported by Policy 4 which aims to *"Ensure that in the provision, realignment or maintenance of transport infrastructure, adverse effects on natural resources that meet the criteria of sub-chapter 20.4 are avoided, remedied, or mitigated"*. In sub-chapter 20.4, regionally significant matters include *"values and natural and physical resources of recognised national or international significance"* and *"structures and infrastructures that are necessary to the social, economic or cultural functioning of the Canterbury community, for example, the port of Lyttelton"* As outlined in the main body of this submission, it has been well established that the university is a regionally and nationally significant facility, and therefore meets the criteria in sub-chapter 20.4 as outlined above. The University considers that the amendments sought in this submission are the most appropriate way to meet the purposes of the RMA and give effect to the operative Regional Policy Statement.	Amend proposed Objective B2.1.3 as follows: *Future road networks and transport corridors are designed, located and protected, to promote and provide for: sustainable transport modes; and alternatives to road movement of freight such as rail, while ensuring that such networks avoid, remedy or mitigate adverse effects on people, communities and nationally and regionally significant tertiary education and research facilities.* Amend corresponding explanation as follows: *Objective B2.1.3 relates to improving the permeability (providing choice and ease of movement through the network) and accessibility of the transport network in terms of the design, form, function and location of roads for example to achieve greater connectivity, as well as the provision for sustainable modes of travel. Providing a high level of connectivity can reduce travel distances and make active modes more attractive and efficient for users where such provision can have environmental and social benefits. However, the permeability and accessibility of the network needs to be balanced against consideration of the adverse effects that the transport network can have on people and communities, for example, the location of new roads.*
Objective B2.1.4 *Adverse effects of land transport networks on natural or physical resources or amenity values, are remedied or mitigated, including adverse effects on the environment from construction, operation and maintenance.*	Oppose in part	The University has concerns that the proposed Objective ignores the requirements of the RMA, as noted above, to "avoid, remedy or mitigate". The University considers that the current wording is too strongly weighted towards provisions of transport networks, without the required balance pertaining to amenity values. Accordingly, the University seeks to **amend** the Objective to address these matters.	Amend proposed Objective B2.1.4 as follows: *Adverse effects of land transport networks on natural or physical resources or amenity values, are avoided, remedied or mitigated, including adverse effects on the environment from construction, operation and maintenance.* Amend corresponding explanation as follows: *Roads, pathways and rail links may pass through or alongside bush areas, waterbodies and wetlands, over slopes, and over or near sites of special cultural, ~~or~~ heritage, or other important values. Objective B2.1.4 addresses the effects which the location, construction and maintenance of roads, pathway and rail links may have on the surrounding area and land uses. Objective B2.1.4 is implemented using a combination of: advocacy; encouraging good practice among requiring authorities; and the Council's power under section 176(A) of the Act to approve outline plans for designations ...*
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*	Oppose in part	In general terms, the University 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.	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 any established land uses of regional or national significance.* *Policy B2.1.3*

Provision	Support / Oppose	Comments	Relief Sought
hierarchy. *Policy B2.1.3* *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.* *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.* *Policy B2.1.4(b)* *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.*		While the University understand the general rationale behind such provisions, they are **opposed** in relation to the impact that they will have on existing the University 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. The University are concerned about the application of this policy (and associated rules) to established activities such as the large rural landholdings associated with the University's agricultural and research activities, More specifically, Proposed Objective B2.1.1 & B2.1.2 both refer to '*an integrated approach to land use and transport planning*'. The University has 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.*" The University 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 the University 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'.	*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, 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 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 B2.1.4(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 *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.*	Oppose in part	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 University's facilities, nor recognise the identified regional and national importance of these facilities.	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, 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.* 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* *– New vehicle crossings created when allotments are subdivided and sold.* *State Highway and Arterial roads are managed ….*
Policy B2.1.26 *Encourage heavy vehicles to use routes which bypass townships, where practical, and avoid new residential development along heavy vehicle bypasses.*	Oppose	The University understands the general thrust intended by the policy. However, the policy as drafted lends credence to the potential bypass road through the University's landholdings, and as such the Policy is **opposed**. The policy (and corresponding explanation) places too strong an emphasis on the provision of heavy vehicle bypasses, emphasising the adverse effects of heavy vehicles travelling through townships. However, conversely, the Policy does not address in any way,	Delete Policy B2.1.26.

Provision	Support / Oppose	Comments	Relief Sought
		the potential adverse effects of establishing alternative routes for heavy vehicles, and as such, the University does not consider that the policy is the most appropriate way to give effect to proposed Objectives, nor the purposes of the RMA.	
Rule 4.5.1.6 *4.5.1.6 Any access to a State Highway or Arterial Road complies with the following:* *(a) No legal access is available from another road;* *(b) The traffic generated through the access to the State Highway or Arterial Road is less than 100 ecm/d* *[...]*	Oppose	This rule is **opposed** as it does not recognise the existing and unique nature of the University's facilities, nor the regional and national importance of such facilities. While the University 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 a number of arterial roads the University's landholdings have frontage to, 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 the University to go through a time-consuming and costly resource consent process, which the University does not consider recognises the importance of their activities. In particular, due to the large size of some of the University'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. The University 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. The University 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 the University 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.	Amend Rule 4.5.1.6 so that (a) and (b) do not apply to **arterial** roads.
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 the University directly front onto Arterial Roads. The University 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 the University 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 University-owned site, where the rule would technically require an access to be provided off Springs Road (which is a Collector Road where it is adjacent to the University's campus), because the 'site' as a whole has frontage to this road as well as Ellesmere Junction Road. This scenario is demonstrated in Attachment 2. Further, the rule, as it is currently drafted, does not provide any exemption to	Delete proposed Rule 4.5.1.8

Provision	Support / Oppose	Comments	Relief Sought
		where an existing activity may be established, but an access point may be changed. In this regard, the activity and its associated effects are already established, and the re-positioning or addition of an access will not alter these effects generally. The University 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. The University consider that it is more appropriate that when a new activity is established the approach (favouring lower hierarchy roads) is applied. As such, the University 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	The University **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 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 the University 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 are essentially minor changes to a car parking area (changes to circulation or alteration of 5 or more spaces). On a site as large as the University'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. In addition, the proposed rule (as it would apply to a minor redevelopment,) is inconsistent with section 10 of the RMA in that where car parking changes are "the same or similar in character, intensity, and scale" they are protected by 'existing use rights', for which consent is not required. This makes the proposed rule highly inefficient and questionable in terms of its legality. The University 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			
Issue 1 – 'Integrating Land Use and Transport', Paragraph 2 *To reduce demand for transport and hence dependency on private motor vehicles, a network that facilitates more sustainable transport is required. This necessitates good connectivity (the linking of local facilities, adjoining land and surrounding neighbourhoods through interconnectivity of transport networks) and permeability (choice and ease of movement through the network) within and between urban areas in the district as well as to destinations in surrounding districts.*		On balance, the University supports the identification of this issue within the District Plan. However, the University is concerned that this, and a number of other provisions, lend credence to a single site-specific issue of which the University has never supported – being the southern bypass road identified in the Christchurch Rolleston and Environs Transportation Study ("CRETS"). CRETS suggests that the bypass road should be located within the University landholdings, which is not accepted by the University, due to the significant adverse impact this would have on the University's operations. The CRETS road is as yet an untested project within the RMA framework and consequently should be given limited consideration. To this end, any new provision included in PC12 which supports the idea of, or enhances policy-based	Amend proposed Issue 1 as follows: *To reduce demand for transport and hence dependency on private motor vehicles, a network that facilitates more sustainable transport is required. This necessitates good connectivity (the linking of local facilities, adjoining land and surrounding neighbourhoods through interconnectivity of transport networks) and permeability (choice and ease of movement through the network) within and between urban areas in the district as well as to destinations in surrounding districts, while balancing this against the requirements of the RMA to avoid, remedy or mitigate the adverse effects of the transport network.*

Provision	Support / Oppose	Comments	Relief Sought
		justification for, the concept of a southern bypass road intercepting or utilising the University's landholdings is **opposed**.	
Issue 3 – 'Future Transport Network' Paragraphs 1& 2 *The Christchurch Rolleston Environs Transportation Study (CRETS) identified the issue of efficient travel within and beyond the district to meet the future needs of the growing population in both Selwyn District and Christchurch City and the increasing demand for travel between these districts.* *There is an identified need to provide adequate capacity and ensure a good level of service on State Highways, arterial and collector roads between townships, to Christchurch City and other major destinations around Selwyn District. This requires upgrading existing links and providing new roads to encourage the use of main roads and avoid adverse effects of through traffic particularly on the townships of Rolleston, Lincoln, Prebbleton and Templeton.*	Oppose	This provision is **opposed** insofar as it makes direct reference to the CRETS study as a strategic basis to manage traffic demand and efficiency – and particularly as it is tied to the second paragraph where the goal is to avoid adverse effects of through traffic on the Lincoln Township. The CRETS road is an untested project within the RMA framework and consequently should not be linked to the operative policy framework at this stage. To this end, any new provision included in PC12 which supports the idea of, or enhances policy-based justification for, the concept of a southern bypass road intercepting or utilising the University's landholdings is **opposed**.	Amend Issue 3 – 'Future Transport Network', paragraphs 1 & 2, as follows: *Selwyn District Council has commissioned transportation studies in order to consider ~~The Christchurch Rolleston Environs Transportation Study (CRETS) identified~~ the issue of efficient travel within and beyond the district to meet the future needs of the growing population in both Selwyn District and Christchurch City and the increasing demand for travel between these districts. The Council acknowledges that these studies have not been tested under the RMA framework, and as such some of the specific recommendations within them would need to first go through a separate RMA process before being implemented. To this end, there may be alternate options which are more appropriate to achieve the purposes of the RMA, than those identified within the studies.* *The studies have ~~There is an~~ identified a need to provide adequate capacity and ensure a good level of service on State Highways, arterial and collector roads between townships, to Christchurch City and other major destinations around Selwyn District. This requires upgrading existing links and providing new roads to encourage the use of main roads and avoid adverse effects of through traffic ~~particularly~~ on ~~the~~ townships ~~of Rolleston, Lincoln, Prebbleton and Templeton~~. As noted above, the Council accepts that the links and new roads have been identified from a transport engineering perspective only and that the wider consideration of the appropriateness of some of the specific projects identified is required under the RMA.*
Transport Network – Strategy, 'Future Transport Network', 4th bullet point - *Policies and rules that ensure the long term protection of transport systems including transport corridors*	Oppose in part	This amendment is **opposed** insofar as the "long term protection" of future "transport corridors" pertains to the potential bypass road through the University's landholdings as identified in the CRETS study. The CRETS road is an untested project within the RMA framework and consequently should not be linked to the operative policy framework at this stage.	Amend proposed Transport Network – Strategy, 'Future Transport Network', as follows: - *Policies and rules that ensure the long term protection of transport systems ~~including transport corridors~~*
Objective B2.1.3 *Future road networks and transport corridors are designed, located and protected, to promote and provide for: sustainable transport modes; and alternatives to road movement of freight such as rail.*	Oppose in part	This objective is **opposed** on the basis that it places too much emphasis on the protection of future road networks and transport corridors, without balancing this against the purpose of the RMA to enable people and communities to provide for their social, economic, and cultural well-being while avoiding, remedying or mitigating the potential adverse effects of such networks and corridors. The University has concerns that the objective, as currently worded, is therefore not the most appropriate way to achieve the purposes of the RMA. In particular, the University considers that the proposed objective does not give effect to the operative provisions of the Regional Policy Statement (RPS). Objective 2, Chapter 15, of the RPS seeks to *"Avoid, remedy or mitigate the adverse effects on the environment of transport use and provision"*. This is supported by Policy 4 which aims to *"Ensure that in the provision, realignment or maintenance of transport infrastructure, adverse effects on natural resources that meet the criteria of sub-chapter 20.4 are avoided, remedied, or mitigated"*. In sub-chapter 20.4, regionally significant matters include *"values and natural and physical resources of recognised national or international significance"* and *"structures and infrastructures that are necessary to the social, economic or cultural functioning of the Canterbury community, for example, the port of Lyttelton"* As outlined in the main body of this submission, it has been well established that the university is a regionally and nationally significant facility, and therefore meets the criteria in sub-chapter 20.4 as outlined above.	Amend proposed Objective B2.1.3 as follows: *Future road networks and transport corridors are designed, located and protected, to promote and provide for: sustainable transport modes; and alternatives to road movement of freight such as rail, while ensuring that such networks avoid, remedy or mitigate adverse effects on people, communities and nationally and regionally significant tertiary education and research facilities* *Objective B2.1.3 relates to improving the permeability (providing choice and ease of movement through the network) and accessibility of the transport network in terms of the design, form, function and location of roads for example to achieve greater connectivity, as well as the provision for sustainable modes of travel. Providing a high level of connectivity can reduce travel distances and make active modes more attractive and efficient for users where such provision can have environmental and social benefits. However, the permeability and accessibility of the network needs to be balanced against consideration of the adverse effects that the transport network can have on people and communities, for example, the location of new roads.*

Provision	Support / Oppose	Comments	Relief Sought
		The University considers that the amendments sought in this submission are the most appropriate way to meet the purposes of the RMA and give effect to the operative Regional Policy Statement.	
Objective B2.1.4 *Adverse effects of land transport networks on natural or physical resources or amenity values, are remedied or ~~minimised~~, mitigated, including adverse effects on the environment from construction, operation and maintenance.*	Oppose in part	The University has concerns that the proposed Objective ignores the requirements of the RMA, as noted above to "avoid, remedy or mitigate". The University considers that the current wording is too strongly weighted towards provisions of transport networks, without the required balance pertaining to amenity values. Accordingly, the University seeks to **amend** the Objective to address these matters.	Amend proposed Objective B2.1.4 as follows: *Adverse effects of land transport networks on natural or physical resources or amenity values, are avoided, remedied or mitigated, including adverse effects on the environment from construction, operation and maintenance.* Amend corresponding explanation as follows: *Roads, pathways and rail links may pass through or alongside bush areas, waterbodies and wetlands, over slopes, and over or near sites of special cultural, ~~or~~ heritage, or other important values. Objective B2.1.4 addresses the effects which the location, construction and maintenance of roads, pathway and rail links may have on the surrounding area and land uses. Objective B2.1.4 is implemented using a combination of: advocacy; encouraging good practice among requiring authorities; and the Council's power under section 176(A) of the Act to approve outline plans for designations ...*
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)* *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 ~~stock~~ access required by the activity.* *Policy B2.1.4(b)* *Avoid adverse effects on the safe flow of traffic along ~~Strategic Road~~ State Highways and Arterial Roads from new property access, where the speed limit is more than 70 km/hr.*	Oppose in Part	In general terms, the University 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 the University understand the general rationale behind such provisions, they are **opposed** in relation to the impact that they will have on existing University facilities, as set out below in relation to the specific provisions to which the policies relate. In particular, the University note that Proposed Objective B2.1.1 & B2.1.2 both refer to '*an integrated approach to land use and transport planning*'. The University 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.*" The University 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 the University 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.	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 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 B2.1.12	Oppose	As noted throughout this submission, the CRETS study is untested within a RMA framework and consequently should not be aligned to the operative policy	Delete the proposed final paragraph to the 'Explanations and Reasons' for Policy B2.1.12.

Provision	Support / Oppose	Comments	Relief Sought
Address the impact of new residential or business activities on both the local roads around the site and the District's road network, particularly Arterial Road links with Christchurch City. *Explanation and Reasons* *... A Transport study (CRETS) was undertaken between 2002-2007 to identify the transport needs for the wider South West Christchurch area (including Selwyn District) where high population growth is anticipated. This study identified the transport needs to 2021 and beyond as agreed by the study partners (Selwyn District Council, Christchurch City Council, New Zealand Transport Agency, Environment Canterbury and Christchurch International Airport). The study identified a number of road improvements, public transport, walking and cycling works to manage the transport demands to assist in reducing the impacts of transport demand associated with the anticipated population growth in the study areas and the impacts this has on travel between Selwyn District and Christchurch City.*		framework at this stage. The CRETS study identifies a number of issues and potential mitigation which may not be appropriate within a RMA context. On the above basis, the University opposes all reference to the CRETS study, specifically insofar as it encourages the location of a bypass road through the University's landholdings.	If the primary relief is not granted, then as a secondary relief, amend the explanation as follows: *... ~~A Transport study (CRETS) was~~ Transportation studies have been undertaken ~~between 2002-2007~~ to identify the transport needs for the wider South West Christchurch area (including Selwyn District) where high population growth is anticipated. ~~This study identified the transport needs to 2021 and beyond as agreed by the study partners (Selwyn District Council, Christchurch City Council, New Zealand Transport Agency, Environment Canterbury and Christchurch International Airport). The study~~ While such studies identify ~~identified~~ a number of road improvements, public transport, walking and cycling works to manage the transport demands to assist in reducing the impacts of transport demand associated with the anticipated population, ~~growth in the study areas and the impacts this has on travel between Selwyn District and Christchurch City~~. the Council accepts that these work have been identified from a transport engineering perspective only and that the wider consideration of the appropriateness of some of the specific projects identified which is required under the RMA have yet to be tested.*
Policy B2.1.25 *Policy B2.1.~~2~~125* *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 construction and maintenance of roads, but makes no mention of the impact on regionally/nationally significant facilities such as those owned/operated by the University. The University suggest that while an extensive overhaul of the transport provisions in the Plan are being updated, partly in order to give effect to higher level planning documents, it is similarly appropriate to **amend** this Policy to include such facilities as a matter worthy of protection from the potential adverse effects of construction and maintenance of roads, as 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** *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:* *- nationally and regionally important tertiary education and research facilities.* 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 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	The University's main campus is located on the corner of Ellesmere Junction Road, which is an Arterial Road, and Springs Road, which is a collector road in this location. The University's 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 access could not be established off Ellesmere Junction Road without consent, even if it is impractical to have an access off Springs Road, due to the sheer size of the campus. Additionally, the University 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. The University 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 the University to go through a time-consuming and costly consent process should any new or relocated access be proposed off Ellesmere Junction Road. 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	Amend proposed Rule 17.2.1.7 as follows: *17.2.1.7 Any site (except within the Business 3 Zone) 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.*

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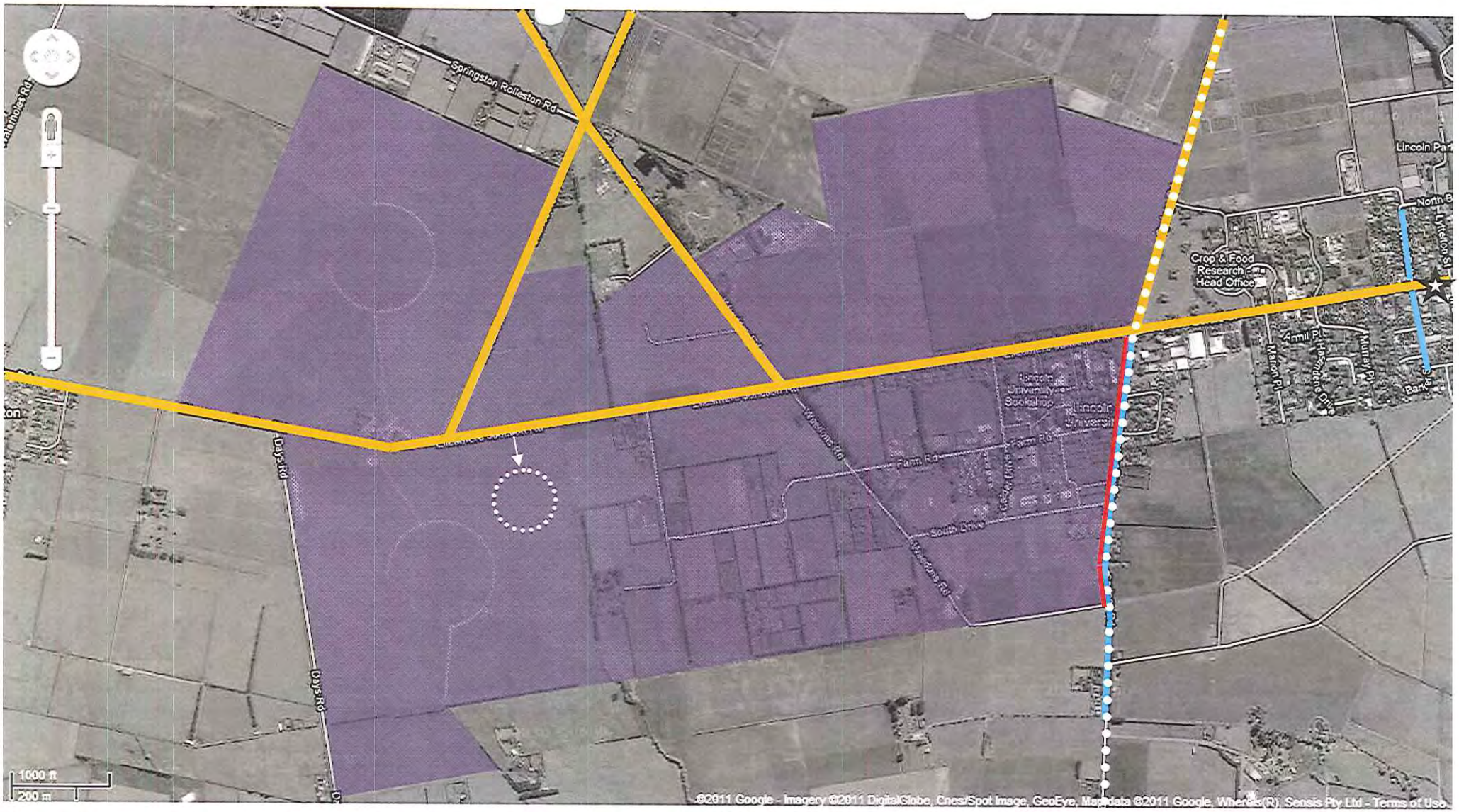
Provision	Support / Oppose	Comments	Relief Sought
		movements associated with such activities, are part of the character and amenity values associated with the current operations, albeit that the location of an access may change. The University consider that in order to ensure that a new or re-positioned 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. The University therefore **oppose** the application of this rule to the Business 3 zone.	
Rule 17.3.6 *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).*	Oppose	The University 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 roading network. However, where there are established activities, such as the University's main campus, 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. The University 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, the University consider that the rule is unnecessary in the Business 3 Zone and should be **exempted**.	Amend proposed Rule 17.3.6 as follows *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..*
Rule 17.5.1 **And Parking Standards in Appendix 13** *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:* *17.45.1.1 The number of car parks provided complies with the relevant requirements for the activity as listed in Appendix E13.1.1, E13.1.2, E13.1.3, E13.1.12; and […]*	Oppose	This rule requires an activity to provide car parking in accordance with the minimum parking spaces detailed in Table E13.1(a) in Appendix 13, The University operations largely fall within the definition (for the purposes of parking calculations) of those for 'educational' activities and 'research facilities'. With regard to 'educational' activities, PC12 proposes that the current standards of : • 1 space per 2 staff; and • 1 space per 10 students over 15 years of age Be increased to: • 1 space per full-time equivalent staff member; and • 1 space per 8 students over 15 years of age. The University has concerns that the section 32 report focuses on these changes being required largely to do with addressing known parking problems relating to high schools. The University **opposes** such a blanket change to 'educational' activity standards because it unfairly affects the University, when its current parking supply has not created any known parking issues, and is therefore not the most appropriate way to achieve the objectives of the Plan. With regard to 'research facilities' PC12 proposes 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. The University **oppose** this increase because no basis has been given for the increase in the accompanying section 32 report to the Plan Change. The University 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, the University considers that an increase in car parking requirements is inconsistent with the thrust of PC12 to promote more sustainable methods of	Delete the proposed change to the minimum parking spaces to be provided for 'Research facilities' in 'Table E13.1(a) – Minimum Parking Spaces to be Provided', i.e. Retain operative Plan standards in regards to research facilities. Amend the minimum parking spaces to be provided for 'Educational' activities in 'Table E13.1(a) – Minimum Parking Spaces to be Provided', as follows: *Educational (excluding Preschools and universities)* Insert new provision for parking for universities as follows: *Universities* *1 space per 2 staff, plus 1 space per 10 students.*

Provision	Support / Oppose	Comments	Relief Sought
		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.	
Rule 17.7.2 *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.* *17.7.2.1 The exercise of Councils discretion shall be limited to the following:* *(a) The location, layout and orientation of parking areas relative to:* *iv. Buildings, the road frontage, and any physical constraints for the site, and* *v. Vehicle manoeuvring, access and circulation, and* *vi. Pedestrian and cyclist access and circulation within the site particularly safety at vehicle crossings, and* *(b) The provision of lighting for the safety and security of the parking area users, and* *(c) The amount, location, height, variation and depth of landscaping within and adjacent to the parking areas and the road frontage.*	Oppose	The University 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 the University 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 are essentially minor changes to a car parking area (changes to circulation or alteration of 5 or more spaces). On a site as large as the University'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. In addition, the proposed rule (as it would apply to a minor redevelopment,) is inconsistent with section 10 of the RMA in that where car parking changes are "the same or similar in character, intensity, and scale" they are protected by 'existing use rights', for which consent is not required. This makes the proposed rule highly inefficient and questionable in terms of its legality. The University 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.**	Delete Rule 17.7.2 Amend 'Reasons for Rules' as follows: ~~*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.*~~ *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.*

ATTACHMENT 2

Example of potential impact of proposed rules on Lincoln University's land holdings



LEGEND

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

PROPOSED ROADING HIERARCHY

SDC – Proposed Plan Change 12

Source imagery for Map Base: Google Maps. January 2011

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Resource Management Group Ltd