

David Hattam

From: Jason Jones <Jason@rmgroup.co.nz>
Sent: Friday, 4 March 2011 2:30 p.m.
To: Cameron Wood; David Hattam
Cc: David McMahon
Subject: LLD Submission on PC12
Attachments: LLD_Submission__PC12__FINAL.pdf

Cameron & David.

Sorry for the tardiness in getting this to you. As David McMahon has noted earlier in the week, RMG is without offices at the moment and have only just recovered access to our server late this week.

Please find attached the submission from Lincoln Land Development on Proposed Plan Change 12. As our offices are not accessible, I cannot provide you with a hard copy at this time. Accordingly, will one of you please confirm receipt of this electronic version, and that it is sufficient for your processing needs?

I have remote access to email, so you can reach me through that channel - alternatively, my mobile number is 021 079 8357. Feel free to call if you need to discuss anything.

Regards

Jason Jones
Consultant Planner
RMG

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 Land Development (**LLD**)
(Note address for service below)

SUBMISSION BY LINCOLN LAND DEVELOPMENT

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

LLD was formed in 2007 as a new joint venture between Ngai Tahu Property Limited and Lincoln University. LLD set out to develop a 117ha site on the west side of Lincoln known as the Dairy Block (see Attachment One). The aim of this joint venture is to employ best practice urban design principles to create a 'flagship' integrated neighbourhood for the Lincoln Township and the Greater Canterbury area.

The wider Dairy Block site currently has a mix of residential zoned Living 1, 1A3, 1A4 and 2 which provide for a large variety of lot sizes (ranging from 500 to 3,000m²). There is a portion of land zoned B3 at the west of the site which is currently used for car parking and the south-eastern extent is zoned Outer Plains.

The northern half of the Dairy Block is also subject to an Outline Development Plan (**ODP**) as set out in Appendix 18 (Operative Selwyn District Plan, Volume 1: Townships, Part E). This area has been the subject of subdivision consent applications 095070 (**Stage 1**) and 095174 (**Stage 2**) which were granted by Council-appointed Commissioners in December 2009. Construction on Stage 1 commenced in early 2010 with Stage 2 likely to begin later this year. The undeveloped southern half of the block is earmarked in the Council's proposed Plan Change 7 as a Greenfield ODP Area.

PREVIOUS INVOLVEMENT IN DRAFT CONSULTATION:

Prior to the notification of PC12, SDC identified LLD as a key stakeholder to the plan change (then in draft form). Consequently, LLD was invited to become involved (in a limited manner) in the development of the proposed plan change. This involved LLD providing comments on the draft plan change, and liaising with Council Staff informally – it did not involve any formal workshops, meetings or the like.

LLD accepted Council's invitation, identifying a number of issues it supported and issues it sought amendment to. These issues identified in the LLD comments on the draft plan change form the basis for this formal submission on notified PC12. In broad terms, LLD agrees with the intentions of PC12, but opposes the plan change in part for the reasons discussed below.

SUMMARY OF SUBMISSION POINTS:

LLD is supportive of the proposed PC12 in general and the emphasis that it places on integrated planning and transport outcomes. Notwithstanding this, LLD formally seeks that some matters proposed in PC12 be revisited, clarified and/or amended as set out below.

- a. LLD does not support the future construction of a bypass road within its landholdings (as identified in CRETS¹). This includes the insertion of any new provision in PC12 which supports the idea of, or enhances policy-based justification for, the concept of a southern bypass road intercepting, adjacent to, or utilising LLD's landholdings;
- b. LLD does not support the new Controlled Activity rules for the creation or alteration of parking areas of greater than 40 spaces in Living Zones and 20 spaces in Business Zones. If the Council is of the mind to preserve the provisions, LLD seeks that the threshold for the number of spaces which trigger the need for consent be increased;
- c. LLD is not supportive of an overall increase in the number of carparks required for business and office facilities. The s32 analysis has not adequately justified the need for these amendments;
- d. LLD questions the need for Council to be exempt from complying with road design standards (Rules 4.4.1 and 5.1.1) and seeks further explanation as to the reasoning for the exemption;
- e. LLD does not support the reduction in the number of residential units which are able to access single Right of Ways (Rule 5.2.1.7) and seeks that the proposed amendment is deleted from PC12;
- f. LLD does not support the inclusion of Notes 8 & 9 at the outset of Chapter 12. These create uncertainty in the applicability of the Restricted Discretionary & Non-notified status of subdivision applications which comply with all standards and terms under Chapter 12.1, but require land use consent for some other activity (e.g. earthworks);
- g. LLD does not support the requirement that all corner allotments in the Living zones contain a 3m splay. Non-utilisation of splays can contribute to lower speed environments in residential areas where such outcomes are desired, whilst still maintaining adequate site lines and safe overall intersection design. This should be reflected in the rule requiring splays on corner allotments (i.e. by an exemption); and
- h. LLD opposes the introduction of provisions relating to the use of point strips.

THE SPECIFIC PROVISIONS SUBMITTED ON:

The specific provisions, support/opposition, details of submission and relief sought are detailed in Attachment Two.

¹ Christchurch Rolleston and Environs Transportation Study

HEARING

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

Submission signed for and on behalf of **Lincoln Land Development:**



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John Scheele
Consultant Planner
Resource Management Group Ltd

Dated: 4 March 2011

Address for service of submitter:

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ATTACHMENTS

- (One) LLD landholdings – the Dairy Block
- (Two) Reasons for submission and relief sought

ATTACHMENT ONE

LLD landholdings – the Dairy Block



Block)

re

bypass (indicative CRETS alignment)

bypass (indicative Plan Change 7

LINCOLN LAND DEVELOPMENT SDC – Proposed Change 12

Online Version for Land Use Change 12 - January 2014

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ATTACHMENT TWO

Reason for submission and relief sought

Provision	Support / Oppose	Comments	Relief Sought
RURAL VOLUME			
Issue 1 – ‘Integrating Land Use and Transport’, Paragraph 2 <u>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.</u>	Oppose in part	On balance, the LLD supports the identification of this issue within the District Plan. However, LLD is concerned that this, and a number of other provisions, lend credence to a single site-specific issue of which LLD 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 LLD landholdings, which is not accepted by LLD, due to the significant adverse impact this would have on LLD’s land use potential. 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. As with the point above, LLD is concerned with the inclusion of this amendment. In the LLD’s view, the amendment signals that the state of traffic effects at Lincoln (particularly at Gerald Street) are of concern – and therefore action may be required to mitigate this concern. LLD 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, LLD 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 amendment to the Issue in the Plan change, if there is no evidence to substantiate the concern.	Amend proposed Issue 1 as follows (proposed new text shown as underlined): 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, <u>while balancing this against the requirements of the RMA to avoid, remedy or mitigate the adverse effects of the transport network.</u>
Issue 2 – ‘Resident Growth’, Paragraph 2 <u>... 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.</u>	Oppose in part	Amend proposed Issue 2 – ‘Resident Growth’, paragraph 2, as follows (proposed text to be deleted shown as ~~struck through~~): ... 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.~~	Amend proposed Issue 2 – ‘Resident Growth’, paragraph 2, as follows (proposed text to be deleted shown as ~~struck through~~): ... 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 <u>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.</u> <u>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.</u>	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. <u>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.</u> <u>The studies have 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.</u>
Transport Network – Strategy, ‘Future Transport Network’, 4th bullet point <u>- Policies and rules that ensure the long term protection of transport systems including transport corridors</u>	Oppose in part	This amendment is opposed insofar as the “long term protection” of future “transport corridors” pertains to the potential bypass road through LLD’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.	Amend proposed Transport Network – Strategy, ‘Future Transport Network’, as follows: - Policies and rules that ensure the long term protection of transport systems <u>including transport corridors</u>

Provision	Support / Oppose	Comments	Relief Sought
Objective B2.1.3 <u>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.</u>	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. LLD has concerns that the objective, as currently worded, is therefore not the most appropriate way to achieve the purposes of the RMA. In particular, LLD 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" LLD 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: <u>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.</u> 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 <u>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.</u>	Oppose in part	LLD has concerns that the proposed Objective ignores the requirements of the RMA, as noted above, to "avoid, remedy or mitigate". LLD considers that the current wording is too strongly weighted towards provisions of transport networks, without the required balance pertaining to amenity values. Accordingly, LLD 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 <u>avoided, remedied or mitigated</u>, 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 <u>location, construction and maintenance</u> 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 ..
Policy B2.1.26 <u>Encourage heavy vehicles to use routes which bypass townships, where practical, and avoid new residential development along heavy vehicle bypasses.</u>		LLD understands the general thrust intended by the policy. However, the policy as drafted lends credence to the potential bypass road through the LLD'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, the potential adverse effects of establishing alternative routes for heavy vehicles, and as such, LLD does not consider that the policy is the most appropriate way to give effect to proposed Objectives, nor the purposes of the RMA.	Delete Policy B2.1.26.
TOWNSHIP VOLUME			
Issues, Objectives and Policies			
Issue 1 – 'Integrating Land Use and Transport', Paragraph 2 <u>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</u>		On balance, LLD supports the identification of this issue within the District Plan. However, LLD is concerned that this, and a number of other provisions, lend credence to a single site-specific issue of which LLD 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 LLD landholdings, which is not accepted by LLD, due to the significant adverse impact this would have on LLD's operations.	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

Provision	Support / Oppose	Comments	Relief Sought
to destinations in surrounding districts.		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 justification for, the concept of a southern bypass road intercepting or utilising LLD's landholdings is opposed. 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.	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. Amend Issue 3 – 'Future Transport Network', paragraphs 1 & 2, as follows: <u>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.</u> <u>The studies have 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.</u>
Issue 3 – 'Future Transport Network' Paragraphs 1& 2 <u>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.</u> <u>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.</u>			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
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 LLD'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 Objective B2.1.3 as follows: <u>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.</u> <u>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.</u>
Objective B2.1.3 <u>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.</u>	Oppose in part	LLD 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 B2.1.4 as follows:
Objective B2.1.4	Oppose in part	LLD has concerns that the proposed Objective ignores the requirements of the	Amend proposed Objective B2.1.4 as follows:

Provision	Support / Oppose	Comments	Relief Sought
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.		RMA, as noted above to “avoid, remedy or mitigate”. LLD considers that the current wording is too strongly weighted towards provisions of transport networks, without the required balance pertaining to amenity values. Accordingly, LLD seeks to amend the Objective to address these matters.	Adverse effects of land transport networks on natural or physical resources or amenity values, are <u>avoided</u> , 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 <u>and advocacy</u> ; encouraging good practice among requiring authorities; and the Council's power under section 176(A) of the Act to approve outline plans for designations ...
Policy B2.1.12 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 demand associated with the anticipated population growth in the study areas and the impacts this has on travel between Selwyn District and Christchurch City.	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 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, LLD opposes all reference to the CRETS study, specifically insofar as it encourages the location of a bypass road through LLD's landholdings.	Delete the proposed final paragraph to the 'Explanations and Reasons' for Policy B2.1.12. 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 works 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.
Rules & Other Methods			
Rule 5.2.1.7 Shared access to more than 6 sites (or potential sites) shall be by road and not by a private access way.	Oppose	Previous provisions (Table E 13.4) allowed for up to 10 dwellings to be accessed by private ROW, and this is to now be limited to 6. LLD notes that the Council is encouraging the incorporation of higher density residential typologies within new greenfield Living Zones. This could see the inclusion of terrace housing, multi-unit and apartment typologies (to name a few). With the expected rise in retirement age individuals requiring new living environments, it is likely that retirement villages will also be an increasingly attractive living option in the near future. Requiring a legal road to provide access for some facilities which sit in this higher density realm might not be universally appropriate, and the provisions of the District Plan should recognise this. By way of example, Council approved the Stage 2 resource consent for the Dairy Block in December 2009, which included several examples of higher density lots where access to up to 9 properties is gained off of a single ROW. Further, in comparison to the relevant plan provisions in the Christchurch City Plan, up to 15 units can be accommodated by a single ROW, and legal road formation is only triggered in excess of that standard. LLD questions why the reduction is necessary, particularly in light of the Council's intensification targets for its Townships. In LLD's view the s32 report does not sufficiently justify this amendment.	Delete Proposed Rule 5.2.1.7
			Delete Proposed Rule 5.5.2.

Provision	Support / Oppose	Comments	Relief Sought
Rule 5.5.2 Any development or redevelopment of a parking area of more than 40 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	LLD supports the general thrust of this provision to encourage safe and aesthetically well-design carparking areas, but questions the appropriateness of the 40 space threshold for requiring consent. The s32 report is silent on the justification of this figure.	
Chapter 12 - New notes 8&9 8. Attention is drawn to the provisions of any other relevant zone/activity rules for land use activities that may be associated with subdivisions. Should an activity not meet any one or more of those rules, then application for consent will also need to be made in respect to those rules. 9. Any application arising from non-compliance with land use rules in the zone/activity standards caused by the proposed subdivision shall be considered jointly with the subdivision consent.	Oppose	These notes imply that any necessary land use activity, for example earthworks, or road formation, which requires resource consent under other chapters of the District Plan will be bundled together with a correlating subdivision application. This creates uncertainty when determining notification status for such an activity. Specifically, subdivisions are a Restricted Discretionary Activity and to be non-notified where an application complies with all of the relevant standards set out under rule 12.1. However, even if these standards and terms are complied with, a non-compliance with say corner play requirements (as defined under PC12) or earthworks volumes would lead to a higher activity status, and presumably trump the Restricted & non-notified status anticipated under Operative Chapter 12. While it may be appropriate for subdivision and land use activities to be applied for concurrently (under s88, RMA) and decided upon jointly (under s104), LLD does not consider it appropriate that they necessarily be considered jointly in terms of making a decision under s95 – particularly given the express clause for non-notification of 'complying' subdivision activities.	Delete proposed notes 8 & 9.
Rule 12.1.3.2 The corner of any allotment at any road intersection shall be splayed with a rounded minimum radius of 3 metres.	Oppose in part	This rule links to an assessment matter (12.1.4.2) and is mirrored in following Section (12.2) which pertains to Boundary Adjustments. Stages 1 & 2 of the Dairy Block (which were granted resource consent by SDC in December 2009) have avoided the use of splays in some instances where low speed environments are to be achieved. No exceptions have been included in this new rule to reflect the potential appropriateness to discourage splays in these instances.	Amend proposed Rule 12.1.3.2 as follows: The corner of any allotment at any road intersection shall be splayed with a rounded minimum radius of 3 metres. Except that where splays are specifically avoided (as a subdivision design element) to encourage slower vehicle speed environments and enhance pedestrian safety and residential amenity, no splay will be required.
Proposed new Standards in Appendix 13 Specifically: - For general retail, the standard has increased from 2.5 to 4.5 spaces per 100m² GFA. - For 'slow trade / bulk goods retail' a new requirement for 2.5 spaces per 100m² GFA has been created. - For food and beverage outlets, the requirement is 4.5 spaces per 100m² for the first 150m² of public floor area and 19 spaces per 100m² thereafter. - For carehomes, a new standard of 1 space per 3 clients - For Offices, an increase from 2 to 2.5 per 100m² GFA; and - For preschools, a new standard of .26 spaces per child (including drop-off and staff)	Oppose in part	The s32 report has not adequately justified the need for the new standards and/or amended standards. The plan change provides no evidence that the operative District Plan provisions are not adequate in this regard.	Delete proposed amendments to Table E13(a).