

IN THE MATTER Clause 6 of the First Schedule to the Resource Management Act 1991

AND

IN THE MATTER of a submission on Plan Change 24: Silverstream Estates Limited, Darfield

SUBMISSION ON PLAN CHANGE 24: SILVERSTREAM ESTATES LIMITED, DARFIELD

SUBMITTER: SELWYN DISTRICT COUNCIL

Dated: 30 June 2011



SUBMISSION ON PLAN CHANGE 24: SILVERSTREAM ESTATES LIMITED, DARFIELD

TO: Selwyn District Council
PO Box 90
Rolleston 7643

SUBMISSION: On Plan Change 24: Silverstream Estates Limited, Darfield

NAME OF SUBMITTER: SELWYN DISTRICT COUNCIL, Attention: David Smith c/- Selwyn District Council, PO Box 90, Rolleston 7643

STRUCTURE OF SUBMISSION

1 This submission is divided into the following four topics:

1.1 Topic 1: General Submission

1.2 Topic 2: Demand and Supply;

1.3 Topic 3: Unconsolidated Development;

1.4 Topic 4: Infrastructure.

TOPIC 1: GENERAL SUBMISSION

2 The submission opposes Plan Change 24 (PC24) in its entirety for all of the reasons that follow.

3 PC24 is based on an erroneous assumption that the current policy framework, which guides development within the Selwyn District Council area and Darfield in particular, is not adequate. The current mechanisms already provide for a sufficient level of development opportunity, direction and integration and, as such, there is no need for the provisions promoted by PC24.

4 The objectives, policies, and methods contained within PC24 fail to achieve the sustainable management purpose of the Resource Management Act 1991 (the RMA).

5 The policies and methods contained in PC24 are not the most efficient and effective means to give effect to the objectives of PC24 and accordingly such policies and methods are inappropriate.

6 The reasons for incorporating the proposed objectives, policies and methods are not adequately explained or justified in terms of any available section 32 analysis accompanying or supporting PC24.

- 7 The proposed objectives, policies and methods of PC24 are not the most appropriate means of achieving the purpose of the RMA. There has not been adequate consideration given to alternatives, costs and benefits as required under the RMA.
- 8 The population growth predictions on which PC24 is founded are not reliable and should not be used as support for PC24.

TOPIC 2: DEMAND AND SUPPLY

Lack of demand

- 9 The Selwyn District Council (the Council) is concerned that Darfield already has more than sufficient appropriately zoned land for its reasonably foreseeable needs, and there is no need for additional land to meet demand.

Consequences of lack of demand

- 10 The Council is concerned that rezoning more Living 1 land at this time would increase the oversupply of land significantly and exacerbate the issue of sporadic and disconnected development and result in the inefficient provision of infrastructure across Darfield as a whole.

TOPIC 3: UNCONSOLIDATED DEVELOPMENT

Location of site

- 11 The Council is concerned that the location of the proposed site is remote from the existing town centre and would result in an unconsolidated development that is not well integrated with the rest of Darfield.

Effects of the proposed business zoning

- 12 The Council is concerned that the proposed Business 2 zone would enable a significant retail centre to be developed at the eastern end of Darfield. This would result in adverse effects on the amenity and function of the existing town centre, and on town consolidation and the related infrastructure efficiencies. In addition, there is no certainty that all currently zoned B2 properties located off Cardale Street will be relocated to the new B2 zone and that there remains the potential for very serious reverse sensitive effects to residential zoned land from both these areas

TOPIC 4: INFRASTRUCTURE

Wastewater

- 13 In principle, the provision of a package wastewater treatment system (although it is recognised that this would be preferable to individual disposal systems) is not supported. The reasons for this include that the timing is inappropriate, given the Council

consultation process with respect to a community wide approach to the treatment and disposal of wastewater is in progress; and concerns regarding the infrastructural inefficiencies of multiple treatment systems; deficient information relating to minimum and maximum flows, water quality at discharge, waste product treatment and disposal methods, scheme materials and installation techniques, operation and maintenance costs, and lifecycle costs (including renewal of components) are not known.

Water Supply Information

- 14 The two wells from which the Council is seeking supply be secured may not be able to provide water to the existing Living zoned land within Darfield (capacity around 1,750 households). This increase in Living 1 zoned land could not be supported in terms of water provision at this stage because an adequate water supply is unavailable.
- 15 The plan change application also identified using water from Kirwee as an option. The conveyance of water from Kirwee to service the plan change area is not supported, due to the inefficiency of such conveyance and the potential cost burden on other scheme users (if the infrastructure was to be vested in the Council at some stage in the future).

Transport

- 16 Concerns include: utilisation of existing zoned land, in particular L1, appears more beneficial and efficient to Darfield than that proposed from both a wider District planning and traffic perspective; uncertainty about development intensities and related traffic generation and effects; possible eventuality of alternative Darfield town centre and is relying on limited access to the surrounding network; no development staging provided to determine how infrastructure will be efficiently and effectively provided; lack of appreciation or understanding on the roles that connections to Telegraph Road and Creyke Road could or would play; and confusion on the intended access arrangements and loss of service expectations being provided along Telegraph Road and Creyke Road relating to eventuate in "urban" form and immunity.

DECISION SOUGHT

- 17 The submitter seeks the following decision from the local authority:
 - 17.1 That the plan change be refused in its entirety; and
 - 17.2 In the alternative, all consequential, additional or other amendments to the provisions of the plan change necessary to give effect to the intent of this submission.

The submitter wishes to be heard in support of this submission.

If others make a similar submission, the submitter will consider presenting a joint case with them at the hearing.

Signed:


David Smith, the duly appointed representatives of the submitter

Date:

30/6/11

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