

Proposed Plan Change 25 - Porter Heights					
Summary of Decisions Sought					
Introduction					
The period for making submissions to Change 25 to the District Plan closed on 24 September 2010. The second stage of the public submission process where people have the opportunity to make further submissions closed on 15 November 2010. However Council Further submissions give the opportunity for the public to either support or oppose the submissions received and summarised or aspects of these submissions. Please note it is not another opportunity to make fresh submissions on the Plan Change itself, as a further submission can only relate to a submission which has already been lodged.					
The further submission Form 6 is available at all Council offices and online at: pdfs/submission-forms				http://www.selwyn.govt.nz/services/planning/planning-forms/submission-forms-	
THE SUMMARY					
Submitter	Submission No.	Decision No.	Request	Decision Sought	Wishes to be heard?
Castle Hill Ltd	2308	1	Oppose	That the application be declined in its entirety.	Yes
		2	Oppose	AS an adjoining High Country Station we have concerns the Stations farming activities, residential uses, and quiet enjoyment of our land will be adversely affected by the actual or potential effects from the scale, character and form of developments being proposed for the new ski-area sub-zone. The level of controls provided for in PPC 25 is inadequate to avoid, remedy, or mitigate the consequent significant adverse effects on this area of outstanding natural landscape and high natural values. There is a very real probability that Castle Hill Station's use of its land and farming activities is actually or potentially affected by any failure of, or any negative effect of new developments not performing or acting as anticipated by those controls proposed in PPC 25	
		3	Oppose	Insufficeint information.All of the reports submitted with the Plan Change are feasibility options with presumptive findings only and do not contain sufficient credible information to accurately assess the true nature or ability of the structures, buildings, and system designs.to successfully operate within the constraints imposed by the alpine location, the rugged and steep terrain, the extreme seasonal, climatic and temperature variations, and the geological and hydrological features of the locale It is premature to make zoning decisions which will ultimately determine the veracity of building / structure / traffic safety and discharge outcomes for public assets, by relying solely on promises to provide further engineering assessment or detailed final design solutions once the Plan Change performance criteria have been determined and incorporated into the SDP, commonly as 'controlled activities' which limit discretion on additional concerns	
		4	Oppose	Castle Hill Ltd is of the opinion PPC 25 would undermine the integrity and consistent governance of the following Plans and Statements, and fails to adequately give regard to the matters contained therein: 1. The Operative Selwyn District Plan (SDP). - Protecting this location from inappropriate subdivision, use and development: this Plan Change is inconsistent with nearly all of the objectives, polices and rules which currently apply to areas of 'Outstanding Natural Landscape' within the SDP for the proposed ski-field sub-zone. - Water, vegetation and ecosystems, land use, natural hazards, transport, and residential density and growth at this location: this Plan Change is incompatible with most of the objectives, polices and rules which currently apply to the Rural (High Country) zone within the SDP which underlay the proposed ski-field sub-zone. 2. The Waimakariri River Regional Plan (WRRP), - Waterbodies must be maintained in a natural state: this Plan Change is inconsistent with the objectives, polices and rules within the WRRP which currently apply to the Porter River, and the Porter and Crystal Streams which are classified as in a high 'natural state' with very 'high aquatic habitat'. 3. The Canterbury Regional Policy Statement (CRP) - Beds of rivers, soils and land use, landscape, ecology and heritage, and settlement patterns: this Plan Change is contrary to or incompatible with the objectives and policies within the CRP as they relate to residential density, access and location, and protecting the high levels of naturalness, biological diversity, and natural character of the landscape that are present over the proposed ski-field sub-zone.	

		5	Oppose	Any disposal of such lands for a strictly commercial purpose (i.e. not for pastoral or conservation use) requires a transparent public consultation process and Castle Hill Ltd believe it is premature for PPC 25 to be considered by the Selwyn District Council until robust public debate has occurred on the merits or otherwise of removing the ski area sub-zone from the conservation estate, which as a consequence would curtail free public access and use.	
		6	Oppose	PPC 25 postulates 600,000 visitor's per annum to the ski field area, with 40% visiting the Castle Hill basin outside of the peak winter ski season . This 1,200 % increase in visitor numbers coming into the basin will incrementally increase visits to the other adjacent DOC conservation areas This will exacerbate the demands on the existing DOC ablution facilities and carparking areas at Kura Tawhiti and Cave Stream to service this increased public accessibility onto conservation lands. In addition, Castle Hill village also lacks any form of Council amenity services and ablutions, and the State Highway between Lake Lyndon and Cave Stream has only one formed road reserve pull-off area for vehicular use. Castle Hill Ltd are of the opinion there has been no consideration within the proposed Plan Change of the consequences and likely adverse effects from the amplified visitor numbers generated by the proposed ski area developments within the Castle Hill basin globally, particularly with regard to the lack of adequate itinerant pull-off parking on the State Highway carriage-way, trespass and the interference of the legitimate farming activities of adjoining Stations, and the lack of adequate public amenities to cope with the inevitable surge in visitor numbers.	
		7	Oppose	The Plan Change also grossly underestimates the impact of doubling the traffic generation on the State Highway to service the expansion developments proposed (average – 1,684 vpd increasing to 3,669 vpd at winter peak) . The ski area access is within an alpine pass renowned for winter road closures (15% of the 2009 ski season), continually iced and snowbound roads, poor road visibility (fog, low cloud and whiteout), gale force winds, no mobile phone reception or signal, 24/7 road clearing and surface maintenance, difficulties using helicopters in inclement weather, and problematic emergency vehicle access with no viable alternative routes out of the basin. As the closest permanent residence in the Castle Hill basin we are regularly required to respond 24/7 to the numerous unreported vehicle accidents / incidents in this locality and we believe the risk and hazard analysis on the State Highway in PPC 25 for crash exposure, traffic management, sight line distances, turning lane and pull-off lane requirements (both east and west bound traffic), the affect of extreme climatic effects, and emergency response abilities, are grossly understated, particularly during the peak winter ski season.	
		8	Oppose	The nominal human footprint of the existing Porter Heights ski field structures / infrastructure is already widely visible from State Highway 73 and within the Castle Hill basin (as are the Cheeseman, Broken River, Craigieburn Valley ski fields). The further imposition of multi-storey accommodation and residential buildings, gondola's and chairlifts, infrastructure pipework and galleries in existing watercourses, roading / bridges and tracking, and wastewater and stormwater structures and buildings, resultant from developments proposed in PPC 25 will be dominantly conspicuous in this mountain landscape and as a consequence will intensify the loss of landscape intactness, character, naturalness and alpine sequencing, on this region of outstanding high country landscape	
		9	Oppose	The site being promoted is identified as an 'Outstanding Natural Landscape' and PPC 25 seeks to remove and change this zoning in the SDP. The lifting of the current SDP controls with the new controls as proposed in PPC 25 to accommodate do not address any of the actual or potential effects of activities in a manner which will mitigate, avoid or remedy the significant adverse effects on this high value landscape with national, regional and local significance. Castle Hill Ltd are of the opinion the lessening of the environmental performance standards and bulk and location controls currently in the SDP proposed within the Plan Change will in all certainty set an inescapable precedent for those other under-developed ski areas located on conservation estate land in the Castle Hill basin as they all share the same intrinsic landscape and natural values, and site characteristics with the Porter ski-area sub-zone.	

		10	Oppose	<p>The Crystal and Porter Streams, and the Porter River (above SH73) are classified in the WRRP as high 'natural state' with very 'high aquatic habitat', which is a rarity now in the Canterbury high country. As such, any risk of improperly treated discharges or bulk flows being carried into these fragile and pristine waterways would have significant adverse effects, and the maintenance of the 'state of naturalness' required by the WRRP could not be achieved. In addition, the natural character and ecological values of the indigenous vegetation and habitat of indigenous fauna present in this locality have already been recognised as regionally and nationally significant in the WRRP, the CRP Statement, the Canterbury Biodiversity Strategy, Department of Conservation Canterbury Conservation Management Strategy / Plans, and the Operative SDP. PPC 25 also freely admits the large scale disturbance of the Crystal basin as a permanent ski area is a significant adverse effect and represents a large scale negative ecological and biodiversity outcome of this ski-field sub-zone development proposal which cannot be mitigated, remedied or avoided. The Castle Hill basin cannot sustain the loss of the second largest unmodified alpine basin environment along with several rare pristine sub-alpine valley headwater aquatic environments, which cannot be replaced in the Torlesse/Craigieburn ecological District. PPC 25 offers no effective or viable 'environmental compensation' or commensurate 'public benefit' to offset the loss of these 616 hectares of conservation land with intrinsic landscape and natural values.</p>	
		11	Oppose	<p>Castle Hill Ltd has to ask why we need to further pollute the pristine land and sky-scapes of the Castle Hill basin to service the fickle overseas tourism market for purely commercial gain, especially where the ski field profits will not be retained in the Selwyn District or directly support local businesses. This locale does not need another partially completed township. Would it not be more beneficial to complement the existing Castle Hill village development with the on-mountain commercial and residential developments being proposed in PPC 25? The ski-area improvements could then be assessed within the framework of the existing SDP to ensure they complement the established visual character and natural values of this unique high country basin.</p>	
		12	Oppose	<p>Any expansion of existing residential developments and tourism resorts can only occur within the confines of the original approved development plan. Otherwise new developments should only occur in or around existing townships, where the utility services are already present and amenity values are appropriate for the increased activity and densities. PPC 25 proposes a dedicated on-mountain village with 45 freehold residential chalets, accommodation for 3,700 people with commercial, retail and entertainment centre's. The majority of these commercial, residential and accommodation structures proposed by the Plan Change will be large multi-storey buildings, and globally the development area has an elevated level of potential natural hazards</p>	
		13	Oppose	<p>When regard is given to Part II of the Resource Management Act 1991, Castle Hill Ltd considers that this Plan Change is contrary to sections 6 (b) and (c), and 7 (b) (c) (d) (f) (g) and (h), and having particular regard to public health and safety and the well-being of people and communities and the natural environment, it will not constitute sustainable management as defined in section 5 of the Resource Management Act 1991</p>	