

David Hattam

From: Lieuwe <lieuwe@clear.net.nz>
Sent: Thursday, 28 April 2011 6:07 p.m.
To: Submissions
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Subject: PPC#29 Submissions attached (this time)
Attachments: 2011.04.28 LD Submission re PC 29.pdf

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Hi David

Private submission attached (this time!). We never really got the chance to thrash the issue out in our committee meeting (Southbridge Advisory Committee) hence this private submission. The submission focuses somewhat on the underlying rationale in the background report and the obvious differences between small townships and large towns with pretensions. More thought in my view needs to be given to the role of small towns and how these proposals will impact on them. Incentives not hurdles.

Regards

Lieuwe

**Submission on Publicly Notified Plan Change 29
Selwyn District Plan**

28 April 2011

Selwyn District Council
P.O.Box 90
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Canterbury

Submitter: Mr Lieuwe Doubleday

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The Submitter

1. **Opposes** the Selwyn District Council's proposed Plan Change 29 (as currently presented) to the extent documented in the submission below.
2. **Wishes to be heard** on this submission;

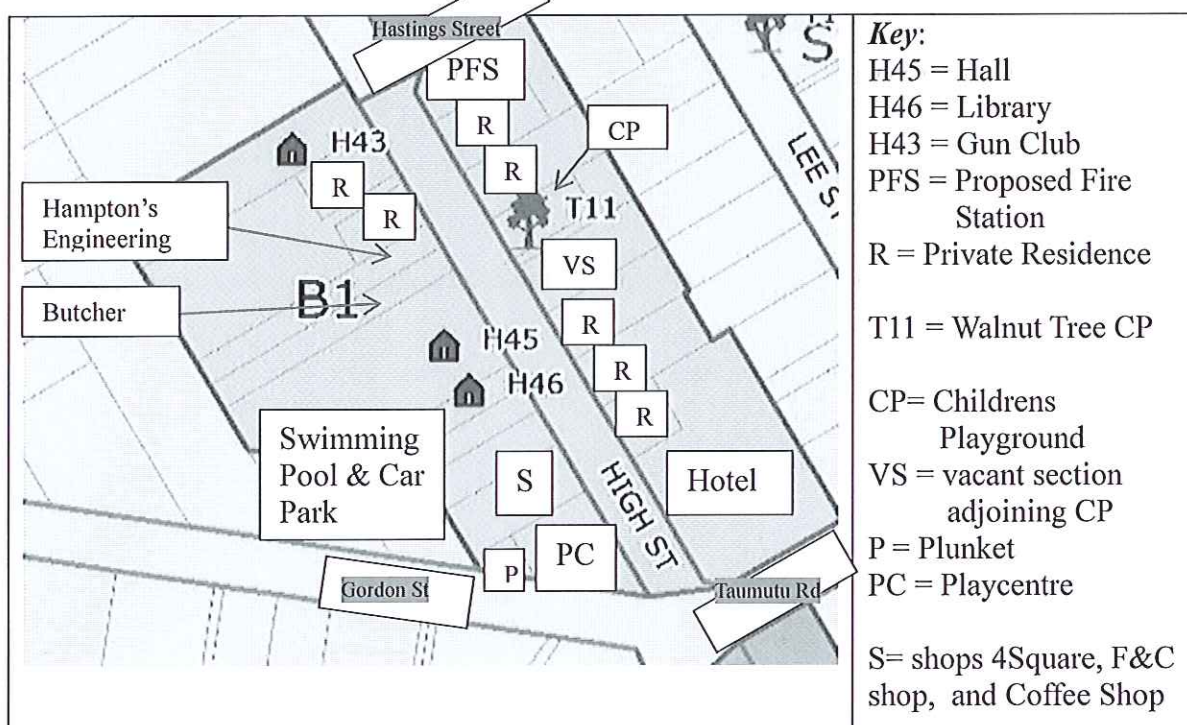
Submission Proposed Plan Change 29 Design of Development in Business 1 Zones

Consultation Process

3. A direct approach should have been made to the Southbridge Township Committee ("SAC") with respect to the proposed plan change, and the absence of any consultation with the SAC before the Plan Change was notified is regrettable. The SAC has only recently been made aware of the Plan Change and has been unable to consider the matter as a committee in time for close of submissions.

B1 Southbridge Context

4. The Business 1 zone in Southbridge is situated either side of the High Street (the main street) running from the junction with Hastings Street (North end) to the junction with Gordon Street and Taumutu Road (South end).



Key Features: B1 zone is dominated by

- (a) public spaces and amenities – Hall, Library, Swimming Pool and adjacent car park space, Children's Playground and vacant section adjoining the playground (to be purchased by the township, as a reserve).
- (b) Heritage buildings - Hall, Library, Gun club

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- 1-0 Proposed Plan Change 29 ("PPC29") is opposed in its entirety (as currently drafted) and should be withdrawn;

In the alternative PPC29 should be

- 2-0 Amended to exempt the Business 1 zone in Southbridge and other small rural towns from its application; and/or
- 3-0 Amended by the insertion of a \$500,000 *de minimus* threshold to exempt existing businesses in small rural townships from compliance with the Plan Change with respect to additions/alterations having a total value of less than \$500,000; and/or
- 4-0 Amended to limit the application of PPC29 only to new large scale developments in small rural townships.

Rationale:

- 5-0 An assumption underlying the rationale for the Proposed Plan Change is that one model fits all and that the drivers for change are uniform across the district. Analysis of the Southbridge position will identify clear points of difference from the assumptions and objectives acting as drivers for the Proposed Plan Change. **The Proposed Plan Changes makes no allowance for the particular circumstances and needs of smaller townships.**
- 6-0 **Points of difference** in Southbridge compared to the issues raised in the *PLAN CHANGE 29: DESIGN OF DEVELOPMENT IN THE BUSINESS 1 ZONE Background Report* include:
- (a) Clearly defined town centre;
 - (b) Community function dominates over commercial function;
 - (c) Absence of critical mass population density to drive commercial development;
 - (d) "Rural form" as opposed to "urban form" (a function of 'scale');
 - (e) Compact Business 1 zone; and
 - (f) Alterations will dominate over new development.

Commenting on each in turn.

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8-0 The concept of a **'town centre'** is driven in Southbridge's case by significant public spaces centred around the Hall, Swimming Pool and playground (see **B1 Southbridge Context** above). Public amenities and spaces predominate and the demand for commercial linkages to these public spaces are entirely peripheral and incidental. The point here is that Southbridge currently enjoys a 'town centre' where the same cannot be said for Rolleston, and perhaps Lincoln, or Prebbleton. If one of the objectives of the proposed plan change is to create opportunities for the development of 'town' centres then Southbridge is ahead of the game and should be exempted from the change.

9-0 **Community amenities dominate** the town centre as opposed to commercial activity. The following description in the background report detailing the interactions in a *town centre* illustrate only too well that Southbridge has yet to arrive.

*"Centres are defined by the quality of the retail and commercial tenants, public space, and the interface between that space and surrounding buildings" ...and later.... A successful and vibrant town centre is a complex and rich mix of uses such as amenity space, community uses, shops, restaurants, outdoor dining and stalls, places to rest, offices and housing."*¹

In our view the Council should be considering ways in which townships such as Southbridge can develop the "critical mass" necessary to make such a description viable. **Plan change 29** is not in the ball park. **Viability** is a function of critical mass. Plan Change 29 doesn't speak to this issue and in our view, if anything, it is likely to hinder developments.

10-0 **Population density** in Southbridge lacks the *critical mass* to drive commercial retail development.

11-0 **'Rural form' is not 'urban form'**. Southbridge is not a place of 'inner city apartments' where people walk out of their apartments to work or to eat breakfast in the local brasserie, or go out to buy the latest accessories at a Ballantynes equivalent. In terms of walkability it would take less than five minutes to walk the length of the Business 1 zone along the High Street from the corner of Gordon Street to Hastings Street. However, for township residents and more so for the rural residents, access to the civic centre of the town by vehicle is essential. It's not as if there are alternatives. Provision for parking is made along the 'wide' High Street and in the centre of the town in the carpark adjacent to the swimming pool and hall. There is little in the Background Report to the Proposed Plan Change which resonates with Southbridge. Certainly the statement below illustrates the degree of unreality and lack of connectedness with the Southbridge scene.

¹ Paragraph 2.1 page 5 PLAN CHANGE 29: DESIGN OF DEVELOPMENT IN THE BUSINESS 1 ZONE Background Report ("Background Report")

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11-0 Rural not Urban form/-

There is a widespread acceptance of the role of urban form in promoting health. In particular, there is an appreciation of the damaging side effects of car dependent development which makes walking and cycling more difficult, either through the location of facilities in remote locations (out of reach of walking) or through the lack of provision for active modes of transport.²

Surely the point is that the desire for 'urban' form is a function of scale and the scale of activity in Southbridge, in part because of Selwyn District Council planning and funding choices, is just too small for Plan Change 29 to speak with any real relevance.

12-0 **Compact business 1 zone.** As the map in the B1 Zone Southbridge Context above shows commercial activity in the zone is very limited. The Background Report states at 2.1

Commercial development is an important component in this mix. It brings people in, adding life and vibrancy; reasons to visit the centre and creates an anchor for the public life of a town. It is re-enforced by good public space, community services and other activities which add reasons to visit the centre and allow residents the convenience of being able to accomplish daily errands in a single trip.³

The Selwyn District Council **has not** created an I-Zone in Southbridge's back yard. Nor has the Selwyn District Council incentivized commercial growth and residential development in Southbridge as it has done in Rolleston. Nor has the Council invested significant public funds in Southbridge as it has in Rolleston. The reality is that the 'commercial' sector in Southbridge is small and the increased compliance costs associated with any new development under the Proposed Plan Change 29 (even assuming they had some remote relevance in the Southbridge context) would in all likelihood act as a deterrent as opposed to an incentive for change. Southbridge needs opportunities not hurdles.

13-0 **Alterations** PPC29 assumes a critical mass of activity where the Background Report statement above is more true than not. The size of a community, proximity to other communities, and the degree of interaction between businesses and residents is an important factor in making commercial decisions. Where the population is small and the business centre is smaller still improvements to existing businesses are more likely than major developments of new initiatives and that being the case it is imperative that rule changes do not act as a disincentive to improvements to existing businesses.

² Paragraph 2.3.5 page 14 Background Report

³ Paragraph 2.1 page 5 Background Report

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- 14-0 **Uniformity by Conformity** – the degree of prescription in PPC29 rule 16 for small developments including residential development is unnecessarily restrictive and the lack of flexibility for existing businesses and residents is unhelpful. **There is a real focus on ‘retail’ in PPC29. Southbridge currently is not a retail mecca and there are businesses in the zone, which have a prime focus other than retail.**
- 15-0 **Summary** – The Background Report supporting PPC29 speaks largely to urban (not rural) growth situations e.g. Rolleston, where (a) the Council is by its actions actively ‘incentivising’ growth, and (b) responding to the undesirable planning effects of ad hoc developer lead development. The assumptions and issues underlying the one size fits all PPC29 model ignores the clear **points of difference** identified above in relation to Southbridge and other small rural townships and accordingly PPC29 should be rejected or modified as outlined above for these reasons.