

## Submission on Plan Change 54

To: Selwyn District Council

Attention: Ben Rhodes, Strategy & Policy Team Leader

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Thank you for the opportunity to submit on Plane Change 54, a private plan change request from Ballymena Holdings to the Selwyn District Council. I understand that the private plan change seeks to rezone 31.32ha of Rural Outer Plans land near Springfield to a Residential Living 2 zone (rural residential type development).

The specific provisions of the proposed plan change that my submission relates to are:

- a. Demand for low density housing
- b. Earthquake fault
- c. Water and discharge
- d. Landscape and amenity values
- e. Sustainable use of productive land

I **oppose** Plan Change 54 for the following reasons:

- a. Demand for Low Density Housing

The Private Plan Change Request report suggests:

*“1.2.2 There is no other similar ‘low density’ residential zone in the vicinity of the Springfield Township. The nearest such zone is at Darfield being some 22- 23 km to the southeast from Springfield. The applicant company is of the opinion that there is a perceived market need for such a zone given the anticipated development growth in this northwest corner of Selwyn District. This is primarily in respect of the nearby Fonterra processing plant located between Springfield and Darfield, and the contemplated ski field development to be undertaken as an extension to the existing Porters ski field.”*

There is a subdivision on Rilco Place in Springfield, where many sections have remained unsold for a number of years. The growth spurt on Princes Street in Springfield the past three years, suggests a demand for affordable housing. There are to date numerous sections within the town itself that remain undeveloped.

What evidence is there to suggest to demand for low density residential/ lifestyle blocks relating to Fonterra processing plant and the contemplated Porters ski area development?

An understanding of the employment capacity of these industries perhaps suggest a demand for affordable housing rather than the more expensive lifestyle type properties proposed by Plan Change 54.

b. Earthquake fault

Planning maps show a possible fault dissecting the proposed development. Despite the findings of the Geotech report, and in light of recent earthquake activity in Canterbury, it is unthinkable that anyone would suggest residential development on a possible fault line.

c. Water and discharge

The Planning Report suggest that the proposed development will require a restriction of 2000L per day to existing residential users. As it is, the Springfield water supply is inadequate and requires significant upgrades to meet existing use. The extra use pressure of up to 14 lifestyle blocks is not appropriate.

The Havelock North Drinking Water Inquiry identified six principles of drinking water safety for New Zealand

- A high standard of care
- Protection of the system from source to tap
- The need for multiple barriers
- That change precedes contamination
- The need for personal ownership of a system
- Preventative risk management

Among its many recommendations the Havelock Report suggests an amendment to s 6 of the RMA, the protection of drinking water sources, as a matter of National Importance. The inquiry were told that protection of drinking water sources has not been “front of mind” of RMA decision makers.

The Plan Change Report discusses Canterbury Land and Water Plan’s permitted activity status for onsite wastewater and discharge [5.2.8].

The proposed lot sizes do not meet condition 2. The addition of up to 14 new individual septic systems upstream of Springfield’s water supply from the Kowai River places an unnecessary risk of contamination.

This proposed development is entirely inconsistent with the Havelock Report recommendations. The development does not provide for a high standard of care nor does it provide for preventative risk management. It also highlights how change such as further development may precede contamination.

d. Landscape effects and amenity value

Mr Head’s Landscape assessment under states the significance of the effects of Plan Change 54 on existing residents. Mr Head’s assessment assumes that because there are few people living in the area, the effect of this development is of minor concern.

People have purchased rural land to maintain the sense of space around them and views of the mountains. Given the size of the proposed lots and the proximity to the mainland railway line, it

cannot be assumed that these lots will be utilised for quiet rural living or that rural landscape amenity values will be maintained. Instead there is potential for more industrial uses, which would undermine landscape or amenity values of the area.

e. Sustainable use of productive land

The Plan Change Report [9.1] states:

*“This rezoning request is seen as being a sustainable and efficient use of land adjoining the existing urban boundary at Springfield in providing for a different form of low density residential development that currently is not provided form (for?).”*

Urban design principles for sustainability and land use efficiency are underpinned by reducing the environmental footprint of subdivision and the dependence on fossil fuels, while retaining productive land for food production. The proposed low density residential development is not consistent with any principles of sustainability.

The Planning Report discusses Policy B4.1.3 which states:

*“To allow, where appropriate, the development of low density living environments in locations in and around the edge of townships where they will achieve the following:*

- A compact township shape;*
- Consistent with preferred growth options for townships;*
- Maintains the distinction between rural areas and townships;*
- Maintains a separation between townships and Christchurch City boundary;*
- Avoid the coalescence of townships with each other;*
- Reduce the exposure to reverse sensitivity effects;*
- Maintain the sustainability of the land, soil and water resource;*
- Efficient and cost-effective operation and provision of infrastructure.”*

The proposed development is inconsistent with maintaining a compact town shape the size of the land parcel and the number of lots proposed is similar to the existing town size therefore in no way is compact.

The proposed development does not reduce the exposure to reverse sensitivity issues. The size of the lots suggests the potential for industrial uses which may cause future reverse sensitivity issues.

The proposed development is inconsistent with maintaining the sustainability of the land, soil and water resource. The Planning Report states:

*“In this context it is considered that the proposed plan change will not take out of active production land that has a particularly high level of productive versatility and therefore this application is seen as not being in conflict with Policy B1.1.8.”*

Cumulative development of rural land into lifestyle blocks is a poor use of land and results in overall loss of productive land. Considering future effects of climate change, retaining the productive capacity of land will be necessary.

Finally, the sprawling nature of the proposed development reduces the ability to provide efficient and cost effective operation and provision of infrastructure.

In conclusion:

I request that the council decline Plane Change 54 for the stated reasons.

I would like to be heard.

Thank you for the opportunity to submit.

A handwritten signature in blue ink, appearing to read 'Nicky Snoyink', is displayed on a light blue rectangular background.

Nicky Snoyink

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