



File No. 206/1

16 March 2018

Selwyn District Council

P O Box 90

ROLLESTON 7643 **Emailed:** Benjamin.Rhodes@selwyn.govt.nz & jonathan@planzconsultants.co.nz

Attention: Jonathon Clease (c/- Planz Consultants)

Dear Jonathon

APPLICATION FOR A PLAN CHANGE REQUEST TO THE SELWYN DISTRICT PLAN – PC54.

BALLYMENA HOLDINGS LTD

ANNAVALE ROAD/POCOCK ROAD, SPRINGFIELD (LOTS 1 & 2 DP 400509)

I refer to your letter of 5 February 2018 on behalf of the Selwyn District Council requesting that further information be provided in respect of the above District Plan request. Following is the information being provided with the numbering of it generally corresponding to that in your letter:

1. Natural Hazard Risk

- 1.1 On the matter of the potential faultline that is shown on the District Plan Planning Maps as traversing across the subject land, the applicant company has had an independent geotechnical report prepared as requested. This report was prepared by the office of Eliot Sinclair & Partners Ltd; and in particular by Mr Firas Salman (Geotechnical Engineer) and reviewed by Mr John Aramowicz (Senior Civil & Geotechnical Engineer). This report, dated 12 March 2018 and having the reference 439282/Rev. A, is attached for your information.
- 1.2 By utilising the 'Risk-Based Approach' in this report, it is assessed that if this identified potential faultline is in fact a continuation of the previously identified Springfield Fault; then it is estimated to have an average Recurrence Interval ('RI') of 7,200 years. In the accompanying 'Appendix A' that forms part of this report, it can be seen that when also taking into account the 'Uncertain' status of this potential fault, and the range of differing Building Importance Categories ('BIC'); the resource consent activity status for establishing essentially any form of dwelling on the subject land (comprising BIC's 1, 2a and 2b) is that of a permitted activity.
- 1.3 Accordingly, it can be concluded that the ability to establish a rural-residential style development on the subject land can be undertaken without having to take into account any specific earthquake-related matters due to the existence of this 'potential' faultline as shown on the District Planning maps.
- 1.4 The above assessment undertaken by Eliot Sinclair & Partners Ltd also appears to be in accord with the document '*Guidelines for using regional-scale earthquake fault information in Canterbury*' prepared by

: 1

GNS Science dated December 2015. This document also refers to the 'Risk-Based Approach' in terms of establishing buildings in any suspect faultline locality and the class categories of such buildings. On this basis the validity of the Eliot Sinclair & Partners Ltd report can be relied upon.

- 1.5 On this basis it is recommended that there should be no additional building controls imposed on any rural residential development established on the subject land beyond those existing controls that typically would apply in this Springfield locality not impacted upon by any faultline.

2. Canterbury Regional Policy Statement Assessment

- 2.1 In the context of the Canterbury Regional Policy Statement ('RPS') the following objectives and policies from Chapter 5 (*Land-Use and Infrastructure*) and Chapter 11 (*Natural Hazards*) are seen of particular relevance to the current plan change request. The assessment of each section of those objectives and policies is inserted as appropriate:

Land-Use and Infrastructure

Objective 5.2.1 Location, design and function of development (Entire Region)

Development is located and designed so that it functions in a way that:

- 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and*

- 2.2 A feature of the subject land is that it is bounded by the existing Springfield urban area to the south east (being on the other side of Pocock Road), Annavale Road to the south west, and the Midland Railway line to the north east. These physical containment factors collectively will ensure that the contemplated rural-residential form of urban growth will be undertaken in a consolidated manner.

- 2.3 This location and general form of urban growth has been contemplated in the following Council documents:

- a. *Selwyn District Plan*: In the Township Volume the following applies specifically in respect of the urban growth of Springfield:

Policy B4.3.88

Encourage any new Living zone to occur on the north side of SH73 and avoid new Living or Business 1 Zones:

- *East of the existing Living 1 zone;*
- *On the south side of SH73; or*
- *North of the Midland Railway Line.*

- 2.4 The subject land complies fully in respect of the above in terms of being:

- west of the existing Living 1 Zone, and
- on the north side of SH73, and
- south of the Midland Railway Line.

- 2.5 When taking the above District Plan matters into account, it can be concluded that the subject land (and indeed other parcels of land say south of Annavale Road) has for many years been 'foreshadowed' for providing a future urban growth option.

b. Malvern Area Plan 2031 ('Area Plan').

2.6 Within the Area Plan, the '*Springfield Opportunities and Issues / Preferred Future Development Areas*' plan (being Figure 27 on page 107); the entire subject land is specifically identified as area 'SPR 2'. The anticipated development is noted as being '*Low-Density Residential*'. This term is not defined in this Area Plan, but given the over-arching focus of the matters discussed within it; such a term would not be expected to be finely defined given the 'high level' of discussion that this Area Plan seeks to generate.

2.7 On the matter of 'urban form', the Area Plan for Springfield notes the following:

'State Highway 73 and the Midland Line railway are strong boundaries to contain the urban form of the township to the north and to protect the productive capacity and amenity attributed to the surrounding rural environment'. (page 108)

2.8 Conversely the opposite is also noted as:

'Development south of State Highway 73 should be precluded to avoid undermining the amenity values attributed to the Russell Range (Malvern Hills Zone and Malvern Hills Outstanding Natural Landscapes) and township severance that would give rise to poor connectivity and integration with the wider settlement.' (page 108).

2.9 Both of the above statements in the Area Plan essentially confirm the urban growth preferences that have for many years being contained in the District Plan (Townships Volume).

Regional Policy Statement continuation

Land-Use and Infrastructure

Objective 5.2.1 Location, design and function of development (Entire Region)

Development is located and designed so that it functions in a way that:

2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:

(a) maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;

2.10 In order to be in accord with this second aspect of Objective 5.2.1 by creating a minimum average dwelling density of 1 per 2 ha, this will provide a degree of assurance in terms maintaining a reasonably low residential density, and therefore the ability to retain a 'continued sense of ruralness' on the western boundary of the existing Springfield urban area.

2.11 By specifying a maximum permitted dwelling footprint area (500m² as is being proposed as part of this plan change request), this will further ensure that the open spaces created between dwellings on adjoining/nearby allotments will dominant the local environment rather than the future dwellings themselves.

(b) provides sufficient housing choice to meet the region's housing needs;

2.12 At present for the Springfield township the sole residential availability is the Living 1 Zone, being the zone that encompasses the entire urban area. The Living 1 Zone specifies a minimum allotment area / dwelling density of 1 per 800 m² (subject to being able to treat and dispose on-site the generated wastewater). And beyond the urban area as defined by the Living 1 Zone, the only other residential option is in the surrounding Outer Plains zone that requires a minimum dwelling density of 1 per 20ha.

- 2.13 Accordingly the requested use of the subject land to allow for a proposed dwelling density of 1 per 2ha will provide an alternate option where people may wish to live in/adjacent to the existing Springfield urban area, while still having a semi-rural lifestyle option whether it be for growing crops/trees and/or having grazing animals for economic and/or lifestyle purposes.

(c) encourages sustainable economic development by enabling business activities in appropriate locations;

- 2.14 This policy provision is not applicable given that the primary purpose of any Living Zone tends to be the provision of residential housing while typically also having a limited provision for home-based commercial activities.

(d) minimises energy use and/or improves energy efficiency;

- 2.15 This policy matter is also not very applicable except insofar that the subject property is in relatively close proximity to the existing commercial and community services that are currently available within the central area of the Springfield township.

(e) enables rural activities that support the rural environment including primary production;

- 2.16 With the creation of allotments having a minimum average area of 2 ha, this will as noted above in paragraph 2.10 retain a sense of ruralness for this immediate rural area. This may include for example say a 'cottage' scale activities that could continue to rely on the productive qualities of the subject land in terms of water availability, soil quality & type etc.

(f) is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;

(g) avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;

- 2.17 In this case the only infrastructure that could be deemed as being 'regionally significant' will be the nearby SH73 that connects Central Canterbury with the West Coast. As noted in the initial transport assessment prepared by Novo Group for this plan change request, and the updated crash data as per paragraph 5.1, it can reasonably concluded that the establishing of this new rural-residential area will not give rise to any adverse effects on the continued effectiveness and efficiency of SH73.

(h) facilitates the establishment of papakāinga and marae; and

- 2.18 Not applicable in this case.

(i) avoids conflicts between incompatible activities.

- 2.19 The main source of incompatible activities that may currently exist are those associated with the operation of the existing Midland Railway Line. To avoid the potential incompatibility situation arising in this case, any future dwelling to be established on the subject land will be required to be established a minimum of 80 metres from the property boundary shared with this railway corridor. This significant separation distance is to ensure that the levels of noise and vibrations arising from the operation of railway services will have only a less than minor impact on future residents. The impact of this separation distance on the subject property is highlighted on the ODP where this setback area is denoted.

- 2.20 In respect of the existing properties on the other side of Annavale Road from the subject land (being the west side), there are a number of existing dwellings on relatively small allotments in a rural context. On this basis I believe that the potential for reverse sensitivity effects arising on those nearby properties as a result of the subject land being developed for rural-residential purposes will be very remote.
- 2.21 It is noted that the Selwyn District Council has issued a land use consent for a honey processing plant to be established on the property 94 and 106 Annavale Road (having the Council reference: RC 165220). This is proposed to be a sizeable development of 2,087m² and have a potential staff of 30. For your information, the approved documentation for this approval is attached. In this case, I am of the opinion that reverse sensitivity issues do not arise as the operation of this proposed honey processing activity is protected by conditions of approval imposed as part of the resource consent granted by the Council.

Policy 5.3.1 Regional growth (Wider Region)

To provide, as the primary focus for meeting the wider region's growth needs, sustainable development patterns that:

1. *ensure that any*
 - (a) *urban growth; and*
 - (b) *limited rural residential development**occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;*
2.

- 2.22 In this context, I contend that the matters noted within Policy 5.3.1 have been covered in the assessment of the various matters contained in the preceding paragraphs 2.2 – 2.21 in respect of Objective 5.2.1. Accordingly, no further assessment in respect of the matters contained in this Policy 5.3.1 is deemed necessary.

Policy 5.3.5: Servicing development for potable water, and sewage and stormwater disposal (Wider Region)

Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:

1. *avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and*
 2. *requiring these services to be designed, built, managed or upgraded to maximise their on-going effectiveness.*
- 2.23 The provision of servicing will be an integral component of any rural-residential development. Due to the lack of any existing Council or private reticulation, the treatment of both wastewater / sewage and stormwater will need to be undertaken on-site. With their proposed to be an average minimum allotment size of 2 ha (and a minimum absolute area of 1 ha), this will ensure that there is sufficient land area available within each new allotment for these servicing facilities to be installed. The design and installation of such servicing will be subject to the building consent process so ensuring the long term effectiveness of these important facilities.
- 2.24 The one further infrastructure service that impacts significantly on human health is the provision of a potable water supply. Such a supply is via the existing Council Springfield water supply scheme. The

Council has advised that the subject land being developed for rural-residential purposes is able to be provided with potable water on a restricted supply basis; with that restriction limiting the amount of water available to every dwelling to 2,000 litres daily.

Natural Hazards

Objective 11.2.1: Avoid new subdivision, use and development of land that increases risks associated with natural hazards

Policy 11.3.3 Earthquake hazards

New subdivision, use and development of land on or close to an active earthquake fault trace, or in areas susceptible to liquefaction and lateral spreading, shall be managed in order to avoid or mitigate the adverse effects of fault rupture, liquefaction and lateral spreading.

- 2.25 The geotechnical report prepared by Eliot Sinclair & Partners Ltd highlights that notwithstanding a potential faultline may exist below the subject land, the RI is estimated to be sufficiently long term being greater than 7,500 years. Such a low risk factor will ensure that the potential of the land being subject to any earthquake event is of an extremely low probability. Accordingly, the ability for the subject land to be developed for rural-residential purposes will be in accord with the above objective and accompanying policy.

3. Malvern Area Plan 2031

- 3.1 In the context of the Malvern Area Plan ('Area Plan') your comments in the RFI letter on the anticipated population growth/increase in households from the current situation and projecting forward to 2031 for Springfield are outlined on pages 105 & 106.
- 3.2 The essence of this plan change request is not to cater and provide for population growth per se', but rather is to provide for increased housing choice for those people wishing to reside in the immediate Springfield area. At present the housing choice in this locality is limited to those existing properties say in the range of +/- 1,000 m² (being the standard ¼ acre) within the township itself, 20 ha in the surrounding Outer Plains as a permitted activity, or any existing smaller rural property with an existing dwelling in the context of existing use rights, or the need to apply for a land use consent for any sub-sized vacant allotment.
- 3.3 The subject land is therefore seen as providing an alternative housing option for people seeking to reside in a rural residential setting in Springfield beyond what currently exists. Should this plan change request be successful and the resultant rural residential development eventuates, this obviously will result in a population increase of the Springfield township. But this in itself is not seen as being a driver for increasing the local population. The eventual outcome for the Springfield urban area may well be an increase in the 2031 local population beyond that predicted by the Council. Such a scenario can be expected to derive positive local benefits arising from this.
- 3.4 This concept of housing choice is a fundamental policy provision within the Selwyn District Plan. This is highlighted in the Township Volume of the District Plan where in the objectives and policies section (4 – *Growth of Townships*) where the following issue B4.1 (*Residential Density*) is identified:
- 'The need for a range of section sizes and living environments in Selwyn District, while maintaining the spacious character and amenity values of townships'.*
- 3.5 This issue highlights the desirability for the District Plan to make adequate provision for a range of housing options within the various township within the Selwyn District. In this context the following rural

residential situations currently apply in the District Plan where the minimum average allotment size is required to be equal or greater than 1ha.

Township	Zoning	Average Minimum Allotment Area (as per Table C12.1: <i>Allotment Sizes</i>).
Coalgate	L2	1 ha.
Darfield	Living 2A (Deferred) Living 2A1	1 ha. (if criteria met). 2 ha.
Dunsandel	Living 2	1 ha.
Kirwee	Living 2 Living 2A	1 ha. 1 ha. & 2 ha.
Prebbleton	Living 2A (The Paddocks)	1.5 ha. (minimum allotment size).
Rolleston	Living 2A	1 ha.
West Melton	Living 2A	1 ha. (minimum. allotment size).

- 3.6 As is evident in the above table, it are the townships of Darfield and Kirwee that currently provide for a 2 ha allotment option. The Kirwee situation is akin to a buffer scenario applying to the urban / rural interface. In comparison the Darfield situation with its Living L2A1 zone is flanked by various other Living Zones and the Outer Plains Rural Zone beyond on its outer perimeter along Clintons Road.
- 3.7 The current proposal for Springfield is for the requested Living 2 Zone to extend beyond the existing Living 1 Zone (being the current urban area) and bounded by the Midland Railway Line, Annavale Road and an unnamed road.
- 3.8 The ability for the subject land to have a 2 ha average minimum allotment area as opposed to the higher density 1 ha average minimum allotment area is seen as having the following benefits:
- Springfield is one of the more isolated and distant townships in the Selwyn District. Coupled with this are the panoramic and open scenic views that extend from the west (of the Russell Range/Malvern Hills), through to the north (of the Torlesse Range) and then onto the north east (that includes Mt Oxford).
 - The openness of this landscape and the ability to obtain extensive mountain views as enjoyed by residents within the existing urban area, and those residents on nearby rural zoned properties; will best be maintained by limiting the density of further new dwellings that may be established in the surrounding rural areas, including that on the subject land.
 - By limiting the dwelling density to an average of 1 per 2 ha as opposed to 1 per 1 ha, this will better ensure the maintenance of the existing sense of openness of the surrounding rural area to the north east of the existing Springfield township.
- 3.9 While the subject land is included within the Area Plan as a '*Preferred Future Development Area*' for 'low-density residential' purposes, there is otherwise no other guidance given in respect of what is being contemplated by the Council on what an appropriate density may well be.
- 3.10 I am of the opinion that a 'precautionary approach' should be adopted in the first instance by selecting a somewhat low residential density (in this case being 2 ha per dwelling) and at a later date reassessing

that situation once a number of new dwellings have been established on the subject land. At such a time the visual and amenity values of the immediate area can be re-assessed in the context of the District Plan and Regional Policy Statement / Regional Plans that may be in effect at such a time. Should such an exercise determine that it would be appropriate for the dwelling density to be increased from what may have been originally been deemed appropriate (say from an average site area of 2 ha reduced down to say 1 ha per dwelling), then the required plan change process could be undertaken at that time.

- 3.11 As a consequence of such a process gaining approving, and it results in an increased dwelling density for the subject land; it will inevitably require some retrofitting of the infrastructure that may have been required to be installed as part of the original dwelling development. Notwithstanding this, such a retrofitting requirement it is seen as not presenting any significant issues. Such a prediction is based on the following factors:

Access: Existing Road Frontages

- i. The subject land has an extensive frontage length in respect of both Pocock Road and Annavale Road. For those properties that have direct frontage onto either, or both, of these roads; this will ensure that the provision of additional vehicular access points will be minimal. In respect of the need to have additional entranceways/vehicle crossings installed to service additional allotments, the ODP shows that a typical road frontage length for those indicative allotments ranging from 100 – 125 metres. With such extensive boundary frontages, it can be determined that the ability to install additional vehicle crossings in complying locations can easily be achieved. This is in the context of Table E13.7 – *Vehicle Crossing Requirements* (Township Volume) where the following vehicle crossing separation distances apply for Living zones:

- *Vehicle crossing to a shared accessway: Greater than 7m;*
- *All other vehicle crossings: Less than 1m or greater than 7m.*

Accordingly, the provision of new vehicle crossings for any new allotments having direct frontage onto either Pocock Road and/or Annavale Road can easily be installed so to comply with the above requirements.

Access: Proposed Two New Accessways

- ii. The ODP shows the provision of two new internal accessways to provide the necessary access for those new allotments that do not have direct frontage onto either Pocock Road or Annavale Road. The ODP also shows that there are 8 ‘indicative’ 2 ha allotments that fit into this category of not having any direct road frontage. The District Plan (Township Volume) in Table E13.4 (*Minimum Requirements for any Shared Private Vehicular Accessway*) provides for a maximum of 6 sites to access onto a private vehicle accessway. Therefore when providing two separate accessways, this provides for a maximum potential of 12 sites. With the ODP containing 8 ‘indicative’ allotments, there remains a further four potential allotments so not to exceed the permitted maximum of six sites per accessway. Furthermore, the adjacent Midland Railway Line with its 80 metre wide ‘no dwelling build area’ is a further limiting factor in increasing the dwelling density within the central portion of the overall subject property.

Water Supply

- iii. The provision of the water supply to the subject land as part of any rural residential development is to be by way of a restricted/low pressure scheme delivering 2,000 litres to each dwelling on a daily

basis. It is understood that the provision of a limited number of additional connections to such a water supply scheme (that would typify any further development on the subject land) is seen as posing no problems given the overall volume of water that the Springfield water supply scheme is able to supply on a daily basis. Being a restricted water supply will further support such a proposition.

Telecommunication and Electricity Services

- iv. Given the limited amount of additional sites that would be created on the subject property should the rural residential density be increased say from 1 per 2 ha to 1 per 1 ha, the expectation is that there should be no problems encountered for this limited number of additional telephone and electricity connections to be provided.

Wastewater Treatment and Disposal

- v. Currently with the entire Springfield urban area, and indeed also the entire surrounding rural areas, the treatment and disposal of wastewater is required to be undertaken on-site. This typically requires the need for a septic tank and an associated disposal field.
- vi. This pattern of dealing with on-site wastewater treatment and disposal on the subject property will be likewise the same, whatever the eventual dwelling density(ies) in the context of any rural residential development undertaken.

Stormwater Treatment and Disposal

- vii. The issues associated with the treatment and disposal of stormwater are essentially the same as those for wastewater; being the need to resolve them on-site.

4. NES Contamination

- 4.1 I have been advised by Mr Robert Logan, being the sole director and shareholder of Ballymena Holdings Ltd (the applicant company) that the subject land since 2013 has only been used for productive purposes. This is in terms of stock grazing on pasture and/or the growing of crops.
- 4.2 On this basis it is reasonable to conclude that the initial 2013 Preliminary Site Investigation report ('PSI') prepared by Tasman Environmental Management remains valid. This PSI concluded the following outcome:

'No HAIL activities that may cause significant soil contamination have been identified therefore this property represents a typical greenfield site and should be suitable for the intended rural residential land use.'

- 4.3 Accordingly it is concluded that this PSI can remain in this current form with no additions or alterations required as the continued land uses of grazing animals and the growing of crops will not increase any risk to human health due to any potential soil contamination that may arise.

5. Transport

- 5.1 In order to provide an update to the June 2013 traffic assessment report prepared by Novo Group to ascertain the extent to which the nature and extent of vehicle crashes may have changed since that time, the Selwyn District Council engineering/traffic department was contacted. Mr Grant Chesterman (Council's Corridor Manager) has verbally advised that there has been only a single vehicle crash in recent times that has occurred in this general locality. This was a nose-to-tail collision on Pocock Road that

occurred on 22 March 2014. Council records do not indicate the location along Pocock Road where this collision occurred.

- 5.2 Given this available crash-related information as provided by the Council applicable since June 2013, it can be concluded that the traffic accident rate is insignificant in this general locality within the Springfield urban area. Accordingly, it can be concluded that the traffic assessment undertaken by Novo Group at that time still remains valid and does not require an amendments.

6. Consultation

Owner of 55 Pocock Road Consultation

- 6.1 This is in respect of consultation undertaken to date with the adjoining owner of Lot 1 DP 400509 (55 Pocock Road) being Mr Russell Neal Peoples.
- 6.2 I have been advised by Mr Robert Logan that he has maintained regular verbal contact with Mr Peoples since first mooted the plan change proposal with him back in 2012/13. During the time since then whenever they meet, Mr Peoples has always expressed his support to Mr Logan for this plan change request and has never indicated any concerns or queries regarding it.
- 6.3 So while there has been no written/formal confirmation of Mr Logan's consultation with Mr Peoples, there has been at least an ongoing consultation at the 'verbal/personal level'.
- 6.4 Had there ever been any issues raised by Mr Peoples over this plan change proposal, then his property in the first instance would have never been included as part of the subject land. It is therefore with his continued verbal support that his land continues to comprise part of the overall subject land.

Mana Whenua Consultation

- 6.5 As an advice note, you make reference that it is encouraged for the applicant to undertake consultation with mana whenua. However in the context of this plan change request it has been deemed that such consultation is not required. This assessment has been made in consideration of the following matters that are deemed as being of importance:

- a. The plan change request is seen as being in accord with the applicable provisions within the Ngai Tahu '*Mahaanui Iwi Management Plan*.' This assessment is outlined in the plan change documentation submitted originally with the Selwyn District.
- b. In the context of the Malvern Area Plan, and in particular the Springfield-related provisions in respect of '5 Waters'; the following is noted:

'Mana whenua support the development of Low Impact Urban Design and Development.'

- c. Given that the undertaking of any rural-residential development as proposed on the subject land will have a low dwelling density, the corollary is that it will likewise be of a 'low impact urban design' in this rural setting. Accordingly, what mana whenua have expressed as supporting will be provided as part of this rural residential development.
- d. There are no nearby sites or areas in the vicinity of the subject land, and those beyond, that are identified in the District Plan as having any cultural significance. This is in the context of both archaeological sites and areas subject to silent files. The nearest listed archaeological site is 'C25' being to the south of the Springfield township on the property legally described as Pt RS 6471. This particular site of cultural importance is described in the District Plan as being an 'oven'.

- 6.6 Therefore when taking the above cultural matters collectively into account, it is considered appropriate for all parties involved that consultation with mana whenua in this case is not required, and nor can such a process be justified.

7. Proposed Rule Package

- 7.1 I wish to advise as follows in respect of the matters raised:

Paragraph 5.1.33

- 7.2 This paragraph, and including the prior paragraph 5.1.32, pertains to maintaining visibility for motorists (and presumably also train drivers) when approaching a railway crossing in the context of the subject property. When this application documentation was initially prepared the ODP did show the establishing of landscape plantings on the subject property alongside the boundary shared with the railway corridor. However since then this strip of landscape plantings has since been deleted from the ODP due to concerns raised by KiwiRail in terms of on-going maintenance for pruning, continued safety etc. As the proposal is now for any dwelling to be established a minimum of 80 metres from the near boundary of the railway corridor, the need to provide mitigation landscape plantings along this joint boundary is seen as being no longer required.
- 7.3 Given this current situation, paragraphs 5.1.33 and 5.1.34 should be deleted from this document. The default fall-back stance to be taken on the matter of railway crossing safety by motorists/cyclists is to rely upon the standard District Plan provisions that currently exist as referred to in paragraph 5.1.32.

Land Use/Dwelling Controls

- 7.4 In governing the siting and the extent of any future dwellings on the subject land, it is considered that this matter is already covered by the existing District Plan provisions. This is particularly in respect of the existing Rule 4.6.1 (*Permitted Activities — Buildings and Building Density. Township Volume*) which essentially provides for only a single dwelling (and a single family flat) as a permitted activity. Any non-compliance with this requirement is to be assessed as a non-complying activity as per the existing Rule 4.6.6.
- 7.5 The creation of new allotments upon which future dwellings are to be established is proposed to be governed by the following new subdivision requirement.

Additional Subdivision Rule Amendment

- 7.6 To ensure that any future subdivision of the subject land proceeds as intended, the additional amendment to the existing subdivision rules will be required:

Insert the following as the new Rule 12.1.3.53 to read as follows:

Springfield

12.1.53 In relation to the Living 2 Zone at Springfield, any subdivision shall generally be in accord with the Outline Development Plan at Appendix 49.

The existing Rule 12.1.53 (Springston) and beyond shall be re-numbered accordingly.

Amended Access Provision

- 7.7 In order to comply with the District Plan requirement of any private accessway serving a maximum of 6 sites/dwelling, the ODP has been amended so to include two accessways. The current proposal contains only the single accessway. As noted in paragraph 3.11.ii, the provision of two independent

accessways will allow for future dwelling infilling should there be a future requirement or demand for a higher dwelling density to be achieved.

8. Fire Fighting Capability

- 8.1 The Selwyn District Council document “*Water Supplies – Activity Management Plan*” Vol 2, 2015 notes the following in respect of the Springfield Water Supply Scheme and its firefighting capacity:

‘The scheme was originally designed in 1985 as an unrestricted supply with full ‘Fire Fighting capacity.’
(page 466 of 589)

- 8.2 I understand from Council staff that this situation can still be expected to apply to the present time. The attached services plans provided by the Selwyn District Council shows the existing water reticulation in the Annavale Road, Pocock Road and Tramway Road vicinity. These plans show that the nearest fire hydrant is located in Tramway Road directly opposite Albert Street. This is some 150 metres from the intersection with Pocock Road.

- 8.3 Given this situation I am of the opinion that the eventual firefighting provisions to be installed can best be determined at the time of either land use and/or subdivision consent. This is on the basis that at those times the form, scale and location of the eventually dwellings will have been determined. Such a level of site development detail is not available at this time as part of the plan change request and therefore the appropriateness of deferring the making of technical decisions until later when development plans are more advanced.

- 8.4 Notwithstanding this situation, and in the context of SNZ PAS 4509:2008: *New Zealand Fire Service Firefighting Water Supplies Code of Practice*, the following firefighting capabilities could be utilised in the context of the subject land being developed for rural residential purposes:

- a. Extend the existing Springfield fire hydrant reticulation beyond that which currently exists in Tramway Road; subject to Council approval and as per *SNZ PAS 4509:2008 (Appendix L: Specification, Location and Marking of Fire Hydrants)*; and/or
- b. The provision of a static supply of on-site water storage (*as per SNZ PAS 4509:2008 Appendix B: Alternate Firefighting Water Sources*); and/or
- c. The installation of a domestic water sprinkler system for any new dwelling/principal building (*as per SNZ PAS 4509:2008 Appendix C: Sprinkler Demand*).

- 8.5 Given the above options, it further reinforces the belief that the provision of firefighting capabilities for future dwellings being established on the subject land is best dealt with as part of the future subdivision and/or land use / building consent processes. Also at that time Fire and Emergency NZ can be approached so the input of their technical-based information can be utilised to better inform the range of options that may be available.

9 Selwyn District Council Rural Residential Strategy (June 2014)

- 9.1 Your comments on the Selwyn District Council Rural Residential Strategy (June 2014) (‘RRS14’) are noted. As acknowledged, this strategy document applies essentially to the townships in the east of the District that corresponds with the Greater Christchurch Urban Area in the context of the Regional Policy Statement.
- 9.2 Notwithstanding that Springfield is not located within this RPS sub-area, the principles and design recommendations within the RRS14 are seen as being applicable to the current plan change request given the contemplated dwelling density, site area etc.

10 Conclusion

- 10.1 Please note that should the Council have any queries regarding any of the matters contained within the attached documentation, the applicant company and myself would gladly meet with any Council staff concerned.

Yours truly,

PLANNING SOLUTIONS LTD

A handwritten signature in black ink, appearing to read 'John Cook', is written over a faint, rectangular stamp or watermark.

John Cook

BPlan MNZPI NZCD(Arch).