

From: submissions@selwyn.govt.nz
To: [Submissions](#)
Subject: Form 5 Submission
Date: Sunday, 14 April 2019 3:29:00 p.m.

**** Your Details ****

Proposed Plan Change No: : PC59
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**** Submission ****

My/Our Submissions is: : Refer attached - submission will not attach. have sent to 'submissions...' email address
I/We seek the following decision from the Council for the following reasons : We do not support the Proposed Plan Change
If you are attaching your submission separately, do so here : No file uploaded
Supporting Information : No file uploaded

**** Hearing Options ****

Do you wish to be heard in support of your submission : Yes
If others are making a similar submission would you consider presenting a joint case with them at the Hearing :
Yes

**** Trade Competition ****

I could gain a competitive advantage in trade competition through this submission : No (please skip to Hearing Options)
If yes, I am directly affected by an effect of the subject matter of the submission that (a)Adversely affects the environment; and (b)Does not relate to trade competition or the effects of trade competition :

Narelle Souness and Kerry Ring

c/o 44 Silver Peaks Drive

Wilfield

West Melton

04 April 2019

This submission is made in respect of the Wilfield Plan Change proposed by GW Wilfield Ltd.

For the following reasons, we strongly oppose the Proposed Plan Change (PPC) as proposed by the Applicant.

- We do not feel that the provisions offered in the application satisfy the Section 32 of the RMA. We do not consider that all ‘other reasonably practicable options’ have been considered to sell the larger lots in advance of applying for the PPC. If a retail shop cannot sell merchandise, they drop the price. They do not apply to the Government for a decrease in tax. The Developer made a business decision to subdivide as per the status quo and under the current District Plan rules. Current owners purchased their sections under these same conditions and in good faith. Why should current owners within Wilfield be punished for what is essentially the Developers lack of foresight in assessing the market. Further, we do not feel that what is proposed is either ‘efficient’ or will necessarily be effective considering the extensive infrastructure upgrades that will be required should the PPC go ahead.
- We do not consider that the PPC is ‘limited in extend and density to minimise effects on safety and efficiency of the highway’. Any increase in density effects safety and efficiency regardless of the size of that increase. A major concern is the safety of children resident in Wilfield to safely cross SH73 to access West Melton Primary School and the numerous busses that transport secondary students into town. Not only is there no designated carriageway from the sole formal pedestrian link across SH73 back toward the area secondary students wait for their bus outside Hope Church, but there is also no specific bus stop. At best the current arrangement is an accident waiting to happen and it concerns me that we might have to wait for a fatality to affect change.
- We support Policy B4.3.101 as it currently reads in recognising the character of West Melton as a village with larger section sizes than other Selwyn townships. Had we wished to live in a higher density area, we would have brought in Rolleston.
- The intention to amend Part C Living Zone rules as proposed in Table C4.1 of the application is strongly opposed. Lots 1200-1800m² for example will be required to construct a 300-450m² dwelling, while those houses on larger sections (>1800m²): a 360-500m² dwelling. The disproportionality is unclear and will further intensify the movement away from a lower density environment. Such ‘feelings’ of low density are further constricted by the intention to

remove Rules 4.9.21.1.A and 4.9.21.2.A from the District Plan which provide for nominated setbacks adjacent to internal and road boundaries.

- We strongly oppose the Lot sizes proposed for Living WM South and Living WM South. The only indication of how the area will be divided under the PPC comes within the Infrastructure Report. While complete in the sense that it covers the ODP Boundary, there is no indication of how the boundary area will interface with the section of land south and south-west of the PPC area back toward Weedons Ross Road (refer Outline Development Plan, Overall Plan, Living WM South Zone Map, no page number). While the Map above and supporting Documentation note an additional 143 lots (Infrastructure Report, p. 8 against Transport Report which claims only 72 additional lots); there is no certainty that further Resource Consents will not be lodged (as have occurred in the current Wilfield arrangement). If we discount the PPC layout and consider the area purely in terms of m², the reality is that 225,738m² (Lot 707: 149,788m² and Lot 270-271: 75,950m²) remain undeveloped. Crudely speaking, devoid of roading allowances and the small low density corridor to the east, a maximum 205 lots at 1100m² could be added to the overall subdivision. This figure does not account for the subdivision of lots that remain unsold adjacent-South of SH73 which currently ALL sit at twice the area (m²) of the Proposed Plan Change minimum of 1100m². My point is not solely the increase in density, but the vagueness of the Developers plans and the potential for a decision to accept the PPC been made based on the evidence provided with the supporting documentations/Reports as ‘what will happen’ as opposed to ‘best case’. As noted elsewhere within this submission, numerous Resource Consents have been applied for already within the current Wilfield development which has changed the layout of the subdivision initially consented. The PPC is not an endpoint, there are instruments available to the Developers to supersede the rules outlined in the PPC if their goal posts shift again. Any such changes in scope, however minor, will void all information within the supporting documentation. All such consequences the community and Council will be left to accept.
- Visual Impact Assessment does not take into consideration the removal of Rules 4.9.21.1.A and 4.9.21.2.A. While it recommends ‘open style fencing’ to mitigate against adverse visual effects, it fails to consider the impact increase density coupled with reduced set-backs (from 6m at internal boundaries and 10m from road boundaries) will have on the visual aesthetic.
- Requirement to increase the capacity of the exiting reticulated sewer and water systems raises concerns with regards to future capacity issues. According to the Infrastructure Report (pp. 5, 8) there are 447 expansion sewer sites available before the 1276 lot capacity is reached. It is unclear, but assumed, that this is for the whole of the West Melton area. I do question how a Plan Change can be considered without full insight into the totality of the Developers intentions vs. the right of other land owners in the effected vicinity, whatever that area is, to develop/subdivide their land (Township Volume: Chapter B1 Natural Resources).
- With regard to water supply: ‘only at subdivision consent stage will... [the] extent of the upgrade works [be known]’ (Infrastructure Report, p. 7). I question how Council can agree to a Plan Change when the extent of the affect is unknown. Further, the Report noted the cost of the ‘reservoir and various upgrades’ to total \$2,650,000.00+GST. While the Report postulates that one third (\$847,762.63+GST) of the total cost would be covered by the PPC/Developer, who pays the remaining (\$1,802,236.64+GST) for the ‘immediate’ upgrade required in the short term (before the remaining 304 ‘available lots’ are developed).
- Object to the Applicants commented provided with regards to the PCC satisfying the District Plan Provisions:

- Objective B4.1.2 – how can reducing something, in this instance increasing density, ‘add to character and amenity values’?
- Policy B4.1.10 – reducing boundary setbacks does not support ‘spacious[ness]’.
- Objectives B4.3.1; B1.2.2; Policy B1.2.1 and B1.2.2 – the PPC has consequence for expanding the township in the sense of growing population and residential dwellings. The Infrastructure Report clearly states that the PPC would result in upgrading current service provisions, thus will ‘adversely affect both the natural and physical resources’ not only in making provision for, but also drawing from already ‘unreliable bores’ (Infrastructure Report, p.8).
- Policy B4.3.98 – the PPC only offers a small corridor of low density lots. The majority will be, at best, medium density. The increase in traffic will therefore jeopardise the safety and efficiency of the highway. As outlined above, I do not believe that the allocation of an additional 72 dwellings, as noted within the Transport Report, reflects an accurate picture of the reality the PPC will present.
- Objectives B2.1.1 and B2.1.4; Policy: B2.1.3; B2.1.4(a); B2.1.12; B2.1.13; B2.1.15 – increase in traffic volume, whatever the nature, goes against the intent of these above mentions Objectives and Policies.
- Objective B2.2.3 – the Infrastructure Report (p. 7) notes: ‘full modelling of the water supply at subdivision consent stage will confirm the extent of upgrade works’. If confirmation of the upgrades required are unknown, how can the Objective be measured?
- Policy B3.4.3 – the PPC does not support the intention of this Policy, specifically:
 - ‘safe and easy access for residents to associated services and facilities’;
 - ‘a subdivision layout that minimises the number of rear lots’. All proposed Resource Consents lodged to date within Wilfield have featured rear sections. The long and narrow layout of the sections proposed within the PPC area make rear lots inevitable should the land be further divided under a subsequent Resource Consent.

The applicant, within their Assessment of the Benefits and Cost of the PPC, notes: ‘opportunities for economic growth and employment are considered to be generally neutral’. What therefore is the benefit to Council or Community in adopting the PPC? My personal preference from the four options provided is Option 4. It provides the Council ability to control subdivision consent proposals in a way that align with their overall strategic vision for the whole area/township. It also provides the community/affected parties to have their opinion considered in matters directly affecting them.

Furthermore, as the PPC area ‘is already developed or consented to a density in excess of what the District Plan permits’ (Novogroup Report, p. 24), should the Council not maintain control of what it will inevitably end up having to manage and maintain? At very least, if change is to be considered it should occur during a review of the District Plan and not driven by a group of Developers.

As a Council, you are obliged to provide a duty of care. The District Plan, Resource Management Act and other governing legislation are the instruments you have either adopted or are obliged to use to administer that care. In some instances, it is permissible to provide discretion. In this instance, where

we believe few steps have been taken by the Applicant to sell the unsold Lots,¹ we would question your obligation to compromise in the first instance. Least alter previously tested rules. The PPC is not for the betterment of the subdivision, or West Melton community at large, and is therefore strongly opposed.

Faithfully,

Narelle Gray and Kerry Ring

44 and 65 Silver Peaks Drive

¹ We have not witnessed an extensive campaign to market the remaining sections as we have seen with other subdivisions failing to sell Lots: Highstead radio advertising. Nor do we believe there has been a reduction in sale price to entice buyers.