

19 September 2019

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c/- Baseline Group CLS Ltd
PO Box 8177
Riccarton
CHRISTCHURCH 8440

Attention: Adrienne Tisch

Sent by email to: adrienne@blg.nz

Dear Adrienne,

PC190062: Private Plan Change Leeston – Request for further information

Your application for the above plan change has been assessed for completeness under the First Schedule of the Resource Management Act 1991. A review has been undertaken of the application, with the following further information request being issued, to enable Council to better evaluate the nature and effects of the request (Clause 23(1)):

National Policy Statement on Urban Development Capacity

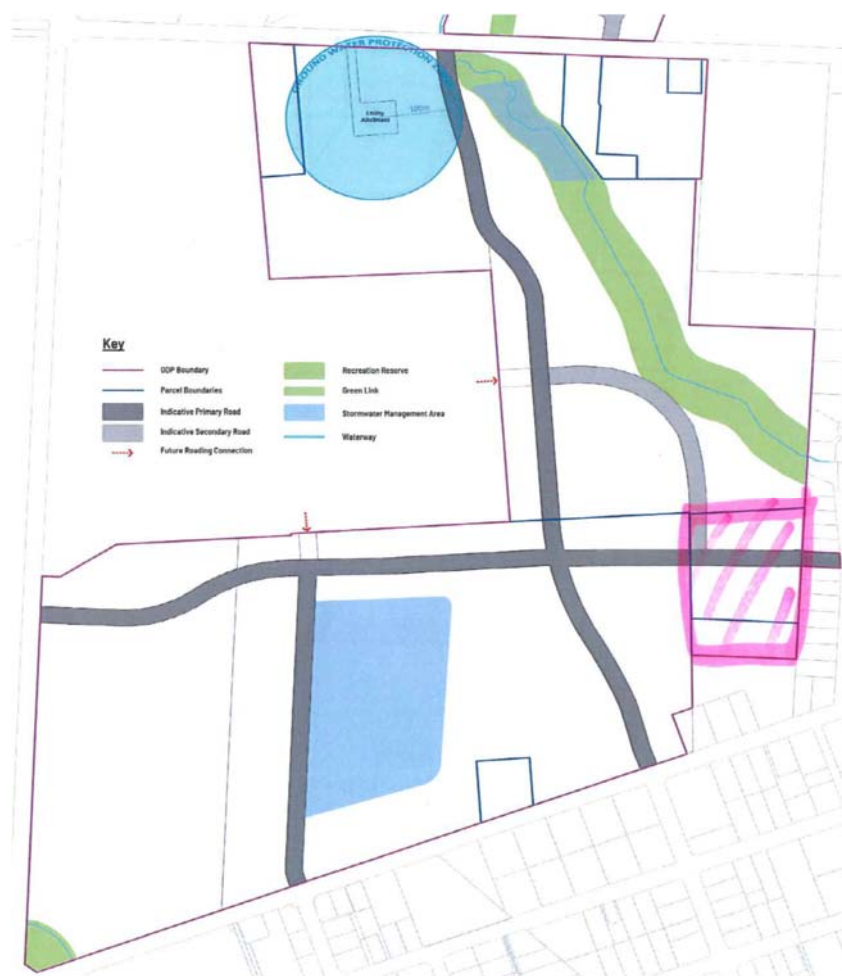
Please provide an assessment of the proposed plan change against the NPS-UDC, and in particular Policy PA3.

Stormwater

While the identified stormwater detention areas, enhancement of Leeston Creek and provision for Council's proposed Leeston North Stormwater Bypass are supported, the uplifting of the existing deferrals and rezoning of the application site relies heavily on the proposed bypass to address the known stormwater (and flooding) issues across the site. The plan change documentation suggests that a rule be included in the plan to require the vesting of the necessary land on Lot 2 DP 365379 at the time of the first subdivision. However, concerns exist regarding the timing of the construction of the proposed bypass in relation to the development of the site.

Therefore, please provide details of how the site will be protected from stormwater issues should the bypass not be constructed.

Please also advise how stormwater in the area shaded in pink below is to be managed in terms of water quality and quantity.



Flooding

Presently part of the site is deferred for residential development as it is subject to surface flooding, and the information provided from Environment Canterbury in Appendix 6 indicated that the wider site is also subject to surface water runoff and ponding during local rainfall events.

Please confirm that the 2015 LiDAR data provided in Appendix 6 is the latest data available, and that the balance of the advice from Environment Canterbury in 2017 is still current.

Please provide an assessment of the proposal again CRPS Policy 11.3.2 *Avoid development in an area subject to inundation.*

As discussed above in relation to stormwater, concerns exist that the proposed bypass may not be constructed (in full or in part) by the time of development of the site, or that the bypass may be sufficient to ameliorate any flooding issues at the densities proposed. Please identify what measures may be necessary to protect the proposed residential development from flooding should the bypass not be constructed (in full or in part) or be of insufficient capacity to fully ameliorate the effects of potential flooding. Such measures may include the stipulation of minimum finished floor levels or established of building platforms.

If the applicant should wish to proceed with development of the site in advance of the full construction of the bypass, a flood assessment would need to be carried out by a suitability qualified engineer.

Wastewater

The servicing report notes that the proposed plan change area will have the potential to accommodate approximately 380 new lots, however the plan change seeks a total of 410 lots (380 Living 1 and 30 Living 2). Do the additional 30 lots impact on the advice provided in the servicing report?

While the servicing report correctly identifies that upgrades are likely to be required to the trunk sewer downstream of the plan change area and the existing wastewater treatment plant, Council's Asset Manager has raised concerns regarding the ability of the wastewater treatment system to dispose of treated waste at the densities proposed.

It is advised that options to address the stormwater, flooding and waste water issues raised above are discussed with Council's Asset Manager – Water Services.

Roading

The Transportation Assessment does not provide a level of service assessment of the Market Street/High Street intersection resulting from the likely increase in traffic from the west (and likely north from Leeston Dunsandel Road) as a result of the proposed plan change. There are presently concerns within the community regarding the existing level of traffic using this intersection. Therefore, given that the Transportation Assessment indicates that there will be a significant increase traffic volumes east along High Street, the assessment needs to be extended to cover the Market Street/High Street intersection and any issues identified need to be addressed, to allay or mitigate these issues.

A key transport connection relies on access to Spring Place. It is noted that not all land owners affected by the proposed plan change are party to the plan change, particularly the owners of Lot 3 DP 50527, being that portion of the site fronting Spring Place. Given that this is shown as an indicative primary road, what contingency is in place if this connection cannot be secured?

While a future roading connection is shown from the northern part of the site to the east, into the adjoining land known as the 'Martin Block', the approved plan of subdivision for the 'Martin Block' does not appear to allow for this. Similarly, the indicative plan of subdivision included in the Transportation Assessment also does not appear to provide for this. As such, access to the northern block would likely operate as a cul de sac, the overall length of which is inconsistent with the provisions of the operative district plan. Please provide an alternative road layout for the northern portion of the site that would increase the resilience of the network, should one access be blocked for any reason.

As highlighted in yellow below, the ODP should show a specific pedestrian/cycle link along the main reserve/water course alignment. The ODP should also show a pedestrian/cycle link from the northern part of the to the future stormwater reserve area along the northern boundary of the site.



Please note that Council's Asset Manager- Transportation has advised that, in addition to the improvements suggested to Spring Place and High Street, the following frontage and other roading upgrades are likely to be required at the time of subdivision consent:

- The installation of a roundabout at the intersection of the southern primary road, High Street and Clausen Avenue. Corner splays on the Clausen Avenue end already exist to enable this. A roundabout is seen as a better solution at this key cross roads, rather than a priority intersection, as it provides a southern urban threshold to the township and the expanded urban area fronting on High Street, with the additional lots and intersections. This would better manage vehicles speeds along the development frontage.
- High Street is likely to require existing road/street frontage upgrades, including widening, kerbing, lighting and footpaths at least west to Clausen Avenue.
- As there is no connecting footpath from the plan change area east to the town centre on the north side, it will be a requirement that approximately 275m of footpath is provided by the developer, to cater for pedestrians and to encourage this sustainable transport mode.
- Similar upgrades and connections to existing footpaths will also be required on Leeston Dunsandel Road.
- A perimeter footpath along Harmans Road and the remainder of High Street adjoining the rural residential is also likely to be required.

Reserves

Formation of a reserve around Leeston Creek is desirable, however the width of this, along the whole length of the water body, appears to be excessive at 50-65 metres approximately. Advice from Council's Manager – Open Space and Property is that the reserve area around the creek should

be narrower (20-30 m) but have a wider area in a central location that could provide for a play space. If the width is required for flood attenuation, it will not be accepted as recreation reserve and should be identified as Local Purpose (Drainage) Reserve.

The plan change documentation also makes reference to the reserve providing amenity, a buffer and walking links but there is no specific rationale or assessment as to why it is so wide or what it will provide for. Generally, the provision of green space is not covered well within the plan change documentation. Accordingly, please clarify the purpose of the proposed width of any reserve around Leeston Creek.

Please note that Council's Manager – Open Space and Property has advised that, based on a yield of 410 households, there will be an ultimate population of around 1,100 generated from the development. The Council's standard for reserve provision is 1.2 ha per 1,000 population for neighbourhood reserves so this would equate to a requirement of around 1.32 hectares of reserve to be provided to meet the needs of the growth population. The areas shown as recreation reserve in the ODP provide approximately 2.9 ha, which is in excess of the requirement. It is also noted that, currently, there is not an overall deficit in neighbourhood open space in Leeston (around 1.5 ha/1000 pop.).

As such, the Manager – Open Space and Property has advised that the extent of recreation reserve that is currently being signalled would not attain full reserve credit for reserve development contributions as it exceeds the provision requirements.

Outline Development Plan (ODP)

To address CPTED issues, the proposed reserve along the creek should have extensive road frontages, rather than being behind houses, as reflected in the indicative subdivision plan included in the Transportation Assessment.

There are small inconsistencies between the overall ODP and the transport network in terms of the pedestrian/cycle links. Please resolve these. It is noted that a continuous alignment is preferred.

A future roading connection is also desirable from the northern Living 2 residential portion of the site to the west and south, connecting into the balance Rural (Outer Plains) Zone, to future proof accessibility within this locality

The names of the surrounding roads should also be shown on the ODP.

Please annotate the ODP (or supporting text) to include any measures appropriate to address reverse sensitivity matters between the residential zone and the existing business zone in the south eastern corner of the site. Please also indicate how any interface issues between the two residential zones are to be addressed.

It is also noted that while the proposed ODP is, subject to the above, generally adequate for the purpose of a plan change, there appears to be a number of area of inconsistency with that of the subdivision plan discussed with Council staff in July 2019 and included in the Transportation Assessment.

The ODP should be amended to reflect any matters raised in the points above, particularly regarding roading and reserves.

Consultation with Rūnanga

It is noted that the plan change application has been provided to Mahaanui Kurataiao Limited for their comment. Please provide a copy of any feedback received.

Peer review of Geotechnical Investigation Report

The Geotechnical Investigation Report has been referred for peer review. Any matters arising from this review will be forwarded for your attention as soon as possible.

Process from here

Once we have received a response to the above requests, it may be necessary to ask for further clarification of the extent to which this response addresses the above requests.

Whist you may decline to provide the above information (Clause 23(6)), you need to be aware that the Council may reject the request on this basis.

Once the Council is satisfied that it has adequate information, a report will be finalised to consider and make a recommendation on how to deal with your request.

Please contact me on (03) 347 1809 or jocelyn.lewes@selwyn.govt.nz if you have any questions.

Yours faithfully
SELWYN DISTRICT COUNCIL

A handwritten signature in black ink, appearing to read 'J Lewes'.

Jocelyn Lewes
Strategy and Policy Planner