

29 January 2020

Merf Ag Services Ltd & Matthew Reed

C/- Aston Consultants Ltd

PO Box 1435

Christchurch 8140

Attention: Fiona Aston

Dear Fiona,

PC190063: MERF AG SERVICES LTD & MATTHEW REED PRIVATE PLAN CHANGE: 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 accordingly.

Further Information

Clarification of the following points is requested to enable Council to better evaluate the nature and effects of the request (Clause 23(1)):

1) Character and Amenity Values

i) Zone interface

While the proposed L1/ L1 deferred zone for the site is consistent with the development to the south, it is at a significantly higher density than the land zoned L2 deferred to the west.

This potentially creates an adverse amenity effect at the interface between the establish land use and the proposed land use. Currently the residents of the L2 deferred area have an expectation of wider open areas and larger allotment sizes surrounding their properties, than would be found if they were L1 zoned.

Given this, please:

- a) Make an assessment of the actual or potential effects on the landowners of property within this area; and
- b) Provide details of any mitigation measures.

ii) Effect on the neighbourhood/ community

The application received does not include an urban design or landscape assessment report. This report should assess the effect on the immediate neighbourhood and the wider community from the

proposed change of open spaced rurally zoned land to higher density living zoned land. More specifically this report should include an:

- a) Contextual analysis of the changing urban boundary, the effect on the visual amenity of the wider community;
- b) Assessment on the key destinations and their connectivity with their rest of the site and Darfield as a whole; and
- c) Provide details of any mitigation measures.

iii) Mitigation measures

While you correctly assess that there will be an effect from changing the landscape from a rural outlook to an urban form, the report does not mention any mitigation measures proposed by the applicant in order to address this affect. Please provide details of any mitigation measures proposed to address this affect.

2) Outline Development Plan

The ODP states that the undeveloped land block on the southern extent of the proposed site is already zoned 'Living X'. However, this is not the case in the operative District Plan. Therefore please:

- a) Amend your Outline Development Plan to show this;
- b) Clarify if this block will also be required to use the community wastewater scheme proposed, and if this hasn't been included to date, then provide details of any amendments to the application to allow for this extra loading.

3) Transport

No integrated transport assessment (ITA) has been included with the application. Please provide an ITA that includes details regarding:

- a) Traffic volume generation for both the retirement village and the development as a whole;
- b) Connectivity and context to the adjoining networks;
- c) Intersection and infrastructure upgrades that would be required;
- d) How the internal walking and cycling network would operate;
- e) Rooding status of the roads within the retirement village;
- f) Indicative cross sections for each of the proposed rooding types;
- g) Consideration of the future road connectivity to the North and East;
- h) Size and design of the three non-vehicle links to the surrounding land;
- i) Effect on the safe operation of the level crossings in the area.

Regarding the effect on the safe operation of the level crossings in the area, some work has been carried out on this, with more still underway. Please review the attached report for further details.

In addition to the above, details on the following are also required to be provided:

- j) What road frontage upgrades (roads, footpaths, lighting, landscaping, stormwater, etc) that will be required along Kimberly Road, and who will meet the cost of these;

- k) What development needs to occur on Lot 7 DP 28741 (proposed pedestrian link on the south western extent), who will meet this cost, and how this development will affect the two properties that use this land for road access.

4) Freshwater Assets

While the proposed development is seen to be largely fine in regard to water reticulation from the SDC system, this effect is required to be modelled. In order to gauge and assess this effect you will need to contact Sue Harrison (sue.harrison@wsp.com) from Opus, who holds the water supply model for Darfield.

5) Wastewater Assets

Please either clarify or provide additional information on the following points:

- a) The location of the wastewater treatment system and disposal field, and the ability for this to constrain the future growth of Darfield;
- b) The application contains inconsistencies surrounding if the L1 deferred area would potentially be linked with the community wastewater scheme (proposed Rule 12.1.6.16B v Point 4.4 of the report). Please:
 - a. Clarify this aspect;
 - b. And if the L1 deferred area will also be linked to the community wastewater scheme, if allowance has been made for this in both treatment capacity, and land discharge area.
- c) The report states that the community wastewater scheme is only a short to medium term option out to 20 years, and relies on the Council installing a township scheme for the long term. Currently there are no plans or funding for a township wide wastewater scheme for Darfield. Given this, what is plan in case no Council scheme exists at the end of the 20 year period?
- d) While options as to how the community wastewater scheme could be managed have been included in the application, the application does not state how it will be managed. Certainty as to the long term operation and viability of the scheme needs to be achieved. Council have stated that they are not prepared to take on the community wastewater scheme in any form. Given this, please provide details as to how the scheme will managed, in both operation and ongoing maintenance.

6) Stormwater

While on-site disposal of stormwater is suitable from a District Council perspective, no detail has been provided regarding the stormwater disposal from the roading system, other than that swales will be provided. Please provide further detail on:

- a) If the expectation that these will be vested with Council, and if so the ongoing cost to maintain them.

7) Retirement Village

Retirement village activities will be treated as a restricted discretionary activity within the plan amendments proposed. On review of the matters of discretion, there is no ability to assess the effects from parking, access, safety, efficiency, and effects of on street parking and the neighbours.

Please either:

- a) Amend your application to include this ability to assess these elements; or
- b) Provide an assessment as to why these should not be included within the relevant matters of discretion.

8) Cost/ Benefit Analysis

The cost benefit analysis as required by Section 32 of Act is incomplete. Please provide the following analysis assessments:

- a) Cost:
 - a. Social
 - b. Cultural
 - c. Environmental
 - d. Wider economic effect on the community
- b) Benefit:
 - a. Environmental
 - b. Cultural
 - c. Social

In addition to the above no assessment has been made regarding the economic loss of land for rural production to the plan change area, and the area used for wastewater disposal, loss of employment verses the economic growth and employment opportunities provided for by application. For example: *the loss of the productive land may remove 1 FTE employment opportunity, but the works required to create the subdivision, construction works, and ongoing employment opportunities provided by the retirement village means that the land will be used in a way that will provide much more economic benefit.*

Essentially a brief economic assessment is required comparing the loss of rural production and associated employment with the potential economic growth, and employment opportunities that could be derived from the applied for plan change. Ideally this will be quantified, and if not practicable please state why.

Other things you may wish to consider

Iwi Authority Consultation

Consultation between the applicant and the Iwi Authority, this being Te Rūnanga o Ngāi Tahu within the Selwyn District, is strongly recommended.

I note you have attempted to consult with the Iwi Authority by way of consultation with Mahaanui Kurataiao Ltd, but have yet to receive a response.

Once a response has been provided, please:

- a) Send this response to us; and

- b) Provide a summary of your response to the advice received.

Policy wording

You may wish to re-look at the proposed provisions to ensure that they can stand alone, as the approach in the proposed District Plan is not to include any explanations or reasons for rules. Therefore, if the interpretation of any of the proposed provisions relies on the proposed reasons or explanations provided, you may wish to amend these at this stage.

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.

Whilst 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 1821 or robert.love@selwyn.govt.nz if you have any questions.

Yours faithfully

SELWYN DISTRICT COUNCIL

Robert Love

Strategy and Policy Planner