

4 November 2020

Rolleston Industrial Developments Ltd
C/- Kim Seaton
Novo Group Ltd
PO Box 365
Christchurch 8140

Dear Kim,

Re: Plan Change 66 to the Operative Selwyn District Plan – Rolleston Industrial Developments Ltd

Thank you for your application lodged on behalf of Rolleston Industrial Developments Ltd requesting a change to the Operative Selwyn District Plan. In accordance with Clause 23 of Schedule 1 of the Resource Management Act 1991 (RMA), the following information is requested to better understand the potential effects of the proposal, the ways in which adverse effects may be mitigated and the nature of consultation undertaken.

References to Dairy Processing Management Area

1. As noted in the Section 32 evaluation, an earlier iteration of this plan change (Plan Change 65) sought to establish a Dairy Processing Management Area (DPMA) on the same site. There are some remaining references within the application documents to the DMPA, including in paragraph 2.8 of the Economic Report, the explanation to Figure 9 in the LVA Graphic Assessment, and the footnote within the LVA Graphic Assessment. To avoid any confusion, please update these reports to remove reference to the DPMA where it is no longer relevant.

Section 32 Assessment

2. As set out in paragraph 27 of the Section 32 evaluation, an assessment is required of the extent to which the “*objectives of the proposal*” are the most appropriate way to achieve the purposes of the RMA. An evaluation must then be made as to whether the provisions in the proposal are the most appropriate way to achieve the objectives, which includes both the existing Plan objectives as well as the purpose of the proposal. The purpose of the proposal is stated as being “*to provide for the establishment of a new Business 2A Zone extension in Rolleston.*” However, one of the reasonably practicable options to achieve this outcome identified is through applying for resource consents. As a resource consent cannot achieve a zone extension, it is not a reasonably practicable option for achieving the stated objective. As currently stated, reasonably practicable options for achieving the purpose of the proposal would include alternate locations for such an extension that would require assessment.
3. To resolve this issue, please consider if the purpose of the proposal should be altered so that it is more broadly about establishing new industrial development on the site (as referred to in paragraph 35). Please also consider if any updates are required to the subsequent assessment in paragraph 32 of the Section 32 evaluation so that the assessment is more broadly about the purpose of proposal (rather than the specific provisions of the proposal). For completeness it is noted that the reasonably practicable options identified are considered to accord with this broader purpose.
4. The assessment set out on pages 12 – 16 includes mitigation measures being stated as ‘benefits’. Mitigation measures that are intended to address potential adverse effects arising from the proposal

are not considered to be benefits arising from the proposal. Please remove mitigation measures intended to address potential adverse effects from the benefits column. These could instead be included/incorporated in the discussion of the related cost (i.e. to identify the potential cost but also note any mitigation measures that are intended to address that cost).

Noise Effects

5. The application proposes that future development will be subject to the existing Business 2A noise standards, which apply limits at any point within the boundary of a site within the rural zone. At paragraph 29 of the Section 32 evaluation, it is stated that those standards are considered to be appropriate to protect rural residents from unacceptable noise effects arising from activities on the Plan Change site. However, the change in zoning proposed will enable a range of activities to take place on the site, many of which can generate higher levels of noise and these may not be able to meet the noise standards. Therefore, in order to properly understand and assess the effects on rural residents arising from the rezoning, further information is required as to whether these noise limits are likely to be met. Please provide a (brief) assessment from an acoustic expert that outlines the likely range of noise levels for activities enabled by the rezoning, and whether these are able, or likely, to comply with the noise limits. This may include identification of any mitigation measures that are available to reduce noise levels in order to achieve compliance.

Landscape and visual effects

6. The assessment of development of the site under the proposed Business 2A zoning is based on the using the actual development within the current Business 2A Zone to the west/southwest for comparison purposes. However, it is not clear from the assessment what the proposed scale / bulk / height/ site coverage of potential built form could be under the Business 2A zone (as per chapter C16 B Zone Buildings) or if the assessment was undertaken on the building parameters as outlined in Rule 16.6.2 of Township Volume. A 'worst case scenario' assessment is considered necessary to enable the full effects of the proposed Plan Change to be understood. Please provide an assessment of the full range of effects of built form that would be permitted under the Business 2A zoning (as relevant to landscape and visual effects).

Significant Development Capacity

7. In relation to the discussion regarding Policy 8 of the NPS-UD, paragraph 62(i) discusses the % increase the proposed zone change will add to the Business 2A zoning in the District. It is noted that the Business 2A zone is only located in Rolleston, not the wider District, and that the Business 2A zoning is not fundamentally different to other Business 2 zones. It is considered more appropriate to either provide the percentage increase resulting from the plan change site's rezoning, relative to all Business 2 zoning across the District (i.e. Business 2, Business 2A and Business 2B zoning) or relative to the combined Business 2 and 2A zone in Rolleston. Please consider this and amend the assessment accordingly.

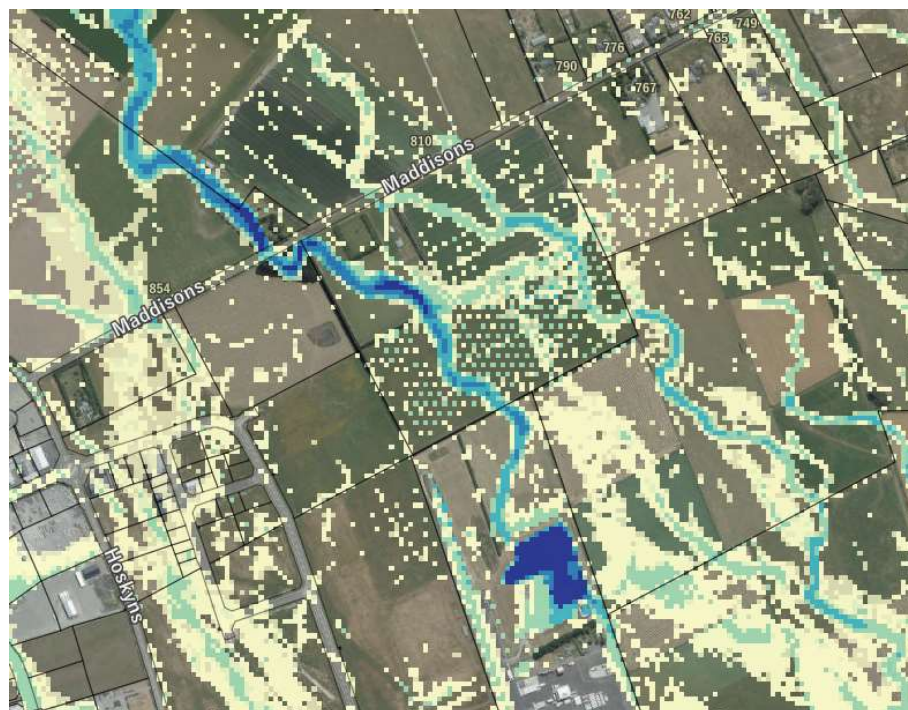
Provisions

8. Rule 16.1.2.1 sets out landscaping requirements for road frontages within the Business 2A Zone and would apply to the plan change site. As the proposed Outline Development Plan for the site includes specific landscaping requirements along the Maddisons Road frontage, please consider if any amendments are required to this rule, similar to the approach taken to other frontages within the Business 2A zone where more specific landscaping is specified in an outline development plan.

9. Proposed change #9 proposes to insert a new ODP into the District Plan, but refers to this as “Appendix E43A Rolleston Business 2A Zone East ODP”. Given Appendix 43 is similarly titled “Outline Development Plan-Business 2A Zone East, Rolleston” please consider an alternate title for proposed Appendix E43A that distinguishes between the two areas.

Infrastructure

10. The Infrastructure Report contained in Appendix A to the plan change application relies on assumptions and calculations that are contained in Attachment A to that report. Please provide the basis for these assumptions and calculations.
11. Please provide the peak water demand generated by this proposed development in l/s and the basis for calculating this.
12. Please confirm that the water supply network this development is connecting into has capacity to supply this peak demand
13. Please provide the peak discharge flow rate of wastewater generated from this site in l/s and the basis for calculating this.
14. Please confirm that the wastewater network this development is connecting into has capacity to receive this peak demand.
15. The proposed Selwyn District Plan identifies areas of the site as being within the Plains Flood Management Overlay, and in particular mapping indicates that there are overland flow paths running through the site (see screenshot below). This application proposes to introduce a minimum floor level for buildings within areas identified as being subject to a 200-year Average Recurrence Interval (ARI) flood hazard event, but does not more broadly discuss the effects of development facilitated by the plan change on the overland flow paths. Please provide a summary as to how it is proposed to manage the overland flow path.



Economic Impacts

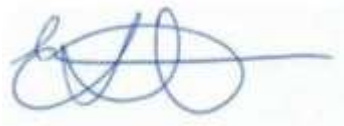
16. In broad terms, the economic assessment provided appears to be very similar to the assessment that accompanied the Plan Change 65 application, the earlier iteration of this plan change which sought to establish a DPMA on the same site. As a consequence, the assessment does not appear to have been sufficiently expanded in scope to adequately reflect the much broader change in potential land uses that the current application would enable. The following additional information is therefore required to address the wider scope of assessment that is considered necessary.
17. The economic report summarises the current importance of a range of economic sectors but does not consider how that has changed or may change in the future. Consideration of that future importance is considered relevant to understanding the appropriateness of providing an expansion to the industrial zone at this time. For example, non-agricultural activities such as industrial and retail are becoming more important in the District as the population grows, and an assessment of employment between 2000 and 2019 might show that agriculture is declining in importance, adding a broader perspective to the present day assessment provided in the economic assessment. Please provide an assessment that considers historic changes in the importance of different employment sectors relative to the size of the Selwyn District and Canterbury Region economies.
18. Please provide some quantitative estimates of effects on District and regional GDP to help place the economic effects of the proposed plan change in a broader economic context.
19. To understand the economic effects of the proposed plan change it is necessary to understand what net additional contribution to the economy (Selwyn and Canterbury) the proposal might make. This should take into account the existing output from the application site from agriculture. Please provide a quantification of the potential economic output from the proposed plan change site in terms of net additional employment and GDP.
20. The application states that the plan change will provide for anticipated demand, including by LPC Midland Port (p. 30). However, no evidence is presented of that demand, and there has been no assessment of the adequacy of current industrial land supply in the context of projected demand. That context would help to understand the need for the requested plan change at this time. Please provide an assessment of the demand for additional industrial activity on the site. This could either draw on the work in the "Our Space" document, which provides details on demand and supply of industrial land, or provide an independent assessment of industrial demand and supply.
21. Indications are that Selwyn is a high growth District, and is experiencing growth pressures. There is little in the economic assessment that addresses these pressures, which are relevant to understanding the current demand-supply balance of industrial land. Please update the economic assessment to include recent growth indicators, such as the most recent (September 2020) Estimated Resident Population data from Statistics NZ; building consent data for industrial developments; and the Greater Christchurch Partnership's industrial demand and supply study (OurSpace).

Please provide the requested information or provide written confirmation if you do not agree to provide the requested information. However, if the requested information is not provided, Council may reject the request or decide not to approve the plan change request, if it is considered that there is insufficient information to enable Council to consider or approve the request.

Once all requested information is provided, Council will consider its adequacy and within 15 working days of receiving the information and may require additional information relating to the request.

Please do not hesitate to contact me if you have any questions or concerns regarding the above request or further processing of the application.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Liz White', with a horizontal line extending to the right.

Liz White
Associate
Incite

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