

BEFORE THE HEARINGS COMMISSIONER  
FOR SELWYN DISTRICT COUNCIL

IN THE MATTER	Of Private Plan Change 68 to the Operative Selwyn District Plan by Urban Holdings Ltd, Suburban Estates Ltd, Crairnbrae Developments Ltd
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STATEMENT OF EVIDENCE OF MURRAY FLETCHER  
Dated: 20 March 2022

INTRODUCTION

1. I live at 9 Hida Place and have lived there with my wife Julie for almost 6 years. We purchased the section in 2015, built our home and moved into our new home in June 2016.
2. We choose to buy, build and live in Prebbleton due to its village nature and lifestyle. The section that we purchased has views to the north, east and south of a semi-rural nature, with numerous trees. The sections immediately to the west of us are 4-hectare lifestyle lots.
3. At the time the land to the south of Trents Road was and still is zoned Inner Plains (IP), our section Living (LZ) and to our west existing development area (EDA – Kingcraft Drive). At the time, development of the south side of Trents Road was not seen as necessary and was not part of the Selwyn District Council Planning process. We were rightly of the view that this land would not be developed, and our living quality would not be affected in the future by development.
4. The evidence that has been prepared for Plan Change 68 is numerous, both by the Applicant, Peer Reviewers, Council Planners, and Submitters. For a layperson who is suitably concerned to make a submission, it is an onerous and near impossible task to read all the evidence and make comment. My initial submission was around traffic, sustainability and how Plan Change 68 will provide for the overall development of Prebbleton. In this written submission, I outline additional comment and concern now that additional evidence has been provided.
5. While **I am opposed** to Plan change 68 for various reasons, if Plan Change 68 was approved, there are several changes that could be required, that will greatly enhance the development and while not complying with documents like ‘Our Space’ and ‘Climate Change Response (Zero Carbon) Amendment Act 2019’ may alleviant some of my concerns.

STRUCTURE OF MY EVIDENCE

6. I intend to make comment of various issues and concerns. On some issues, my concerns are supported by evidence from others which I will reference. In some cases, as I am a layperson and not a lawyer or planner, I cannot reference the relevant planning objective or reference to a particular piece of legislation, however I trust that you will view my comments and concerns with due respect, as I am sure you will.
  - Developers Motivation for Plan Change 68 / Economics
  - Compliance with ‘Our Space’ and Other Planning Documents

- Urban Design, Landscape and Visual Impact Assessment
- Transport and Sustainability
- Relief Sought

**DEVELOPERS MOTIVATION FOR PLAN CHANGE 68 / ECONOMICS**

7. Land values are increasing and there are substantial profits to me made. I have no concern with a business making a profit but it does concern me where a business seeks to change the rules for it to profit at the expense of others, in this case the immediate land owners on the north side of Trents Road including ourselves and the wider Prebbleton Community.
8. The evidence of Adam Thompson in his economic assessment, firstly in his report page 10, figure 5 and secondly page 18, figure 5 suggests significant financial gains if the land is re zoned. While I give a broad-brush interpretation, these figures suggest that by merely having the land rezoned from Inner Plains to Living, the land price increases from around \$20 per sq.m to \$100 plus per sq.m. Based on an area of 67.5ha. this is an increase in land value of \$54m plus.
9. If the land is then developed into 820 sections (which could in fact be 1,010 sections if the density is increased) at an average sale price of \$500,000 per section, then the sale value is between \$410m and \$505m. I have not used Mr. Thompsons figures in his figure 14, as these are clearly out of date indicating a sale price of \$315,000 for a 1,000sq.m section.
10. Of course, there is the cost of development, professional fees, infrastructure, contributions, tax etc. but I am sure that this will still leave a healthy profit. These costs are around \$100, 000 per section and the land following rezoning \$50,000 per section leaving a profit of around \$350,000 per section. This results in a profit of well over \$100m, maybe as much as \$250m for the entire development.
11. My point is, in my view, this is not about what is best for Prebbleton or Selwyn but a business opportunity to make a healthy profit. Various planning documents including 'Our Space' are based on extensive research and set out the future housing requirements and where these should be.

**COMPLIANCE WITH ‘OUR SPACE’ AND OTHER PLANNING DOCUMENTS**

- 12. ‘Our Space’ was developed by a Partnership of nine contributing organisations to identify preferred locations for housing growth, encouraging central city and suburban centre living while providing for township growth in other centres, especially Rolleston, Rangiora and Kaiapoi.
- 13. ‘Our Space considers numerous factors including population growth, housing demand, sustainably, public transport and more so where housing for this growth should take place.
- 14. What is the point of the time and cost developing such Planning Documents and Guidance if they are not followed and ignored?
- 15. This and other Policy issues are set in the Evidence of Marcus Langman on behalf of the Canterbury Regional Council and the Christchurch City Council. I support Mr. Langmans evidence and conclusions.

**URBAN DESIGN, LANDSCAPE AND VISUAL ASSESSMENT**

- 16. The Urban Design report by Dave Compton-Moen is unhelpful, as it does not show before and after visuals.
- 17. Trents Road is currently tree lined for most of its length from Oakley Drive to Shands Road, except for a section of fenced farmland on the south side of 150m long and the first 130m on the north side from Oakley Drive heading west which has houses fronting Trents Road.
- 18. The tree lined road provides a pleasant and calming outlook and contributes to carbon sinking.
- 19. For the residents on the north side of Trents Road, including our property and others, it also provides a pleasant outlook. As I mentioned earlier in my introduction, this was one of the draw cards of buying and building in Prebbleton.
- 20. Mr. Compton-Moen provided two viewpoint photos, VP4 and VP5. In table 2, page 16, he states the magnitude of change will be low. Has Mr. Compton-Moen based this on the fact that the tress will remain, or has he grossly underestimated the visual effect and loss of amenity value removing these trees will result in?
- 21. Mr. Compton-Moen also provides photo VP2, of Hamptons Road. I would agree that the visual effects will be low in this case, as the properties to the north will be developed and those looking to the south will be looking over farmland that is proposed to remain as it is. However, I can not agree that the magnitude of change for Trents Road is like Hamptons Road.

22. Below I include photos of Trents Road today and what it might look like following development if PC68 is approved.



Photo 1 – Trents Road today



Photo 2 – Farrington Development Fronting Selwyn Road Rolleston

23. Mr. Cleese in his section 42A report, clause 161, states that *‘A significant number of submitters have raised concerns regarding this change in outlook and landscape / village character. I agree that the outlook will change. A suburban outlook is not however negative – suburban areas within Selwyn’s townships generally display a high level of amenity, albeit a different amenity and landscape character relative to rural areas.’* Looking at the two comparison photos, does Mr. Cleese still agree with his statement?
24. Mr. Cleese also states in his section 42A report, clause 114, *‘Mr. Collins has likewise recommended that the ODP and narrative be amended to better provide for frontage road upgrades to urban standards and associated provision of an integrated footpath network, along with improved cycle routes through the site’.*
25. Why is the fallback position to urbanise, provide kerb and channel, footpaths etc.? Do we want to change photo 1 to photo 2? Firstly, this flies in the face of the Climate Change Response (Zero Carbon) Amendment Act 2019, secondly can we not be more creative.

**TRANSPORT AND SUSTANABILITY**

26. An Integrated Transportation Assessment has been prepared by Abley Consultants and reviewed by Flow Transportation Services. Both reports are substantial containing various tables, figures and diagrams summarizing their results.
27. The basis of any good report is its background data that has been used. With reference to the Abley report, the background information and traffic projections used, and the conclusions arrived at are flawed. With reference to P.11, Table 2.1. Traffic counts, the counts used are from 2017/18 and 19 therefore not current at time of writing the report. Traffic count for Springs Road is stated as 2,660 with 6% heavy traffic. Mobile Roads est. 30 June 2021 is 8,995 with 8% heavy at the same location used in the report. Shands Road 12,886 with 8.6% heavy v's Mobile Roads 14,679 with 9.8% heavy. A more appropriate comparison for PC68 to be used for the effects on Springs Road, is in the Village where the counts are more around 12,000 to 13,000 vpd. The traffic report assumes a growth rate of 2.8% per annum. This is flawed as it does not consider residential growth already approved and underway for Lincoln and Rolleston and the Plan changes to be considered for a further 5,700 new homes in 7 developments in Rolleston, which will put significantly more traffic onto Shands Road. Planned development in Lincoln will put more pressure on Springs Road.
28. Mr. Collins in his report Summary BP 1 top of P20, states *‘I consider that the ITA has demonstrated that the effects of PPC68 on the adjacent transport network are acceptable when considered in isolation of the other PPC’s’.* This is a weak conclusion, firstly it is based on flaws in the Abley report, secondly it is based on a first come first served basis, thirdly PC68 is not

included within the settlement areas, so other PC's being considered by the Selwyn District Council will not be factoring PC68 into any traffic calculations and traffic effects as a result.

29. Mr. Collins also states on the same page, *'While there are and will be capacity constraints on the Prebbleton transport network during peak periods, regional modelling indicates that Shand's Road and Springs Road are expected to experience little change in forecast growth, when comparing a 2038 scenario with 10,000 additional dwellings more than forecast'*. Living in Prebbleton and witnessing the growth even over the past five years, I find this hard to believe.
30. Mr. Cleese in his section 42A Report, clause 116, states *'In the event that a number of plan changes are approved, the QTP modelling suggests that the additional traffic demand will result in movement shifts to alternative less congested routes into Christchurch'*. Traffic models are not humane and need sensitivity checks. There are two main reasons why this statement is flawed, firstly there are few if any viable alternative routes for Rolleston and Lincoln into Christchurch, secondly the model does not know the condition of these alternative routes, for example width, pavement condition and geometry. The model simply works on distance and time. So, these alternative routes are often less safe and people tend to speed on them as they have a perceived idea that they need to make up time. These routes are called 'Rat Running' and are not liked by the residents on them or the local authorities.
31. Mr. Cleese also says in his section 42A Report, clause 115, *'Because decisions on the other plan changes in Rolleston and Lincoln have yet to be released, any increase in traffic generated by them is simply speculative at the time of writing. In short if they are all (or mostly) declined then there is limited cumulative effect.'* This is an odd statement; maybe he should also state what will be the effect if they are all approved? This statement highlights why there needs to be a plan in place like the 'Our Space' report to clearly set out where land should be developed so there is more certainty for future infrastructure planning.
32. In regard to Mr. Cleese's statement under section 114 of his 42A Report in regard to road frontage upgrades to urban standards, I have made comment under Urban Design, Landscape and Visual Assessment regarding this above.
33. I also note in Mr. Cleese's Transport Conclusions, he makes no reference of the **Climate Change Response (Zero Carbon) Amendment Act 2019 and Public Transport**.
34. The Plan Change is private motor vehicle based and does not adequately consider the use of walking, cycling and public transport, other than some cursory comments. There should be planning to show how the public transport system can be extended to accommodate the development and the effect that this will have on reducing vehicle numbers and carbon use. The only indication in the "Outline Development Plan" indicating walking and cycling are two arrows notated as walkway / cycleway from the existing Stirling Park development. There is no indication how 820 plus homes are going to be connected to promote walking and cycling including safe integration with Trents and Hamptons Roads, schooling and the Prebbleton Village. This development will increase the population of Prebbleton by around 40% and it is

being presented as a simple bolt on subdivision. Mr. Collings in table 4 notes *'In my view, the funding and implementation of a public transport system is a matter for Prebbleton as a whole, rather than a site-specific matter relating to the plan change.'* I thought it was a requirement under the planning rules to consider Public Transport and Climate change?

35. Hamptons Road is classified as an arterial road, as such protections should be in place to protect access to it and promote safety. These protections were not afforded to Selwyn Road bounding the Farrington subdivision, (refer 22, photo 2 above) this has compromised Selwyn Road as a ring road for Rolleston, resulted in speeds being lowered and increased safety risks for road users including pedestrians. I disagree with Mr. Collins comments in his Transport Report top of p17, where he says *'I am not concerned about direct access to Trents Road. As Hamptons Road is classified as an arterial road, direct vehicle access can be considered during future subdivisions consents, as there are District Plan rules to manage the effects of vehicle crossings onto arterial roads.'* In my view, the effects on Trents and Hamptons Road should be considered as part of the PC68 application.

**RELIEF SOURGT**

36. That the proposed Private Plan change 68 be declined.