

25 June 2021

Urban Holdings Ltd, Suburban Estates Ltd, and Cairnbrae Developments Ltd  
C/- Davie Lovell-Smith  
PO Box 679  
**CHRISTCHURCH 8140**  
Attention: Patricia Harte

**Sent by email to: [patricia.harte@dls.co.nz](mailto:patricia.harte@dls.co.nz)**

Dear Patricia

**PC68: Private Plan Change Request to the Operative Selwyn District Plan at West Prebbleton:  
Request for Further Information**

Thank you for your response to Council's Request for Further Information ('RFI'), dated 17<sup>th</sup> June. I have reviewed the information provided and consider that it generally addresses the matters set out in Council's RFI dated 28<sup>th</sup> April.

There remain several discrete matters where further clarification is sought.

**Density:**

The RFI states in a number of places that the anticipated density of the plan change area is a minimum of 12 households/ha. The economic report is likewise predicated upon this density being realised in order to deliver both the total number of households and a range in section sizes and price points. If the application is based on achieving 12hh/ha then this density needs to be clearly identified in the District Plan. The two most common mechanisms for specifying minimum densities are either through a text amendment to Table C12.1 and/or through a statement on the Outline Development Plan that the ODP will deliver 12hh/ha. Any subsequent subdivision consent plan that does not deliver the requisite density will not then be in accordance with the ODP and an assessment of the effects of under provision can be assessed. As it stands the proposed plan change does not include any mechanism in the District Plan to ensure the anticipated density is delivered.

As a matter of merit, I am cautious about an ODP (and economic benefits report) that are reliant on a future fully discretionary activity consent being granted in order to deliver the anticipated yield/benefits. As noted in the RFI response, the areas of medium density shown on the ODP are too small to deliver the anticipated yield and therefore achieving 12hh/ha is dependent on successfully being granted fully discretionary consents in locations that are not adjacent to areas of public open space. I also note that the economic report does not appear to take into account the strip of land fronting onto Shands Road where the ODP requires minimum lot sizes of 1,500m<sup>2</sup> (as the economic report is based on a maximum section size of 1,000m<sup>2</sup>), which places further pressure on the balance of the site to deliver the density outcomes anticipated.

Unlike the majority of ODPs in the District Plan, the proposed ODP does not contain any narrative description of the outcomes sought for the ODP (typically under headings relating to density, access, three-waters, and greenspace). Given the proposed density solution turns on successfully being granted discretionary resource consents in locations other than those shown on the ODP as being suitable for medium density, there would be merit in including a narrative description of the outcomes to be achieved by comprehensive medium density.

**Water race:**

As identified in matter 15 of the earlier RFI, a water race appears to be identified on the ODP as a blue dashed line that runs parallel to Trents Road. This blue dashed line is not however referenced in the ODP key which should be updated. As with the above density matter, there may be merit in including a brief narrative statement regarding the treatment of the water race.

**Transport:**

I have forwarded a copy of the memorandum from Abley Transportation and associated updated Integrated Transport Assessment to Andrew Mazey, Council's Transportation Asset Manager. I have yet to receive feedback from Mr Mazey and will pass this on to you in the event that additional comments are received. For now, I note that Mr Mazey's original feedback was in the form of comments rather than RFI questions, and that his overall conclusion was that there were no significant transport-related impediments to the plan change. As such I consider that transport-related matters for this RFI stage in the plan change process are resolved.

**Process from here**

Apart from the discrete matters identified above, I am satisfied that the RFI matters have been addressed. I anticipate that the remaining outstanding matters will be able to be addressed relatively easily by the applicant. In parallel with you preparing your response, I will draft a report to Council to enable Council to make a decision on how to deal with your request i.e. to proceed to the plan change being publicly notified. This will enable the report to proceed to Council in a timely manner as my report drafting and internal signoff can occur while you are preparing your final response.

Please do not hesitate to contact me on (03) 964-4630 or [jonathan@planzconsultants.co.nz](mailto:jonathan@planzconsultants.co.nz) if you have any questions.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Jonathan Cleese'.

Jonathan Cleese

**Consultant Planner**

On behalf of the **SELWYN DISTRICT COUNCIL**