

28 April 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

Dear Patricia

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

Thank you for your request lodged on behalf of Urban Holdings Ltd, Suburban Estates Ltd, and Cairnbrae Developments Ltd ('the applicants') to change the Operative Selwyn District Plan (zoning at Prebbleton plus consequential text amendments). In accordance with Clause 23 of Schedule 1 of the Resource Management Act 1991 (RMA), the following information is requested to enable Council to better evaluate the potential effects of the change, the ways in which adverse effects may be mitigated, and the nature of consultation undertaken.

Assessment against Policy B4.3.3 and confirmation of geographic boundaries

The plan change documentation does not assess the proposal against Policy B4.3.3. This policy seeks to 'avoid zoning patterns that leave land zoned Rural surrounded on three or more boundaries with land zoned Living or Business'. The proposed plan change boundary excludes two Rural Zoned blocks located between the application site and Trents Road. If the plan change request is accepted, these two blocks will be left with a Rural Zoning that is bounded on at least three sides by some form of Living Zone.

1. *Either provide an assessment as to how the plan change aligns with Policy B4.3.3 to avoid such an outcome, or amend the plan change boundary to include these two blocks.*
2. *Confirm whether or not servicing is dependent on these two blocks being included or not.*
3. *It is noted that the geographic extent of the land subject to the plan change application is not treated in a consistent manner across the various technical reports i.e. some already include these two blocks. The documentation should be consistent as to the geographic extent of the site.*

Clarification of expected yield and permitted minimum lot sizes

The ODP and the lot yield referred to in the Economic Assessment do not align with the Operative Plan rules controlling minimum lot sizes. These minimum lot sizes are set out in Township Volume rules 12.1.3.29-48 (for Prebbleton) and Table C12.1 and are specific to each township.

The Economic Assessment section 10 (pg18) states that the plan change will deliver 820 lots ranging in size from 400m² – 1,000m². This is then immediately contradicted by a statement that the plan

change will deliver 37 lots at 700-1000m² with the remaining 64.5ha developed with lots ranging in size from 200-700m². The ODP shows most of the site as low density Living Z Zone. Table C12.1 specifies an average 700m² and a minimum 550m² for low density Living Z. The ODP and zone rules therefore result in a fundamentally different outcome to that which the economic report is based upon which is the majority of lots being less than 500m². Medium density lots are permitted (subject to s224 requirements) in the Living Z zone, however the extent of such medium density areas on the ODP is quite limited. There seems to be a fundamental disconnect between the ODP, Operative Plan subdivision rules, and the lot size/ price point that the economic report is based upon.

4. *Provide an assessment of any text changes necessary to both the Prebbleton subdivision rules and table C12.1 to align the minimum subdivision lot size rules with the yield upon which PC68 and the economic and urban design assessments are based.*
5. *Provide an assessment of the rationale for any proposed minimums that differ from the general zone rules.*
6. *Alternatively if the generic zone lot sizes are to be maintained i.e. no changes are sought to Chapter 12, then update the economic and landscape assessments to reflect the yield permitted by the standard zone rules when matched with the extent of Living Z and Medium Density zoning shown on the ODP.*

Economic Assessment and housing affordability

A strong justification for the plan change provided by the economic assessment is the provision of affordable housing. No mechanisms are proposed to ensure lots are provided at the affordable levels upon which the economic assessment is based (compared with the Special Housing Areas which are subject to rules ensuring the delivery of a specified number of lots within specified price bands).

The economic report justifies the need for (and benefits of) the plan change on the basis of what appears to be the delivery of unrealistically cheap housing stock.

The economic report does not appear to have taken into account the capacity provided through the greenfield growth area to the northeast of Tosswill Road. An economic report by the same firm has also been lodged in support of PC72 in South Prebbleton, however the cumulative effects of both plan changes on supply and affordability have not been assessed.

The economic report is focussed only on supply within Prebbleton township. It does not assess capacity across the Greater Christchurch portion of Selwyn District.

7. *Confirm whether any rules are proposed to ensure the affordable outcomes are able to be delivered and upon which the economic report is based.*
8. *Confirm the accuracy of the predicted level of affordability of the housing stock to be delivered through the plan change.*
9. *If no rules are proposed, and the predicted level of affordability is increased, review the assessment of the benefits and need for the plan change that form part of the application.*
10. *The request appears to rely on Policy 8 of the NPS-UD. At its meeting on 9 December 2020, Council adopted an update its Housing and Business Development Capacity Assessment for the short, medium and long term <https://www.selwyn.govt.nz/property-And-building/planning/strategies->*

and-plans/selwyn-district-plan/plan-changes) should be considered in regard to the above request. There are a significant number of plan change requests currently lodged with Council. While the capacity assessment provided with the request considers the percentage increase that the request will add to Prebbleton, please amend this to consider the additional capacity provided to the wider district over the short-to-medium term timeframes considered by the NPS-UD. The capacity proposed within the other plan change requests is available at <https://www.selwyn.govt.nz/property-And-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes>

Planning assessment

- 11. The assessment of the criteria in Policy 1 of the NPS-UD for 'well-functioning urban environments' provided with the request only considers this in relation to Prebbleton. The urban environment is considered to encompass all of Greater Christchurch. Therefore, please provide an assessment of how the request would contribute to the function of the wider urban environments of Prebbleton township, the surrounding district, and the Greater Christchurch area.*
- 12. Please provide an assessment against Change 1 to the Canterbury Regional Policy Statement;*
- 13. The landscape assessment determines that the plan change is acceptable based on a series of mitigation measures being in place. Please confirm which mitigation measures are to be delivered as part of the subdivision process (and identify the matters of discretion that enable them to be delivered), and whether any mitigation measures need to be delivered through rules and/or amendments to the ODP as part of the plan change process.*
- 14. Confirm whether direct access for individual lots is proposed onto Trents, Hamptons and Shands Road. If no direct access is proposed (particularly with reference to Shands Road) whether the ODP and/or rule amendments are required to secure this outcome.*
- 15. Confirmation as to how the existing water race that runs along the site boundary is to be managed i.e. retained, bridged to individual lots, piped etc. The ODP appears to include a blue dotted line along Trents Road with no indication in the key as to what this means.*

Consultation

- 16. Please provide an update on any pre-lodgement consultation with Mahaanui Kurataiao Limited on behalf of mana whenua.*

Other matters

Feedback has been received on geotechnical and three-waters servicing matters with no further information sought on these topics. Feedback has been received from Andrew Mazey, Council's Transportation Asset Manager, however as this feedback is more in the nature of comments rather than RFI matters it will be forwarded to you separately for your consideration.

Process from here

Once the Council has 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. 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 do not hesitate to contact me on (03) 964-4630 or jonathan@planzconsultants.co.nz if you have any questions.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Jonathan Cleese', with a long horizontal flourish extending to the right.

Jonathan Cleese

Consultant Planner

On behalf of the **SELWYN DISTRICT COUNCIL**