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SUBMISSION ON PLAN CHANGE 7 TO THE SELWYN DISTRICT COUNCIL

To: Plan Change 7 to the Selwyn District Plan
Selwyn District Council
P O Box 90
Rolleston 7643

Name of Submitter: Broadfield Developments Ltd

1. This is a submission on Plan Change Number 7 to the Selwyn District Plan.
2. The specific provisions of Plan Change 7 that this submission relates to are as follows:
 - Plan Change 7's relationship with the Operative Plan and in particular its relationship with the recently approved Plan Change 4.
 - Staging requirements of Plan Change 7.
 - Site coverage on Broadfield Estates land.

3. Our submission is as follows:

Plan Change 4

Broadfield Estates Ltd owns the land that was the subject of the recently approved Plan Change 4 to the Selwyn District Plan. The ODP that was approved via Plan Change 4 is attached as Appendix A to this submission.

Plan Change 4 rezoned approximately 28 hectares of land at 86A Edwards Street, Lincoln, from Rural (Outer Plains) to Living 1 (Deferred). This Plan Change restricted any residential

development of the land to when adequate capacity in a local authority operated reticulated sewage treatment facility was available. It also required that any subdivision of the land shall: *'demonstrate the ability to achieve a minimum density of 10.5 lots/households per hectare over the whole of the outline development plan area.'*

The currently proposed Plan Change 7 also covers the land area previously considered by Plan Change 4. Plan Change 7 purports to be a key method for giving effect to Proposed Plan Change 1 to the RPS. It also follows on from the Lincoln Structure Plan which was published in May 2008. It recognises the need to coordinate urban growth with the provision of affordable infrastructure.

Plan Change 7 proposes the land in question to be zoned Living Z, a Living zone which requires an ODP to be incorporated into the District Plan, and proposes a minimum average site size of ten households per hectare. An ODP for the area is provided in Plan Change 7 and is attached as Appendix B.

This submission seeks that the purposes and methods promoted and agreed to within Plan Change 4 are retained for the site in question. This means that any subdivision of the land is a controlled activity once the issue of sewage disposal is resolved. In contrast with this, Proposed Plan Change 7 results in any subdivision of the land being non-complying until an ODP is made operative in the District Plan. It is noted however, that as the land contained within Plan Change 4 is already contained in an ODP that was included and made operative as part of Plan Change 4, the non-complying status under Proposed Plan Change 7 must not apply.

Development Staging

The Lincoln Structure Plan phasing allowed for a three stage sequencing plan as follows:

Stage 1 from 2007 - 2017	1300 households
Stage 2 from 2017 - 2026	1100 households
Stage 3 from 2026 - 2041	1500 households
Total	3900 households

The decisions on PC1 of the RPS provided for the following two stage staging of Lincoln:

Stage 1 2007 - 2020	1740 households
Stage 2 2021 - 2041	2160 households
Total	3900 households

Plan Change 7 also proposes a two stage sequencing of development.

This submission supports the sequencing contained in the Lincoln Structure Plan, and requests that a strategy such as that contained within the Draft Plan Change 7 as it is considered that this concept is a workable approach to ensuring that the market is not flooded with properties, whilst still allowing for development to proceed as infrastructure becomes available.

Plan Change 7 on the other hand, as notified, anticipates that staging of development in the Lincoln area will occur in accordance with a staging plan attached to the proposal. This staging plan indicates the land the subject of this submission is within stage one of development in Lincoln. Given that only two stages are now proposed, there is a significant increase in the number of households provided for in stage one and there are already 688 allotments already appropriately zoned in Lincoln. (Including Lincoln Land Developments – 400 allotments; Fulton Hogan – 24 allotments; SDC Vegetable Block approx 30 allotments; and Broadfield Estates – 234 allotments). This is considered to be excessive, given the past uptake of sections for sale in Lincoln. Over the past 18 years, consumption of sections in Lincoln has been at an average rate of 33 per year (Source: CB Richard Ellis 19.3.10). When this is compared to the 688 sections within the Lincoln area, that are currently under construction or appropriately zoned at present, a substantial increase in uptake will need to occur to ensure that this land is adequately utilised and that infrastructure can be effectively and efficiently installed and utilised. Indeed, it would take approximately 20 years to utilise the existing zoned land at the current rate of uptake.

Over the remaining ten years of the 2007 - 2020 planning period, 1740 sections are proposed by Council via Plan Change 7, which is a rate of 174 per annum. At the Council's expected rate of uptake, approximately the first 4 years of the period are already provided for, within the existing 688 zoned or under construction sections mentioned above. There is a huge disconnect between these two scenarios.

It is considered that the Councils anticipated rate of uptake is extremely unlikely to occur (it would be a 527 % increase in the rate of uptake), and that the current proposed levels of development will result in up to seven subdivisions being constructed and sold on at once. This will lead to a lack of development integration and inefficient use of infrastructure. Efficient use of infrastructure is an objective of Plan Change 7. For this reason, Broadfield Developments Ltd submits that it is necessary to restrict development of Stage 1 land until 85% of existing zoned land is consumed.


The draft of Plan Change 7 mooted a staging process that was based on new land being opened up for development once 85% of previously zoned land had been developed. Broadfield Developments Ltd submits that this approach is an efficient way of ensuring that adequate land is available for development, whilst ensuring that inefficient early development of land, is not promoted.

4. Both the Living Z and Living 1 zone under PC4 have a site coverage of 35%. Broadfield Developments Ltd submits that a site coverage of 45% would be more appropriate for the subject land located at 86A Edwards Street. This is because the site benefits from ample areas of reserve space (approximately 25% of the site will be open space), thus providing a significant area of open space that is available for the whole community.
5. Inhabitants of Lincoln commonly require a large home of 220m² - 330m², and most do not seek to construct two storey dwellings. Indeed, in Lincoln Dale, there are 96 allotments with only three allotments not yet built on. To date, there are only three dwellings with two stories. An average section size of approximately 680m² (which is the average size of Living 1 sections after roads and reserves at 86A Edwards Street which must meet a density of 10.5 households per hectare), at a 35% site coverage allows for a dwelling with a footprint of only 238m² inclusive of garage space. Given this, it is considered that for the subject site, a maximum site coverage of 45% would allow for the future needs of inhabitants, whilst still providing a living environment that is characterised by open space. On an average size section of 680m² at 45% site coverage a home of 306m² could be built. The intensification anticipated in ECan PC1 needs to also address the site coverage to allow purchasers to build their choice of home size.

6. In conclusion, the relief sought by Broadfield Developments Limited is:

- To retain the Broadfield Estates Ltd land as a Living 1 zone under Plan Change 7, in accordance with the operative provisions of the plan under Plan Change 4.
- To allow for site coverage of 45% on Broadfield Estates Ltd land.
- To provide for future residential development to occur only once 85% of the existing zoned land has been built upon.

7. We wish to be heard in support of this submission.


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**Signature of submitter or person authorised
to sign on behalf of submitter**

Date: 13.4.10

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