

24 December 2020

Hughes Developments Limited
c/- Davie, Lovell-Smith
PO Box 679
CHRISTCHURCH 8140

Attention: Mark Brown

Sent by email to: mark.brown@dls.co.nz

Dear Mark,

PC200070: Private Plan Change Request to the Operative Selwyn District Plan from Hughes Developments Limited in Rolleston (Faringdon Far West) – Request for further information

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

Scope of Plan Change Request

1. The effect of the plan change request, if approved in the future, would be to leave the site at 130 Dunns Crossing Road (Lot 1 DP 70352), being a parcel of 3.9973ha, with a Rural (Inner Plains) zoning and surrounded on three sides by land zoned Living. This is an outcome Policy B4.3.3 seeks to avoid as it can increase the potential for reverse sensitivity effects. Please provide the rationale for excluding this parcel from the plan change request and address the conflict with Policy B4.3.3 and advise how reverse sensitivity effects may be addressed. Alternatively, please consider expanding the scope of the plan change request to include this parcel.

National Policy Statement on Urban Development 2020 (NPS-UD)

2. The request relies on Policy 8 of the NPS-UD as it asserts that it would add significantly to development capacity. At its meeting on 9 December 2020, Council adopted an update to its Housing and Business Development Capacity Assessment for the short, medium and long term¹. 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 Rolleston, please amend this to consider the additional capacity provided to the wider district over the short/medium/long term timeframes considered by the NPS-UD. The capacity proposed within the other plan change requests should be considered in regards to the above request.

¹ https://www.selwyn.govt.nz/_data/assets/pdf_file/0006/360735/PUBLIC-Agenda-Council-Meeting-9-December-2020.pdf pages 39-54

3. 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 the plan change area. 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 the Rolleston township, the surrounding district and the Greater Christchurch area.

Integration with other Plan Changes

4. As mentioned above, there are a significant number of plan change requests currently lodged with Council. Three of these – PC64 (also on behalf of Hughes Development Limited), PC73 and PC76 are adjacent to the area of this plan change request. Please advise what, if any, consideration has been given the position of key movement linkages and reserves between this plan change and the others mentioned. Details of all other plan changes can be found on Council's website².

Infrastructure

5. Please advise if there is development staging proposed and if so how will this proceed? This will help Council understand timing for delivery and funding of infrastructure.

Reserves

6. The plan change request have been reviewed by Council's Manager – Open Space and Property.
7. The public open space is based on the notion of a "cricket oval" and the plan change request mentions "game days". The Council has invested in a centralised large space of 33 ha (Foster Park) and, in the future, a larger district park to accommodate active sports requirements, as this is much more efficient in terms of sport delivery and land management. As such it does not support the provision of an area for active sports in this location. Further, use of space in this manner is not in accordance with the Rolleston Structure Plan. Please amend the relevant documentation to reflect that the purpose of this central reserve should be for a 'village green concept', with space for casual games, playground, amenity planting and passive areas for walking etc.

Notes:

- i. *The ODP shows the reserve area encircled by housing and commercial area and the Design Statement sets out the rationale for this including passive surveillance and providing for extra open space for the higher density housing. While this is supported, there is no road frontage shown for the reserve (apart from the connection at either end). It is however noted that the design statement suggests that the "ODP has appropriate flexibility with respect to additional local roads, including those around the neighbourhood reserve. There is thus inherent opportunity to locate local roads around the full perimeter of the reserve if desired". Council would like to emphasise the need for reserves to be visible and easily accessible and it will support a balance of road frontage and lots which directly adjoin the reserve.*
- ii. *It is also noted that the plan change request documents refer to using a predominance of native species: "With regard to vegetation the soft landscaping associated with reserves, street berms and stormwater swales will in almost all situations be dominated by indigenous*

² <https://www.selwyn.govt.nz/property-And-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes>

species from the local area". While this is good in theory, it can be problematic, for example street trees where form and function is required.

Transport

8. The Integrated Transport Assessment provided with the plan change request was reviewed by Council's Asset Manager – Transportation.
9. A critical intersection to this plan change, and others in the immediate area, is the extension of Shillingford Blvd (CRETS Southern Collector Road) where it intersects with Goulds Road and then extends west to Dunns Crossing Road. A roundabout at this new intersection with Goulds Road is planned by Council in 2029/30 which is also dependent on the realignment of East Maddisons Road west onto Goulds Road, as facilitated by PC64. How does this accord with the Applicants view on how staged access to the area and timing for this link based on the projected uptake of the PC area? In addition, what view does the Applicant have relating to the existing section of East Maddisons Road that now currently intersects with Goulds Road servicing Faringdon that would closed at that point with the advent of the roundabout?
10. Please amend the ITA to look more carefully at the possible alignment (or otherwise) of the roading and transport connections with the proposed PC73 area opposite and assess intersection type and alignments and LoS to provide confidence on this aspect. This should be coordinated with the PC73 Applicant.

Note:

- iii. *A critical intersection will the extension of Shillingford Blvd as above where it intersects with the arterial Dunns Crossing Road. This will be a main collector road for this area of Rolleston. With the type of changes envisaged below for the Selwyn/Goulds/Dunns Crossing Road intersection and change in roading layout this will be another important intersection and road link for the south of Rolleston.*
11. There are concerns with the cumulative traffic effects on the Selwyn Road corridor from growth to the south and south west of Rolleston, for which it is being used extensively. Both Dunns Crossing Road and Selwyn Road are proposed to be classified as an arterial roads in the Proposed District Plan as part of the expanding Rolleston arterial "ring road" route. The current Selwyn/Goulds/Dunns Crossing Road intersection has a poor alignment/configuration that is not suited to safely catering for more urban traffic on arterial routes. While the Novo ITA assesses this intersection as having an appropriate LoS, it identifies safety issues and states that *"there would be value in Council rationalising the layout"*³. However, the opinion that urbanisation in the area would improve matters is not supported; rather it is considered that it will exacerbate issues at this intersection. As the proposed plan change will contribute to significantly more traffic using this intersection on this arterial network, the need to mitigate any effects is the responsibility of the plan change proponent.
12. It is considered this intersection should be upgraded to roundabout. Having regard to other plan changes in this area⁴, please provide an assessment of this intersection and the necessary upgrades required to ensure that it operates efficiently and effectively. Through the ODP

³ Novo ITA paragraph 54 p.20

⁴ It is recommended that, if necessary, the proponent of PC70 liaise with the proponents of other plan changes in the vicinity of this intersection to coordinate an appropriate response.

development of this plan change, it is considered that a realignment of Goulds Road onto Dunns Crossing Road can be accommodated to enable a roundabout to be formulated.



13. Please also amend the ODP to incorporate any changes necessary to give effect to connections and layout associated the other plan changes within the vicinity of this request.

Notes:

- iv. *Council has just recently formed and sealed Dunns Crossing Road south of Lowes Road to Goulds Road. It is being advised Council will not look favourably on sewer mains and the like being installed on the new main carriageway alignment where this requires the road to be substantially dug up and other options need to be considered in conjunction with PC73 Applicant.*
- v. *Any traffic modelling required to substantiate or checks aspects with this PC or RFI shall use the Councils Rolleston Paramics traffic model administered by Abley Consultants on Council behalf*

Geotechnical Assessment

14. The Geotechnical Assessment provided with the plan change request was peer reviewed on behalf of Council by Ian McCahon of Geotech Consulting Limited and this is attached for your information. No further information is requested as a result of this peer review.

Preliminary Site Investigation (PSI) Report

15. The PSI report provided with the plan change request was peer reviewed on behalf of Council by Environment Canterbury.
16. In regards to 3/144 Dunns Crossing Road, the reviewer noted that the individual report recommended that the composite sample with the elevated arsenic be individually analysed, this was not done in the report. However, the overall summary report stated that because of the likely soil disturbance as a result of the development, the soil will be mixed, and that any potential contamination will be diluted. This is a different conclusion to the individual report. Because of the discrepancy between the two reports, it is requested that Engeo clarify (and justify) what their recommendation is.

17. In relation to 597 East Maddisons Road, the reviewer considered that the sampling was not extensive enough around the barn and storage area; there appeared to be a number of potential HAIL areas present within this area that weren't sampled e.g. areas around the stored vehicles, material stored within the barn etc. Please advise if any further sampling has been done around this area. Further, the sample maps were unclear, and the location of the lead-based paint sample was not shown.

Outline Development Plan (ODP)

18. Please terminate the possible future connections as shown on the ODP at the boundary of the plan change area rather than extending them into adjacent sites.
19. Please annotate the ODP (or supporting text) to include any measures appropriate to address reverse sensitivity matters between the Living and Rural zone.
20. The ODP should also be amended to reflect any matters raised in the points in this letter, particularly regarding roading, reserves and reverse sensitivity matters.

Proposed District Plan

21. Council notified its Proposed District Plan on 5th October 2020. While the list of statutory documents to be considered when changing a district plan, as prescribed in s74 and s75 of the RMA, does not include a Proposed District Plan, case law⁵ suggests that s74 is not an exhaustive list and that scope exists to consider the provisions of the Proposed District Plan. As such, please provide an assessment of the request against the relevant provisions of the Proposed District Plan, and in particular those provisions that have immediate effect.
22. Where new provisions are proposed to the Operative District Plan to respond to any of the matters raised above, it is recommended that consideration be given to the provisions included in the PDP, given to the need to align this plan change request with the PDP at some point in the future.

Consultation

23. It is noted that the plan change request has been provided to Mahaanui Kurataiao Limited for their comment. Please provide a copy of any feedback received.

Process from here

Once we have 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 requests.

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.

⁵ *Kennedys Bush Road Neighbourhood Association v Christchurch City Council* (W063/97, at page 20) and *Canterbury Regional Council v Waimakariri District Council* (C94/99, at page 15)

Please contact me on (03) 347 1809 or jocelyn.lewes@selwyn.govt.nz if you have any questions.

Yours faithfully
SELWYN DISTRICT COUNCIL

A handwritten signature in black ink, appearing to read 'J Lewes'.

Jocelyn Lewes
Strategy and Policy Planner