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16 March 2021
Selwyn District Council
CHRISTCHURCH

Attn. **Rachael Carruthers**, Planner

By email only: rachael.carruthers@selwyn.govt.nz

Dear Rachel

Request for Further Information: Plan Change 71

In your email of 24 November 2020 you advised that:

Pursuant to s37 and s37A RMA, I am doubling the timeframe to request further information in relation to this plan change, so that an adequate assessment of the effects of the proposal may be made. This is necessary as a result of the large volume of plan change requests that have been received since the NPS-UD 2020 came into effect and the interests of the community in achieving a consistent approach to them.

You identified a number of RFI matters that could be addressed and these have been consolidated in to your 2 February 2021 RFI.

In response to a question about changes in wording to the respective requests you advised on 9 February 2021 *"please answer the questions as they are in the February letter – further reflection allows for editing before formal questions are asked."*

For amendments to the application included in this response deleted text is shown as ~~strikethrough~~, and new text is shown as **bold/underlined**.

REQUEST DOCUMENT

1. There appear to be some procedural errors with the request document. Please review and amend as appropriate:

- a. The list of owners and occupiers does not include the land subject to the operative ODP for Rolleston Area 4.**

Response:

Noted. Amended as follows:

Property

Subdivision

Industry

Community

Environment

The location to which this application relates is:

1. A 53.89 ha site located at Rolleston and bounded by Levi, Lincoln Rolleston Roads and Nobeline Lane.

The names of the owners and occupiers of the land to which this application relates are:

131 & 139 Levi Road	Lot 2 DP 322710	M Purdon and NC Rasmussen	28.0900ha
Rear of 139 Levi Road	Lot 2 DP 416195	M Purdon and NC Rasmussen	2.3400 ha
294 Lincoln Rolleston Road	Lot 1 DP 67190	S R Chapman & NM Chapman	4.0000 ha
274 Lincoln Rolleston Road	Lot 2 DP 67190	2 Degrees Real Estate Ltd	4.0000 ha
232 Lincoln-Rolleston Road	Lot 3 DP 67190	PW Scott and RJ Scott	3.2820 ha
5 Nobeline Drive	Lot 7 DP 483709	L File Smith & Partners Trustee	4.0805 ha
15 Nobeline Drive	Lot 8 DP 483709	JM & TL Whittaker Limited	4.0558 ha
25 Nobeline Drive	Lot 9 DP 483709	JM & TL Whittaker Limited	4.0393 ha
TOTAL			53.88 A

2. **A 7.1831 ha site located on the corner of Levi and Rolleston-Lincoln Roads (Rural Section 7556) owned by Wayne Robert Harper and Nelda Elizabeth Harper. This Site is shown as ODP Rolleston Area 4 in the Operative Plan.**

Attachment 1 contains the title for ODP Area 4.

- b. *The request makes no mention of the proposed changes to the operative ODP for Rolleston Area 4.*

Response:

Noted. See the revised sub-paragraph below:

- d) **Amend ODP Rolleston Area 4 attached in Appendix 1 by:**
 - **Showing a link to Broadlands Drive from the west of Lincoln-Rolleston Road through ODP Area 4 and across proposed ODP Area 5 to the proposed District Reserve;**
 - **Delete the large lots notation on the boundary with proposed ODP Rolleston Area 5.**
- c. *The applicants for this plan change are listed as Four Stars Development Ltd and Gould Developments Ltd, but the request is signed on behalf of Trices Road Rezoning Group.*

Response:

Noted. See the revised page at **Attachment 2**.

2. ***Please provide a landscape assessment which identifies the existing natural and heritage features of the site and their values.***

Response:

Attachment 3 is a Landscape Matters and Visual Assessment that provides specific consideration of the natural and heritage features of the Site in support of the Urban Design Statement.

The Urban Design Statement in the application confirms that the Plan Change area comprises essentially flat farmland adjoining the existing Rolleston urban boundary (to the south). It is currently used as a horse training facility and rural lifestyle blocks. There are no significant natural features or ecological values within the Site. There are no existing water races on the properties.

Plan Change 71 includes an urban design statement which describes the existing landscape character and features, and its local context including the character of the surrounding environment.

The Landscape Matters and Visual Assessment addresses proposed interface treatments with neighbouring land including Levi Road, Lincoln-Rolleston Road, Nobeline Drive and the possible future District Park to the east.

APPROACH AND KEY FEATURES OF THE PROPOSED PLAN CHANGE

- 3. *The future use of the Council-owned land to the northeast of the plan change area has not been finalised, and may include a district park, full residential use, or something in-between. Your proposal therefore needs to provide for flexible scenarios along this boundary.***

Response:

Noted. The response to RFI 19 addresses the interface issues with the Council-owned land.

- 4. *Paragraph 20 – you propose to develop the rezoned lots in accordance with the General Residential Zone, which does not exist in the Selwyn District Plan (SDP). Please either amend the application to Living Z (as described in the request document), or provide additional justification for the introduction of a new zone. Please note the Council does not generally support the introduction of any new zones at this late stage in the life of the SDP.***

Response:

This is an error. The applicant's intention is to adopt the existing operative district plan zoning nomenclature but with a higher density for the plan change site under Living Z for ODP Area 5 at 12 hh/ha. The land in ODP Area 4 will remain as Living Z and at 10 hh/ha as provided in the Operative Plan.

A new zone is not proposed as shown in amended para 20 below:

- 20. *The proposal is to rezone 53.88 ha of Rural Inner Plains land at east Rolleston to Living Z, of which approximately 17.3 ha will be deferred until and if the CIAL 50 dBA Ldn airport noise contour is moved off this land. The proposed lots will be developed in accordance with the Living Z Zone standards, with a minimum average lot size of 650m², and minimum lot size of 500m², except for small lot development where lots will be in the 400-500m² size range.***

5. *Paragraph 21 – please demonstrate how the development proposes to achieve 12 households per hectare over the development area as a whole. This may include the provision of a conceptual development plan.*

Response:

Attachment 4 is an indicative yield assessment concept plan that demonstrates how it is possible to achieve 12 hh/ha as proposed.

6. *Paragraph 22 onwards – the application makes frequent reference to RO-DEV 9. From the context, this appears to be a reference to proposed ODP for Rolleston Area 5. If this is the case, please provide an amended document referring to proposed ODP for Rolleston Area 5. If this is not the case, please clarify what the reference is to.*

Response:

Noted. The reference to RO-DEV 9 uses terminology from the Proposed District Plan submission and should refer to ODP for Rolleston Area 5.

7. *Paragraph 23 – please expand this paragraph to include all the proposed changes to ODP Area 4, including the proposed increase in density.*

Response:

This Change does not amend the fundamental features of ODP Area 4 other than to:

1. Provide for the extension of Broadlands Drive through the southern corner of ODP Area 4 as required by RFI 17 b.
2. Remove the LLR sites on the eastern boundary with the Plan Change site.

ODP Area 4 will retain its Living Z zone 10hh/ha density; it does not adopt the 12hh/ha density proposed in the ODP Area 5 Plan Change site.

Para 23 is replaced with the following new paragraph 23 as below to include all the proposed changes to ODP Area 4, including confirming the proposed existing density.

23. Amendments to ODP Area 4 are also proposed. ODP Area 4 adjoins ODP Area 5 Site along the western boundary (as illustrated in Appendix 1). ODP Area 4 is not yet developed. The amendments will:

a) Ensure connectivity between the two development areas, by way of

- **extension of Broadlands Drive;**
- **provision for two road connections in to the northern block of ODP Area 5.**

b) Remove the medium density area on ODP Area 4's eastern boundary. The overall density of ODP Area 4 will remain at 10hh/ha.

8. *In paragraph 45 you discuss the loss of rural productive potential and state that lifestyle blocks are proposed within the Airport Noise Contour, which will enable the use of land for small-scale or low level rural activities. Given that you are in fact*

proposing residential development of this land within the foreseeable future (assuming that the CIAL contour moves in 2023), please explain how the short-term retention of 4ha blocks would retain rural uses over the medium term.

Response:

There are in place confidential contractual agreements about the Plan Change Site including the timing for when ownership changes are triggered. In essence the need for 4ha blocks will only arise if the CIAL contour does not shift, and if one of the landowners does not exercise an option to retain the land under the noise contour.

The detail in this confidential agreement can be put before Commissioners at any hearing.

4 ha is the minimum permitted lot size for subdivision and a dwelling under the existing zoning for the Site (Rural Inner Plains). A 4ha block is a common standard in district plans that acts as a land use bridge between large acreage, or intensive rural land uses, and different levels of predominantly residential activity where 1ha blocks are de facto rural residential/lifestyle blocks. A 4ha (10 acres) block is large enough to have a degree of inherent flexibility and capacity to be used for a range of rural activities simply by its size. Those uses can range from low intensity activities such as grazing, run-off leasing for livestock, woodlots, small scale harvesting of forage and seed crops to higher intensity land uses which often require capital investment in irrigation or other production infrastructure like tunnel houses or growing canopies.

The applicants cannot guarantee rural rather than lifestyle land uses on the intended interim 4ha lots, but the issue is to find an appropriate medium term custodial use of the land pending decisions on the CIAL contour. In practice, the 4 ha subdivision option under the Rural Inner Plains zoning will not be exercised in any case unless the contour does not shift. If this were to occur (highly unlikely) then the vendor could place restrictions on the siting of houses on each of the 2 x 4 ha blocks possible, to facilitate future possible urban subdivision at a density of 12 hh/ha.

9. The application describes the difficulties faced on the Rasmussen/Purdon land in relation to continuing their existing operation, and in paragraphs 45, 46 you appear to use this as the basis for your statements that productive farming of any description is no longer feasible. Given that the land is predominantly LUC Class 2, described by the classification system as “very good land with slight physical limitations to arable use, readily controlled by management and soil conservation practices. The land is suitable for many cultivated crops, vineyards and berry fields, pasture, tree crops or production forestry” (Land Use Capability Survey Handbook 3e), please provide sufficient evidence to support your statement that productive farming of any description is no longer feasible in the proposed plan change area.

Response:

The statements about future productive farming use of the Site, notwithstanding the Class 2 soils, arise both from the realities of farming where urban activities are your immediately adjoining neighbours, and the simple proposition that the scale of capital expenditure invested, and the infrastructure specifically developed, on the Site for a specialised, niche

state-of-the-art horse training facility means the Site is largely “over-capitalised” for any other rural use. The application notes that the Site has a capital value of approximately \$8.1 million. That is a significant cost to be borne upfront before any land use conversion or development that you suggest may be possible by an alternative land use that does not rely on, or that can usefully re-purpose the specialised assets on the Site.

The application states that the site has two specifically designed and formed training tracks, it has 40 stables, 2222m² in a high-tech barn. The set-up cost alone was \$3.24 million.

The issue is not about the soils and their quality. It is about finding a future land use that may or may not benefit from the LUC Class 2 soils and that can carry the upfront cost of the investments locked in to the Site to date.

Alternative productive activity would, like the Rasmussen/Purdon operation, similarly face significant reverse sensitivity issues with neighbouring existing or zoned residential activity, and the proposed district park activity adjoining to the east. Nuisance/noxious farming operations could include spray drift, dust, and farm machinery noise (including night-time harvesting).

The Site has become, and will continue to be, an island of rural land stuck between urban land uses.

10. Paragraphs 47-48 – given that subdivision inevitably releases contaminants into the environment, not least in the form of dust during site works, please revisit these paragraphs.

Response:

Noted and notwithstanding that the current proposal is only for a re-zoning (as below in RFI 11) an amended para 47 below addresses this issue that will arise at the land development stage following re-zoning and subdivision consent.

47. Discharges of contaminants in to the environment are likely at the land development stage following re-zoning and subdivision consent. These may take the form of dust from earthworks, noise from machinery, and sediment-laden water or the tracking of soil on to existing roadways and from there in to road-side drainage systems. All such discharges can be managed through conditions of consent on the subdivision, and through regional council consents.

11. Paragraph 53 – given that the current proposal is only for zoning rather than development, it is premature to state that there will be no hazardous installations. Please revisit this paragraph.

Response:

Noted and a new para 53 states:

53. The objective of the proposed plan change is to enable residential development. No commercial or community facilities other than reserves are proposed. This means there will mostly only be domestic scale use of services such as LPG or other hazardous substances.

STATUTORY PLANNING ASSESSMENT

12. 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.

Response:

The NPS-UD 2020 does not make it explicit the scale at which individual proposals such as Plan Change 71 are to be tested against, in particular whether it should be at a local, sub-regional or regional scale. The Selwyn District Council is a Tier 1 local authority which itself has responsibilities for enabling housing capacity within its district within the short, medium and long term. This would suggest that focus of assessing proposals against Policy 1 of the NPS-UD should be more localised.

Nevertheless, RFI 12 has been responded to as requested.

Clearly the Plan Change proposal satisfies Policy 1 within a township frame of reference.

That is the findings of the Urban Design assessment (Appendix 2 of the application). That assessment considers the urban form arising from the proposal and in particular whether the direction of growth provided for by this Plan Change application will create an appropriate urban form and density for the Rolleston township. The Urban Design Assessment addresses key elements of a well-functioning urban environment in terms of:

1. Movement and connectivity
2. Placemaking and green spaces
3. Lifestyle choice and density
4. Interfaces with adjoining land.

That Assessment identifies six key features of the proposal:

1. Continues the direct green link between Foster Park and the new district park/reserve through the extension of Broadlands Drive;
2. Provides for future connections to adjacent development in the future;
3. Delivers residential development at a minimum density of 12 households/hectare and provides for a variety of residential house types, lifestyles and price points;
4. Promotes social interaction and neighbourhood cohesion through the inclusion of neighbourhood reserves and strategically located local connections internal and external
5. Encourages active transport modes through the provision of shared paths that provide both internal connectivity as well as links to the wider Rolleston area with a focus on walking and cycling and building on the close walkable connection to the town centre;

6. Balances the constraints of site shape, geometry and the uncertainty of the noise contour line with the desire to provide a cohesive well connected residential environment;
7. Responds sensitively to its interfaces with both existing and future adjacent development and the District Park.

The Plan Change proposal sits square with Policy 1 at a township level.

At a District level the start point for assessing how the plan change proposal sits against Policy 1 lies with the strategy adopted in the Operative Plan that *“seeks to consolidate future residential growth in the existing townships of Lincoln and Rolleston, and to a lesser extent Prebbleton. This consolidation will provide housing for the increases in the population while creating a more compact urban form...”* (B4.3 Residential and Business Development Issues).

The District Plan also confirms the place of the Greater Christchurch Development Strategy in setting out a settlement pattern for the District:

Greater Christchurch Urban Development Strategy

The Greater Christchurch Urban Development Strategy is a long-term planning project aimed at managing Greater Christchurch’s population growth. The Strategy is a partnership between Environment Canterbury, Selwyn and Waimakariri District Councils, Christchurch City Council and the New Zealand Transport Agency (bringing together the former Transit New Zealand and Land Transport New Zealand entities). Through a set of agreed actions and a framework about how the Strategy will be managed, it sets out a settlement pattern for residential, commercial, business and rural residential growth to 2041.

The Strategy:

- *Reinforces the Selwyn communities desire to maintain its uniqueness and individual character;*
- *Encourages townships to become more self-sufficient, without attempting to duplicate the range of facilities that are in Christchurch City;*
- *Sets a broad framework for growth within which Council can facilitate market driven township growth through mechanisms such as structure plans (and subsequent outline development plans as part of a change to the District Plan);*
- *Sets density targets to encourage a full range of section sizes in a township to accommodate all ages and the increase of single person households;*
- *Encourages new growth to be designed in a manner that integrates and connects to the existing township; (B4.3 Residential and Business Development Issues).*

The Operative Plan seeks to ensure the growth and development of its main towns are co-ordinated, integrated for servicing purposes, exhibit good urban design and are managed through ODPs. All these measures are directed at ensuring development creates well-functioning urban areas that meet the needs of people, are attractive to live in and that will become more self-sufficient over time.

The proposed Plan Change will contribute about 660 new lots in a favourable location on the edge of the District’s major town and so is entirely consistent with the aim of growing Rolleston in an efficient and effective manner. It will:

1. provide a variety of dwellings enabling diversity in the type, price and location of different households in a district with very rapid population growth, including a higher density (12 hh/ha), than the existing LZ facilitating greater provision of housing for smaller households, including retirees and single person households as well as families;
2. provide good accessibility to the rest of the District being an edge site well serviced by arterial roads and close to the state Highway;
3. support the competitive operation of the land and housing market creating choice and diversity within the District with competing location urban location options at Lincoln, Prebbleton and West Melton;
4. support reductions in greenhouse gas emissions at a District level by building onto the increasing self-sufficient primary District urban area in a compact, integrated, accessible manner;
5. be resilient to the likely current and future effects of climate change reflected in sea-level rise and storm surges, adaptable to heavy rainfall events/frequency, and the potential for building and landscape design to mitigate increased mean temperatures or amplification of heat extremes.

To the extent that at a township and district level the plan change proposal satisfies Policy 1 NPS-UD 2020, then that must hold true for the Greater Christchurch scale too. It is a question of degree. The development of the Plan Change 71 land reflects the spatial pattern of development contemplated within the Greater Christchurch urban area by, amongst others, the Greater Christchurch Urban Development Strategy. Within the Selwyn and Waimakariri Districts, urban growth is to be focused around key locations that have a high degree of transport connectivity to the rest of the Greater Christchurch area. At the same time, self-sufficiency of key population centres such as Rolleston and Lincoln in the Selwyn District, and Rangiora in the Waimakariri District is to be promoted to contribute to well-functioning urban environments.

This is a significant proposal at 660 lots at full development. It will contribute to a well-functioning Greater Christchurch urban area by adding substance to a fast-growing growth node that satisfies Policy 1 matters relating to housing choice and diversity, and especially in relation to creating a competition in the land market with the price points the development can provide compared to similar suburban development in the City and Waimakariri (see RFI 16 response). The proposal will support a competitive regional land and development market by offering additional and mainstream residential dwelling choices at a range of densities in a location identified in the regional development strategy.

Ongoing and timely infrastructure investment, and social services investment, sets up Rolleston in a favourable position to manage growth. The integration of development and servicing is no impediment to a well-functioning urban area even at the growth rates forecast or being experienced.

Recent highway investment by the Government ensures good accessibility at a regional level between housing, jobs, education, community services, reserves for car-based trips, while good provision is made for public transport and cycling options at a regional level. Being part of the Metro bus network linked to central Christchurch removes certain barriers to movement and access to services and amenities.

Plan Change 71 enables:

- a) Upgrades to Levi Road and key intersections improving access for residents to the west of the Site to community facilities including the District Park, and connectivity to the Southern Motorway;
- b) Future proofing future access to further land development east of the Site;
- c) Residential development at a density of 12 households/hectare and provides for a variety of residential house typologies, lifestyles and price points;
- d) Connectivity to the town centre western Rolleston through direct connections with the extension of Broadlands Drive and provides for connection to adjacent future residential development to the south and east;
- e) active transport modes with shared paths and on-road cycle lanes – linking community amenity areas and reserves;
- f) a sensitive response to its interfaces with both existing and future adjacent development.

The plan change application provides vital connections to adjoining existing and proposed development areas and both provides for and enables a consolidated urban form, consistent with providing a well-functioning urban environment on a scale wider than simply just the Plan Change 71 area.

Overall, the proposal will contribute to well-functioning urban environments at a localised, district and regional scale.

13. Your response to NPS-UD Policy 1(a) refers to the proposal having medium, standard and large lots supporting three housing typologies. Elsewhere the request uses the terms Low Density and Medium Density (small-lot and comprehensive), which terms are consistent with the terminology of the SDP. Please either amend your response to NPS-UD Policy 1(a) for consistency, or explain why different terms are required.

Response:

The NPS-UD 2020 assessment was originally drafted so it could cover both the submission on the Proposed District Plan, and the Plan Change application for the Operative District Plan. The assessment is understandable and clear when that is understood.

The plan change application to the Operative District Plan is intended to only use terminology specific to that Operative Plan ie reference is to small lot medium density and comprehensive medium density lots.

14. Your response to NPS-UD Policy 1(e) appears to be a 'copy and paste' error from Proposed Plan Change 72 Trices Road. Please review and resubmit.

Response:

We do not see such an error. All references are appropriate for Rolleston.

15. Your response to NPS-UD Policy 1(f) does not reflect all the likely effects of climate change. Please amend and resubmit, including an assessment of the likely effects of flooding associated with storm events (flood ponding rather than river flooding).

Response:

A Flood Hazard Assessment is at Appendix 3 of the application.

It is acknowledged that parts of the Site contained in ODP Area 4 and ODP Area 5 are identified as subject to flooding in a 1:200 and 1:500 year flood event. At para 51 b) of the application it is noted, amongst other things, that:

- a) *The key patterns during the one-in-200-year and one-in-500-year events are:*
- *generally the site will have some minor ponding, being less than 200mm. There is minimal ponding between 200-500mm and isolated spots with depths of 500-1000mm.*
 - *the site does not appear to be receiving flows from adjacent sites.*

The applicants note that the Council's flood maps take into account future climate change effects as explained in the introduction to the flood hazard information on the Council's website:

While the current District Plan manages a risk from a 50-year flood event, in the new Proposed District Plan we are required to identify and manage areas at risk from more extreme rainstorms and taking into account climate change effects over the next 100 years.

Additionally the Council web site sets out the current practice in managing flood risks:

- *In line with the current practice, when there is a proposal to subdivide or build a new dwelling in an area at risk of flooding, a site-specific assessment would be required. The assessment would determine the required minimum floor height level of any new building.*
- *The district-wide minimum building floor height would be 300mm above a 200-year flood level event (instead of the current requirement of 300mm above a 50-year flood level event).*
- *The site assessment would also look at whether the proposed building site meets the criteria for being in a 'high hazard area'. If it does, then additional restrictions would apply. In some circumstances, where the flooding is particularly deep or fast-flowing, this may rule out building in that location.*

The applicants are aware of these requirements and have built these considerations in to its proposals and in to its plans for the Site.

16. The requests 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 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 regards to the above request.¹ 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 term timeframe considered by the NPS-UD. The capacity proposed within the other plan change requests (available at <https://www.selwyn.govt.nz/property-And-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes>) should be considered in regards to the above request.

Response:

The RFI specifically asks for, and only asks for, the additional capacity provided to the wider district over the short term timeframes (0 - 3 years/2020-2023) considered by the NPS-UD 2020.

We note that the Council adopted an update of its Housing and Business Development Capacity Assessment in December 2020. We note too that the update has yet to be reflected in statutory planning documents.

Without necessarily accepting the accuracy of predicted demand undertaken as part of the development of the Council's Housing and Business Development Capacity Assessment 2020 (HBDCA), it is noted that Appendix 1 to that Assessment sets out the changes since the earlier 2018 version.

The proposed change will create approximately 660 lots at full development and provide for the equivalent number of additional households or dwellings. The Table below responds to RFI 16 by providing data for all private dwellings in Rolleston, and for the District, and the percentage development capacity contribution made by Plan Change 71 at full development.

	2018 (count)	PC 71 %
Rolleston occupied dwellings	6144	10.7
Rolleston population	17,499	
Selwyn District Occupied dwellings	20,754	3.2
Selwyn District Population	60,561	

Statistics NZ: data for resident population, and private dwellings (occupied, vacant, under construction)

This data shows that, assuming each lot represents one occupied dwelling, Plan Change 71 at full development will add 10.7% to the number of dwellings in Rolleston as at 2018, or 3.2% to the number of dwellings across the District.

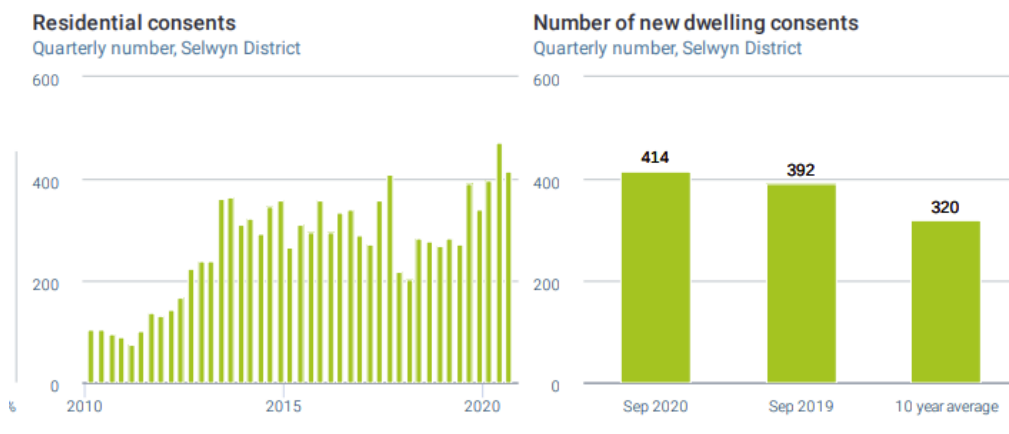
The Council December 2020 Update of its Housing and Business Development Capacity Assessment shows that there is a short term capacity of + 2543 developable lots in the short term (2020-2023) in the Greater Christchurch portion of the District. That is lots within existing development areas that are zoned and feasible for development. It is moot whether that update is still current given the analysis draws on what is now "old data" in a rapidly moving housing market where the ongoing demand for land and lots is reflected in the ongoing lift in section prices in Rolleston with the \$200,000 level now consistently being exceeded.

If this Plan Change was adopted now it would have the effect of increasing this supply of short term capacity to +3203 lots. The 660 lots in this proposal, if available on the market now, represents an additional 26% of the available capacity for that part of the District in Greater Christchurch for the period 2020-2023 as identified in the Update Report. As such the additional lots will not overwhelm the existing supply, but rather provide an important buffer to any unevenness in uptake of lots. That is as anticipated by the NPS-UD 2020 which, among other things, is framed to ensure that there is adequate supply of available developable land, rather than anticipate the market by strictly allocating or apportioning the location and timing of release of developable land.

Policy 2 NPS-UD 2020 is relevant (emphasis added)

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

The Quarterly Economic Monitor by Infometrics for Selwyn District reported to the 20 February 2021 Council meeting confirms the on-going pressures on the housing market in the District. Sales volumes in Selwyn grew by 16.1% and residential building consents were up 33.4% in the past 12 months compared to 8.1% for consents for the Canterbury Region. September 2020 was the second highest quarter on record for residential building consents in Selwyn at 414 consents. That is about 1600 consents for a calendar year albeit it is for the District as a whole.



Realistically, if this level of demand or activity were to continue over the short term i.e the next 3 years, then the identified capacity of +2,543 is hugely insufficient at best and certainly does not allow for much competition in the market. That available capacity will be taken up at current building rates in less than two years. Realistically, if Plan Change 71 were approved sooner rather than later it could add significantly (41 % or 660/1600) to the capacity required on an annual basis for building consents for residential dwellings accepting that the building consent figures are for the District as a whole.

When assessed against the calculated shortfall of - 2737 dwellings in the 10 year medium term, the 660 lots in this proposal account for potentially 24.1% of that shortfall. In that regard it provides a significant contribution to offsetting the imminent medium term under capacity and in a location identified in the District Plan and the Urban Development Strategy as a key part of the spatial distribution of growth areas.

The Executive Summary confirms that there is a deficit in capacity of -2737 in the medium term (2020-2030), and -18,337 in the long term i.e. to 2050. This shortfall reflects a predicted future demand of 24,000 households as against an estimated feasible development capacity of 5,663 households. As a consequence, all of the plan changes lodged with the Council have the potential to contribute significantly to meeting future demand out to 2050, Plan Change 71 included. Aside from meeting the predicted future demand, each and every one of the plan change applications, if approved, will enable a greater degree of competitiveness in the residential market for both the Selwyn District and Greater Christchurch in potentially the short, medium or long term. This is entirely consistent with the direction of the NPS-UD 2020 which is to provide for a supply of housing stock which exceeds demand.

An analysis which requires an assessment of Plan Change 71 in the context of other plan change applications, the majority of which are at a very early stage in the RMA process and most not publicly notified at the time of the RFI request, is inherently speculative and uncertain. In particular, there is no guarantee that all or any of the current plan change applications will be approved by the Council either in whole or in part thereby affecting the overall yield.

The applicant declines to make such an assessment against those proposals. The overall assessment of lots yielded by the various Plan Changes is better considered by the Hearing Commissioners, and in a manner or in a detail that the Commissioners direct the parties.

APPENDIX 1 – OUTLINE DEVELOPMENT PLANS

- 17. *Please provide an amended ODP for Area 4, including all required text, that:***
- a. Incorporates all required changes, including text changes required.***
 - b. Emphasizes the importance of the indicative primary route aligning with both Broadlands Drive and proposed ODP Area 5.***

Response:

Attachment 5 contains an amended ODP Area 4 and a combined plan showing ODP Area 4 and ODP Area 5 together which clearly shows the indicative primary route aligning with both Broadlands Drive and the connection across ODP Area 4 and proposed ODP Area 5.

Attachment 6 is an amended narrative for ODP Area 4.

- 18. *Please provide an amended ODP for proposed Area 5, including all required text, that:***
- a. Aligns the northern-most primary route with ODP Area 5.***
 - b. Shows these pedestrian/cycle connections as also able to accommodate roading as well, in case there is a need to service the District Park with say road extensions into it to for carparks etc. Maybe a “future transport link”?***



Response:

Attachment 7 is an amended ODP Area 5.

This addresses RFI 18 by showing:

1. Alignment of the northern-most primary route between ODP Area 4 and ODP Area 5.
2. Future transport links in the southern block of ODP Area 5.

APPENDIX 2 – URBAN DESIGN STATEMENT

19. Please provide an amended urban design statement addressing the whole plan change area, including ODP Area 4, and addresses the following comments from Gabi Wolfer:

a. Please provide a visual assessment of the impacts for the residential neighbours to the west of the proposed site and rural sites to the south. Please describe how you propose to mitigate a compromised rural outlook, including any proposed amendments to District Plan provisions.

b. How will the proposed residential development integrate with the adjoining rural land, including managing potential reverse sensitivity effects associated with farming operations?

c. The statement raises concerns about boundary fencing, but does not consider the relevant rules of the SDP, and no changes to Rule 4.13 is proposed. Please amend the application for consistency.

Response:

Attachment 8 is a Landscape Matters and Visual Assessment that addresses RFI 19 a. – c.

APPENDIX 3 – FLOOD HAZARD ASSESSMENT

20. The flood hazard assessment provided does not include all of the land subject to the proposed plan change. Please provide an adequate assessment of the entirety of the plan change area, including the area covered by Rolleston ODP Area 4.

Response:

Rolleston ODP Area 4 is already zoned Living Z. The Council must have satisfied itself about flooding risks at the time it re-zoned the land. As there is no proposal to change the zoning of ODP Area 4, there can be no requirement to carry out another flood risk assessment.

This Change does not amend the fundamental features of ODP Area 4 other than to:

1. Provide for the extension of Broadland Drive through the southern corner of ODP Area 4 to ODP Area 5;
2. Provide two road connections in to the northern block of ODP Area 5;
3. Remove the LLR sites on the eastern boundary with the Plan Change site.

ODP Area 4 will retain its Living Z zone 10hh/ha density; it does not adopt the 12hh/ha density proposed in the ODP Area 5. The Council has published its flood maps and that information can be used at subdivision in relation to a specific subdivision layout.

A response to RFI 15 also addresses issues around flooding.

APPENDICES 6 & 7 – PRELIMINARY SITE INVESTIGATIONS

21. As outlined in my email of 14 December 2020, please provide an amended land contamination assessment or series of assessments that address the following concerns:

a. There are a few things that may have missed been out in the review of the aerial photos, particularly for 131-139 Levi Road and 274 & 294 Lincoln Rolleston Road, as there was no site inspection undertaken as part of the scope of works.

b. The areas where some potentially contaminating activities have not been included in the PSI report for 131-139 Levi Road and 274 & 294 Lincoln Rolleston Road, Rolleston are: i.

Uncharacterised stockpiles at the northern boundary (west end) of 294 Lincoln Rolleston Road

ii. Potentially treated timber cuttings(?) at the southern boundary (west end) of 294 Lincoln Rolleston Road

iii. Burnt patch near the northern boundary of 294 Lincoln Rolleston Road

iv. Domestic garage/workshop was mentioned in the PSI report that was erected in 2005, but no additional information has been provided

v. Burnt patch near the northern boundary of 294 Lincoln Rolleston Road

vi. Stockpiles near veggie patches at the southern boundary of 294 Lincoln Rolleston Road

c. The areas where some potentially contaminating activities have not been included in the PSI report for 232 Lincoln Rolleston Road & 5-25 Nobeline Drive, Rolleston are: i.

Uncharacterised stockpiles near the southern boundary of 139 Levi Road (Lot 2 DP 416195, Lot 2 DP 322710) observed in the 2010-2015 and latest imagery.

ii. Potential horticultural activity indicated by rows observed from 2004-2010 and 2010-2015 aerial photos

iii. A DSI report prepared by Bussell Developments for Lot 1 DP 416195 referred to a PSI report which determined an area potentially contaminated from a sheep dip on 5 Nobeline Drive (Lot 1 DP 416195). The PSI report has included this area as part of the Risk Area that's recommended for a DSI, but it would be good to investigate the possibility of the sheep dip in this area since it has already been raised in another report.

Response:

Attachment 9A and 9B are revised PSI Reports.

Attachment 9 is a revised geotechnical report.

Malloch Environmental has noted that it would be unusual to require a DSI (Detailed Site Investigation) before a plan change is approved. It is more commonly required at subdivision stage. At the Plan Change stage the Council only needs to be satisfied that there is a viable solution to address site contamination issues, ie the land can be economically remediated. It is unusual to require a detailed Remediation Plan ahead of subdivision.

APPENDIX 9 – INTEGRATED TRANSPORT ASSESSMENT

22. In reviewing the ITA for this application to include the changes proposed to ODP Area 4, please incorporate the following comments from Andrew Mazey:

Note: the responses to RFI 22 were done in response to the early advice on transport RFIs in December 2020.

Attachment 8 covers all matters confirmed in the February 2021 RFI and includes some other matters no longer sought as RFI's or matters that were expressed in a different way in that December RFI.

a. The application refers to Council undertaking an upgrade of the Levi/Lowes/Masefield Dr/Lincoln Rolleston Rd intersection. This is proposed for 2025/26 In the Daft (sic) Long Term Plan. While Council originally envisaged a roundabout, recent work undertaken with the SH1/Rolleston Access Business Case with the NZTA suggested traffic signals, with this PC and likely development and therefore more pedestrians and cyclists in the area this would add weight to this. LTP funding should cover either decision but if this PC was approved it would likely cement traffic signals relating to the extra local traffic generated in the area.

b. A section of the Broadlands Drive extension is still under the noise contours. If this section is constructed before any deferral is lifted, it will need to be constructed to full urban standard at the outset, to avoid future inconsistencies or upgrade requirements.

c. As Levi Road is the main arterial route from the Weedons Interchange, it is important that the route is still effective. What more could be considered here to address the LoS issues with the Ruby Drive-new ODP road intersection etc?

d. The frontages of all existing roads (Levi Road, Lincoln Rolleston Road and Nobeline Drive) will need to be upgraded to an urban standard as there will be direct site access.

Response:

All the advisory matters identified in RFI 22 are noted.

Attachment 10 addresses RFI 22 as appropriate.

Yours sincerely



RICHARD JOHNSON

Senior Planner

Attachment 1: Title for ODP Area 4 (RFI 1a).

Attachment 2: Revised application page (RFI 1c).

Attachment 3: Landscape Matters and Visual Assessment (RFI 2 and 19).

Attachment 4: Indicative yield assessment concept plan (RFI 5).

Attachment 5: Amended ODP Area 4 (RFI 17).

Attachment 6: ODP Area 4 narrative (RFI 17).

Attachment 7: Amended ODP Area 5 (RFI 18).

Attachment 8: Combined Plan of ODP Area 4 and ODP Area 5 (RFI 17).

Attachment 9: Revised geotechnical report

Attachment 9A and 9B: Amended PSI Reports (RFI 21).

Attachment 10: Integrated Transport Assessment comments (RFI 22).