



**aston**  
CONSULTANTS

*resource management & planning*

**A** PO Box 1435 Christchurch 8140 **P** 03 3322618 **M** 0275 332213

**E** info@astonconsultants.co.nz

**W** www.astonconsultants.co.nz

16 March 2021  
Selwyn District Council  
CHRISTCHURCH

Attn. **Rachael Carruthers**, Planner

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

Dear Rachael

**Request for Further Information: Plan Change 72**

In your email of 2 December 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.*

In your emailed letter of 2 February 2021 you sought further information which consolidated some matters identified by you in your 2 December 2021 email. The final requests are set out in bold italics below.

**REQUEST DOCUMENT**

- 1. In your preferred relief, paragraph a) refers to rezoning the Tuff land to Living 3, but paragraph c) does not provide an associated amendment to Table C12.1 (there is no 'Living 3' zone at Prebbleton, just 'Living 3 (Hamptons Road)' and 'Living 3 (Trents Road)'. Please amend and resubmit. (2 December 2020).***

***I note that you have applied to create a new Living 3 zone (there is no 'Living 3' zone at Prebbleton, just 'Living 3 (Hamptons Road)' and 'Living 3 (Trents Road)').***

***Therefore, please either:***

- a. Provide an assessment of the effect of creating a new zone (including on plan integrity); or***
- b. Amend your application to use a pre-existing zone. (2 February 2021)***

**Property**

**Subdivision**

**Industry**

**Community**

**Environment**

**Response:**

The applicants are adopting a “pre- existing zone”, Living 3 with a location reference to be consistent with that used elsewhere in Prebbleton. The alternative is to change the location appellations for all Living 3 zones for the entire Operative Plan and adopt a generic name, but that seems unnecessary and not that helpful. Plan integrity is best achieved by the approach proposed and maintains a simplicity in zone names.

Minor changes to boundary setback standards do not have the effect of creating a new zone. The proposed L3 zone (Hamptons/Birchs Road) adjoins the Living 3 (Hamptons Road) zone and will be subject to the same rules as the Living 3 (Hamptons Road) zone except that the front and internal boundary setbacks for the Living 3 (Trents and Shands Road) will apply i.e. 15m front, 10m for one front boundary where corner site; 5m internal boundary. These are more achievable and appropriate than the L3 (Hamptons) equivalent standards (20m, 15m for one front boundary where corner site, and 15m internal boundary). The lesser setbacks have been accepted by way of global land use consents at dwelling stage in the case of the Lincoln Living 3 and north east Rolleston Living 3 zones; and the L3 (Hampton Road) requirement under Rule 12.1.3.41 for exclusively native planting in publicly accessible areas shall not apply. This is considered too restrictive. In particular, native planting is not necessarily the most appropriate solution for street trees. The amendments are shown below (**new text bold and underlined**, text to be deleted shown as ~~strikethrough~~).

- a) Amend Operative Selwyn District Plan Planning Maps by rezoning the land identified above except for the land owned by Helen Nancy and Lawrence Napier Tuff Pt RS 3122 (2.4827 ha) and RS 39794 (0.3037 ha) (‘the Tuff land’) from Rural Inner Plains to Living Z; and rezone the Tuff land from Rural Inner Plains to Living 3 (~~Rural Residential~~ **Hamptons/Birchs Roads**); and
- b) Insert Outline Development Plan Area 5 attached in **Appendix 1** to ensure a coordinated and consistent approach to land development; and
- c) Amend Table C12.1 as follows

Township	Zone	Average allotment size not less than
Prebbleton	Living Z	Low Density: Average allotment size of 700m <sup>2</sup> with a minimum individual allotment size of 550m <sup>2</sup> <b><u>except for Prebbleton ODP Area 5 shown on Appendix 42 where the average allotment size shall be not less 650m<sup>2</sup>, with a minimum allotment size of 500m<sup>2</sup></u></b>
	Living 3 (Hamptons) <b><u>and Living 3 (Hamptons/Birchs Road)</u></b>	5,000m <sup>2</sup> minimum average allotment size (calculated across all allotments in the ODP area) and 4,000 m <sup>2</sup> minimum allotment size

d) Amend Rule 4.9.18 as follows

4.9.17 Any building in the Living 3 Zone (Trents Road/Shands Road, Prebbleton (as shown on the Outline Development Plans in Appendix 19) **and the Living 3 Zone (Hamptons/Birchs Road (as shown on the Outline Development Plan in Appendix x)** shall be set back at least:

- (i) 15 metres from any road boundary except on corner lots where a minimum setback of 10m applies to one road boundary
- (ii) 10 metres from the boundary of Lot 1 DP 52527
- (iii) 5 metres from any other boundary

**2. *Your proposed amendment to Table C12.1 for the Living Z zone at Prebbleton has the effect of creating another new residential zone in Prebbleton. Please amend and resubmit – your proposed density is better considered as part of the General Residential zone of the Proposed District Plan (2 December 2020).***

***Your proposed amendment to Table C12.1 for the Living Z zone at Prebbleton has the effect of creating another new residential zone in Prebbleton. Therefore, please either:***

***a. Provide an assessment of the effect of creating a new zone (including on plan integrity); or***

***b. Amend your application to use a pre-existing zone (2 February 2021).***

**Response:**

The applicant disagrees that it is creating a new zone.

It intends to use the pre-existing Prebbleton Living Z zone but with lower average and minimum lot sizes (50m<sup>2</sup> lower in each case i.e. 650m<sup>2</sup> not 700m<sup>2</sup> and 500m<sup>2</sup> not 550m<sup>2</sup> respectively). These proposed densities generally fall within the scope of Living Z rather than any other Living Zone. They are also consistent with Our Space Greater Christchurch 2018-2048 recommended inner Selwyn District density standard of 12 hh/ha (Recommendation 9 – see <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-final/Our-Space-2018-2048-WEB-FINAL.pdf>), as now reflected in the Proposed District Plan General Residential Zone standard).

The proposed density is considered consistent with the Operative District Plan approach to densities, as outlined below.

Part B 4 Growth of Townships B4.1 Residential Density Issues has the one issue:

- *The need for a range of section sizes and living environments in Selwyn District, while maintaining the spacious character and amenity values of townships.*

The Plan states that:

*The Township Volume of the District Plan uses the following basic strategy to address issues of residential density:*

- *Zones used to provide for living environments with differing residential density.*

The introduction to the Township Volume B4 Residential Density – Strategy states that existing urban densities have largely been matched in the now Operative Plan, noting that:

*The exception is in Living Z zones and Medium Density areas where greater densities are anticipated. These areas are subject to additional regulatory controls which will ensure high quality urban design outcomes to maintain the amenity of the towns.*

Lot size is only one matter that applies to the Living Z zone. All other standards and terms for the zone have been adopted for the application. The applicant's expectation is that the Living Z zone sought with the minor changes to boundary setbacks, and lot sizes, will fit comfortably within the parameters of the Proposed District Plan General Residential zone if the Plan Change succeeds. Increased densities can be considered where it represents sound resource management practice.

A submission has been made to the Proposed Plan requesting these specific lot sizes.

For the avoidance of doubt, the applicant does not seek a new zone at Prebbleton through this Plan Change.

- 3. Paragraph 55 of the overview mentions a minimum floor height proposal to address flood risk, but the requested changes to the District Plan do not include such a provision. Please amend and resubmit.**

**Response:**

Add new e) to preferred relief as follows and re-number d) as f).

Add new Rule 4.1.2

LIVING ZONE RULES — BUILDINGS

4.1 BUILDINGS AND NATURAL HAZARDS

**Restricted Discretionary Activities — Buildings and Natural Hazards**

**4.1.2 Erecting any dwelling or other principal building on land located in the Prebbleton ODP Area 5 shown on Appendix 42 with a minimum building finished floor level less than 300mm above a 200 year Average Recurrence Interval (ARI) flood hazard event shall be a restricted discretionary activity.**

Renumber Rule 4.1.2 as 4.1.3 and amend as below

4.1.**23** Under Rule 4.1.**2** the Council shall restrict the exercise of its discretion to:

4.1.2.1 The nature of any flooding or land instability and whether this makes the site unsuitable to erect the proposed building or undertake the proposed earthworks.

4.1.2.2 Any effects of buildings or earthworks in displacing or diverting floodwaters and increasing the potential risk of flooding elsewhere.

4.1.2.3 Any mitigation measures proposed.

**4. Please provide a landscape assessment which includes:**

- a) identifying the existing natural and heritage features of the site and their values;**

**Response:**

**Attachment 1** is a Landscape Matters and Visual Assessment prepared by a+urban which is supplementary to the Urban Design report included with the plan change application.

- b) discussing any fencing issues;**

**Response:**

**Attachment 1** is a Landscape Matters and Visual Assessment prepared by a+urban which is supplementary to the Urban Design report included with the plan change application.

- c) elaborating on the location of public green space and its function and use within the development – in particular, how a 900m<sup>2</sup> pocket park is considered appropriate in size and location.**

**Response:**

This small pocket park of approx. 900m<sup>2</sup> is proposed to provide protection for a cluster of existing mature trees that are currently part of a larger garden of one of the existing dwellings. The rationale behind the decision to retain this particular cluster of trees is primarily to provide a sense of scale and a natural break in the proposed development.

This measure will ensure that these trees can be retained without negatively affecting or shading adjacent new residential properties. The small pocket park will be publicly accessible with two road boundaries and will significantly add to the amenity of the surrounding streetscape and higher density of the proposed development. The pocket park also functions as the 'green gateway' into the Site and offers a 'focal point' and casual meeting place for the community.

For further detailed information refer to Landscape Matters and Visual Assessment in **Attachment 1**.

**5. How are potential reverse sensitivity issues between residential housing and operating farming to be addressed?**

**Response:**

Several measures are being proposed to address potential reverse sensitivity issues between the rural and residential environment. Refer to Landscape Matters and Visual Assessment (**Appendix 1**). Rural edge treatment and mitigation measures (page 9) and mitigation measures MM 7 and MM 8 (page 16) are relevant.

**6. Please explain why Living 3 is an appropriate zoning for part of Birch's Road (including given the existing active public transport/bus route) and discuss how future intensification can successfully occur within this area without compromising good urban design principles.**

**Response:**

Refer to **Attachment 1** Landscape Matters and Visual Assessment, in particular mitigation measure MM 9.

The Living 3 zone has been chosen to allow for the necessary lot sizes required to accommodate the existing dwellings as well as a generous setback to prevent shading of dwellings and associated outdoor areas by the large trees and dense vegetation that is to be retained along Birchs Road. This density also reflects the nature of the development on the adjacent land to the west across Birchs Road with approximately 50% of the block developed as larger residential sites creating a low density environment.

The southern part remains rural and is used for infrastructure and services (electricity). Retention of the established vegetation, provides a visual screen towards the road and the utility area but more importantly it will continue to support the formation a natural gateway into Prebbleton framed by large trees.

With regard to future intensification, the Living 3 area could be further intensified by either subdividing each of the 5000m<sup>2</sup> lots into 4 x 1250m<sup>2</sup> around a shared access or by identifying building platforms from the outset in the Living 3 zone to ensure dwellings are located in a manner that will allow for a Living Z type density to be achieved long term. However, this would require the removal of the vegetation strip with mature trees along this part of Birchs Road and compromise the natural gateway into the township.

The bus route on Birchs Road is a public transport route connecting Lincoln with Christchurch and is one factor supporting residential intensification. For that purpose a pedestrian link has been included to provide connectivity through the Living 3 zone to the Living Z area.

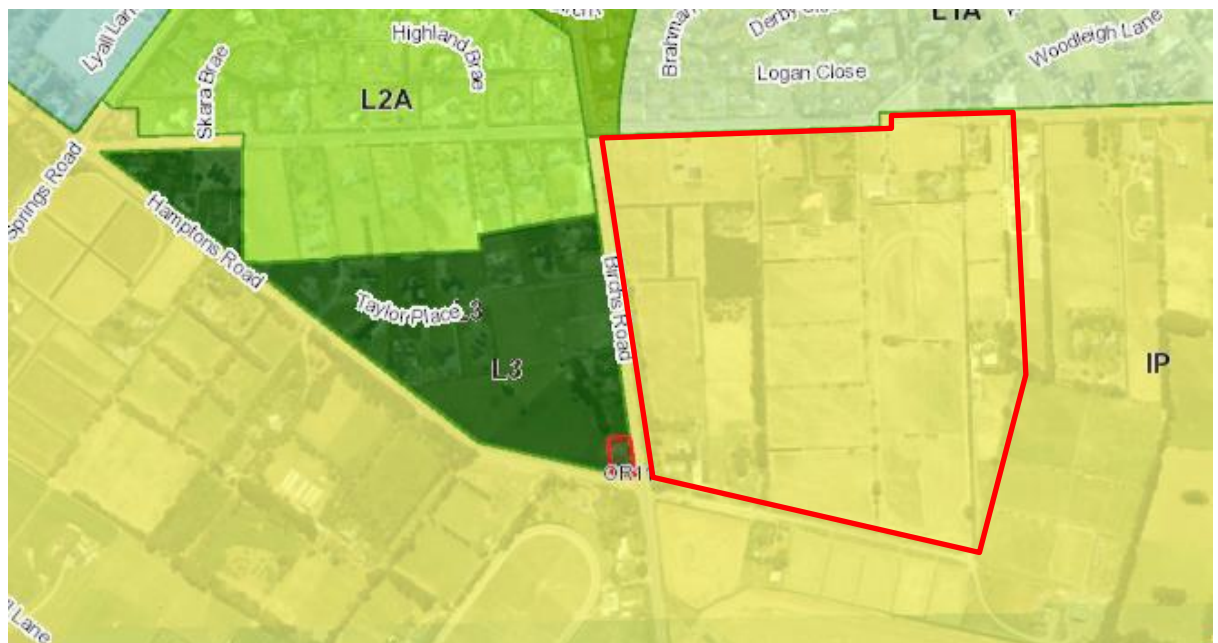


Figure 1: PC72 site (outlined in red) and adjoining existing L3 zone to the west

7. ***Please elaborate why only small-site medium density, as supposed to comprehensive development, has been considered for the site and how this satisfies the need for affordable housing with a variety of typologies.***

**Response:**

This aspect of the proposal has been revised. The proposed medium density (MD) is now intended to be flexible and able to support Small Lot MD as well as Comprehensive MD to ensure a variety of residential typologies can be provided and affordable housing can be achieved. The MD areas have been graphically removed from the ODP to avoid locking specific locations in; instead the narrative in support of the ODP has been revised to guide the location of MD within the Site.

8. ***The requests 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 regards 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 term timeframes considered by the NPS-UD. The capacity proposed within the other plan change requests (available at***

***[https://www.selwyn.govt.nz/\\_data/assets/pdf\\_file/0006/360735/PUBLIC-AGENDA-Council-Meeting-9-December-2020.pdf](https://www.selwyn.govt.nz/_data/assets/pdf_file/0006/360735/PUBLIC-AGENDA-Council-Meeting-9-December-2020.pdf) pages 39-54)***

**Response:**

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

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) considered by the NPS-UD 2020. The proposed change will create approximately 290 lots and provide for the equivalent number of additional households. The additional information requested for Prebbleton and District is set out below for occupied dwellings.

	<b>Occupied Private Dwellings 2018 (count)</b>	<b>%</b>
Prebbleton	1575	18.4
Selwyn District	20,754	1.3

Source: Statistics NZ: 2018 Census

The Council December 2020 Update of its Housing and Business Development Capacity Assessment shows that there is a short term available capacity of +2543 developable lots in

the Greater Christchurch Urban Area within the District in the short term (2020-2023). That is lots within existing development areas that are zoned and feasible for development. If this Plan Change is adopted it would have the effect of increasing this supply of lots to +2833 lots. The 290 lots in this proposal represents an additional 10.2% of available capacity for the Greater Christchurch Urban Area within the District as a whole in the short term. As such the additional lots will not overwhelm the existing supply, but rather provide a proportionate buffer to any unevenness in uptake of lots.

Similarly when assessed against the medium term case of a calculated shortfall of -2737 dwellings in the medium term, the 290 lots in this proposal can provide potentially 10.6% towards meeting that shortfall. In that regard it provides a significant contribution to the imminent medium term under capacity and in a location that is and has undergone significant recent growth. As set out in the application, Prebbleton is well-positioned to contribute to well-functioning urban environments and to provide a base population in support of community facilities and employment opportunities in SW Christchurch.

The applicant has not considered this proposal against all the private plan changes recently lodged with the Council. An analysis which requires an assessment of Plan Change 72 in the context of other plan change applications, the majority of which are at a very early stage in the RMA process, 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.

NPS-UD Policy 1 enables a variety of homes that meet the needs, in terms of type, price and location of different households. Within this context, the proposal (at +10%) is considered to add significantly to development capacity both at Prebbleton but also the wider District over the short-term timeframes considered by the NPS-UD.

**9. *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.***

**Response:**

The NPS-UD 2020 does not make it explicit the scale at which individual proposals such as PC72 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 the short, medium and long term within its statutory planning documents which are at district level only. This would suggest that focus of assessing proposals against Policy 1 of the NPS-UD 2020 should be focused on the Selwyn District that qualifies as an urban area.

Much of the analysis in para 35 of the application assessing the NPS-UD 2020 holds as true for the wider Greater Christchurch Urban area as it does for Prebbleton but at the appropriate scales and degrees.



The Site has been identified in the Selwyn Rural Residential Strategy (2014) as being fit for such development as Area 8. That, it would seem, confirms a Council view that rural residential/large lot developments are an important component of well-functioning urban areas such as Prebbleton. They do this by providing an area of transition between rural and residential, provide housing choice, provide different amenity and quality of environment settings and generally contribute to people's health and well-being.

MfE recommended key features of well-functioning urban environments are assessed here:

<b>MfE Feature</b>	<b>District scale</b>	<b>Greater Chch scale</b>
Variety of homes	The target market is family-based housing with some smaller units to help create a cross-section of community. The proposal sits square with the type of offerings in the District being a mix of Living Z, Living 3 and some medium density sited to best advantage. The proposal continues a successful and popular mix of housing typologies. No high rise, high density housing is proposed as that is more appropriate at the main activity centre Rolleston if at all in the District.	The proposal sits square with the type of offerings in Greater Chch being a mix of 500-650m <sup>2</sup> lots, some large lots and some medium density. The proposal continues a successful and popular mix of housing typologies. No high rise, high density housing is proposed as that is more appropriate at main activity centres or in support of City Centre rejuvenation.
Variety of sites for businesses	N/A residential only proposal	N/A residential only proposal
Good accessibility by public or active transport	The Site is well-connected to the rest of the District being on arterial roads. Bus services from elsewhere in the district pass through Prebbleton. Cycling facilities provide travel options in to other location and facilities in the district but distances are such that the focus of such activity is more for recreation/social activities.	The Site is well-connected to Greater Chch being on arterial roads and easily accessible to key transport corridors newly built in SW Chch. Bus services from elsewhere in the district pass through Prebbleton with direct connections to the centre of Chch at the bus exchange providing easy interconnectivity to other locations. The Site is on the Rail Trail cycle and walking route which links Lincoln, Prebbleton, Hornby and the Christchurch CBD. The Site is easily accessible to Chch Airport and the rail head at Addington.
Competitive land and development markets	The key growth areas are at Rolleston, Lincoln, West Melton and Prebbleton. An additional developer(s) increases competition both between district centres and has proposed development features that distinguish it from	Map A CRPS identifies FDAs which has the effect of focusing development and restricting the development market. Additional developers, in locations outside FDAs (all things being equal) assist in generating competition in land

	other current and known offerings in the land market.	supply and development options. The Site is an attractive development option with existing on-site features being protected in a reserve, and with abundant open space created by the stormwater management system, adjacent to a district reserve; these are all features which provide distinction and marketability across Greater Chch.
Reductions in greenhouse gases	See para 35 of the Application Prebbleton is at a scale and with wide range of amenities that, employment apart, mean the town is well self-contained minimising the need for travel. The scale of the development (290 lots) means any increase to greenhouse gas emissions across the District is less than minor.	See para 35 Prebbleton is at a scale and with wide range of amenities that, employment apart, mean the town is well self-contained minimising the need for travel. Travel times and distances to major employment areas are equivalent or less than between areas within Christchurch City (SW Christchurch employment areas, Rolleston, Lincoln, CBD etc). The scale of the development (290 lots) means any increase to greenhouse gas emissions across Greater Chch is de minimis.
Resilience to future effects of climate change	See para 35 The Site will not create adverse effects off-site from extreme weather events with the stormwater system proposed.	See para 35 The Site in a Greater Chch context is very benign in relation to adverse effects arising from climate change, and has little exposure to such over its 28ha.

The concept of well-functioning urban areas can also be assessed in terms of the key activity triangle of home – work – play and the geographic relationship between them including the movement connections between them. That lies at the heart of vibrant and resilient communities.

With the introduction of the new recreational reserve to the south of Hamptons Road it is paramount that the Site is developed as a residential environment to ensure good connectivity between the existing built-up township and the new Reserve. Should the plan change site remain rural it will retain its rural characteristics but also become an isolated space inaccessible by the public and will prevent the necessary connectivity that is essential for well-functioning urban environments. The ODP provides a north-south primary road with proposed cycle lane within the road corridor, which will connect the existing Prebbleton Domain in Tosswill Road with the new Birchs Road Reserve (**Appendix 1** Landscape Matters and Visual Assessment - Effects on landscape values).

Prebbleton is fast growing (para 6 of the application). A benefit of that growth is that the town is becoming much more self-sufficient as it reaches a critical mass to support key community facilities and amenities. Prebbleton grew by 38% 2006-2013 and 63% 2013-2018 to reach 4515 in population. It has developed in depth, it is not a linear shaped town and it is compact. There are no large areas of undeveloped or “brownfields” land that disjoint the urban fabric. It has a workable commercial core that complements the range of education facilities and recreation facilities. This shape means that at its scale Prebbleton’s home-play-education-services links are still tightly confined so it is easy to move around and to access each. At its scale Prebbleton is a well-functioning urban environment.

The Site will contribute to and consolidate the compact and readily accessible urban form of Prebbleton. It is within easy walking distance from the town centre, fills in a gap in the urban form between existing residential areas on the north side of Trices Road and the proposed Birchs Road Reserve, and be consistent with the zoning to the west, which already extends south to Hamptons Road.

As it grows Prebbleton provides more local work opportunities. Its proximity and ready accessibility to nearby major employment areas in Lincoln, Rolleston, SW Christchurch, the CBD and airport mean that the home-work link is well provided for.

#### **APPENDIX 1 – OUTLINE DEVELOPMENT PLAN AREA 5**

**10. *The colours used to indicate residential density on the plan appear to differ from the colours used in the key. Please review and resubmit.***

**Response:**

**Attachment 2** is a revised ODP with matching colours.

**Attachment 3** is a narrative in support of the ODP.

**11. *Please confirm that you are proposing that the trees to be retained on Birchs Road would remain in private ownership rather than being placed under public management.***

**Response:**

Yes the trees will remain in private ownership.

#### **APPENDIX 2 – URBAN DESIGN STATEMENT**

**12. *Please provide a visual assessment of the impacts for adjoining residential, rural-residential and rural sites. Please provide the measures that the proposal includes to mitigate a compromised rural outlook, including all relevant maps or diagrams.***

**Response:**

**Attachment 1** is a Landscape Matters and Visual Assessment supplementary to the Urban Design report included with the plan change application. Mitigation measures MM7 and MM8 are relevant.

**13. *How has the story of the land (and existing homes) been incorporated into the design and how will existing built form be able to positively contribute?***

**Response:**

The existing dwellings that could be retained have been identified as part of the urban design concept. Their associated domestic curtilage can be carefully integrated into the proposed roading layout to ensure direct access and a cohesive street scene. Existing dwellings can be placed onto larger lots to allow established vegetation around these dwellings to be retained without shading future residential lots. The design work underlying their positioning and access will then enable them to be further subdivided at a future date, if required. The existing dwellings, gardens and in particular the mature specimen trees can contribute positively to the development as they provide a sense of scale and visual focal points penetrating through the roofscape of the proposed residential development.

**14. *Please elaborate on the eastern interface and on your proposed boundary treatment.***

**Response:**

**Attachment 1** is a Landscape Matters and Visual Assessment supplementary to the Urban Design report included with the application. Mitigation measures MM7 and MM8 are relevant.

**15. *How, with no physical or natural boundary, will urban sprawl further east be prevented?***

**Response:**

Whether urban development or “urban sprawl” extends east from the Site will not arise from a decision by the Plan Change applicants; that will be a Council decision following due process either by resource consent, private plan change or by decisions on the Proposed District Plan.

Any decision to urbanise to the east of the site will be through one of the above planning mechanisms. It is for a future Council decision.

That said, there are some factors that will shape decisions on whether eastwards urban development is tenable and likely:

- a) The land in question (to the east of the plan change Site) has not been shown as an area for rural residential development in the 2014 Rural Residential Strategy, nor has it been identified as a urban growth overlay under the PDP.
- b) Policy B4.3.6: Encourage townships to expand in a compact shape where practical. This Policy constrains tenable re-zone options but it is solely directed to urban form, and does not provide for strong physical features typically used as defensible boundaries and to limit expansion of urban areas such as major roads, rivers, special landscape features etc.
- c) Responses to RFI’s 4 and 5 discuss the applicant’s approach to edge treatments and the management of reverse sensitivity. The proposed edge treatments will ensure the amenity and outlook for the rural properties is maintained to an appropriate level and addresses reverse sensitivity between the two different semi-rural activities, and at the same time provide for future connectivity.
- d) The Site is well contained on three sides: south, north and west.

- To the south the proposed future reserve will provide a strong natural boundary for development.
  - The area to the north of the Site is fully developed.
  - The majority of the area to the west is already developed residential or is used for infrastructure purposes. There is a small portion zoned residential but not yet developed. In addition, the retention of the vegetation strip, tall trees and the Living 3 zone assist in the prevention of further urban development to west.
- e) Along the eastern boundary there are no natural features that would assist in “holding” an urban edge. The control over the extension of the urban form in an eastward direction is a matter of strategic forward planning on behalf of the District Council.
- f) The ODP anticipates that in the long-term urban growth may be directed towards the east and has allowed for suitable future transport connections across the boundary into the rural area. This is a response to a Council request at a pre-application meeting that the Plan Change proposal provide for potential future road access points to the east on the ODP to keep the option open for future potential urban development in that direction. This is documented in Appendix 17 of the application.

**16. *How is Medium Density in this location (see figure 14 of the statement) be considered an appropriate housing typology next to rural land uses?***

**Response:**

Medium density (MD) areas have been graphically removed from the ODP to avoid locking them in which can create difficulties at subdivision design level where the finer grain of the development will be resolved.

This text has been added to the ODP narrative to guide the placement of Medium Density:

*Higher density in the form of comprehensive MD and /or small lot MD is to be located towards the centre of the development and adjacent to high amenity open space.*

**17. *What is considered ‘soft landscaping treatment’?***

**Response:**

The term ‘soft landscaping treatment’ means the use of planting versus ‘hard landscaping’ which uses built structures and hard surfaces.

**18. *Please elaborate on the role of Hamptons Road, which currently is a dead-end and does not link to the wider transport network.***

**Response:**

Refer to the Urban Design Report and the RFI 30 response to Andrew Mazey’s question.

Unless the urban form of Prebbleton extends further towards the east, Hamptons Road will most likely remain a dead end road.

**Attachment 1** addresses Landscape Matters and Visual Assessment in the urban form section of the Assessment.

Within the context of the proposed plan change and the future recreational reserve, Hamptons Road is expected to provide direct access to existing and proposed private properties and connect the north / south axis with Birchs Road. It will most likely also serve as an access road to several entry points into the reserve.

The nature of the adjacent activities requires Hamptons Road to be a low traffic environment, where it is easy and safe for pedestrians and cyclists to move across the site into the reserve. Along the residential edge a footpath should be included to provide access to private properties and connect the shared cycle and walkway of the north-south axis with the pedestrian path through the smaller, southern utility reserve. Exact details will be resolved at subdivision stage and in discussion with SDC with regard to the alignment of pedestrian connections into the recreational reserve.

#### **APPENDIX 5 – FLOOD HAZARD ASSESSMENT**

- 19. *The information currently provided is considered sufficient for this stage of development, but please note that as part of future work you may be required to demonstrate that your proposed site levels/stormwater infrastructure/road network etc will:***
- a. allow residential units to meet floor height requirements; and***
  - b. not exacerbate flooding on neighbouring properties***

**Response:**

Noted.

#### **APPENDIX 6 – GEOTECHNICAL INVESTIGATION**

***The report on the geotechnical investigation has been peer reviewed by Ian McCahon of Geotech Consulting Ltd, and is attached. As set out in that review, please provide the following:***

- 20. *The mean peak ground accelerations from the Bradley & Hughes model are set out in Table 1. Please advise how these relate to SLS and ULS levels of shaking and if the site has been “sufficiently tested” at SLS (MBIE 13.5.1), as past performance has been used to partially justify the TC1 classification.***

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFI 20. An amended Geotechnical Report is attached to that letter.

- 21. *Please supply the test data from the NZGD (location and logs) used to help identify the soil profile (8.3).***

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFRI 21. Machine excavated test pit logs are attached to that letter.

- 22. *Please supply the Ecan well logs and locations used to model the gravels as extending to 18m depth (8.3).***

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFI 22.  
Water bore logs sourced from ECan records are attached to that letter.

- 23. Please confirm that the number of tests either on site or close by, do adequately meet the intent of the MBIE Guidance (16.2) to adequately characterize the soils to at least 15m depth in terms of density and depth (MBIE 16.3).**

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFI 23.

- 24. Please supply the data from which the groundwater depth has been derived (8.4).**

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFI 24.

- 25. The RMA section 106 sets out natural hazards which need to be considered before granting subdivision consent. Please supply a natural hazard assessment.**

**Response:**

**Attachment 4** is a letter from Fraser Thomas addressing RFI 25.

#### **APPENDIX 7 – PRELIMINARY SITE INVESTIGATION**

- 26. The Preliminary Site Investigation has been reviewed by the Environment Canterbury Contaminated Land team. Please provide an updated PSI that adequately addresses their comments:**

- a. The PSI report has identified numerous potential HAIL. The HAIL sites that were identified in the PSI were summarised and indicated in the site plan, E00417-01 B. However, there are instances that the HAIL activities were mis-identified or not identified at all. For example, aboveground tanks were assigned HAIL I when it should be HAIL A17 or HAIL I for rubbish when HAIL G5 may be more appropriate. Or stockpiles were not assigned a HAIL category. There are also potential HAIL that were mentioned in the text but was not included in the site plan, E00417-01 B. Please provide an amended site plan showing these additional areas of concern.**
- b. There were also a number of sites identified as HAIL E1 and HAIL I, however, these sites can only be HAIL I after a detailed site investigation has confirmed that there are contaminants with concentrations that may be of significant risk to human health. Please note that these sites will therefore not be included in the LLUR at this time, until the results of the DSI have been received.**
- c. There are a number of sheds and dwellings within the investigation site that were considered for potential asbestos contamination, given their construction age. Currently, lead contamination in soil from lead based paint is not a HAIL category in the MfE HAIL list. However, there are many investigations which have demonstrated that soil around these structures were contaminated with lead from lead based paint use, often at concentrations exceeding the NES SCS residential. Please provide an assessment on lead-based risk in soil for all the areas currently and previously occupied by structures painted with lead-based paint, including: 299 Trices Rd; 321 Trices Rd; 327 Trices Rd; 329 Trices Rd; and 42 Hamptons Rd.**
- d. 329 Trices Road – in addition to the above, please address the risk posed by the trotting track, consistent with other PSIs and subsequent DSIs. These tracks are**

*sometimes filled with materials of unknown sources and can be contaminated. As such, the area should be noted in the PSI as requiring a DSI.*

- e. 299 Trices Road – in addition to the above, please provide a risk assessment of the area in the northern part of the site where sheds have been demolished.*
- f. 311 Trices Road – in addition to the above, please:*
  - i. Either confirm that the structure in the northwestern portion is not a sheep dip, or include it in the amended PSI;*
  - ii. Address the risk posed by the trotting track, consistent with other PSIs and subsequent DSIs. These tracks are sometimes filled with materials of unknown sources and can be contaminated. As such, the area should be noted in the PSI as requiring a DSI.; and*
  - iii. Address the risk associated with the southeastern portion of the lot where soil stockpiles and drums of oil were identified. This may be by listing in the PSI that the area requires a DSI.*

**Response:**

**Attachment 5** is a letter from Fraser Thomas addressing points a. to f.

An amended Preliminary Site investigation Report is attached to that letter.

**APPENDIX 9 – SERVICING REPORT**

- 27. Council has constructed a new terminal wastewater pump station located at 612 Springs Road. Please comment on the feasibility for this proposed plan change area to be serviced by a reticulated wastewater system pumping directly to this wastewater pump station. Please contact Murray England Asset Manager Water Services ([murray.england@selwyn.govt.nz](mailto:murray.england@selwyn.govt.nz)) for further information.**

**Response:**

The applicant's servicing expert (E2 Environmental) has advised that, based on the residential zoning yield of approximately 295 lots (including 5 large lot residential lots), they estimate from the SDC Engineering Code of Practice (6.4.4) that the maximum flow generated will be:

Average Sewer Flow ASF  
= 295 lots x 220 L/p/day x 2.7 persons/lot  
= 175,230 L/day or 2.03 L/s

Maximum Sewer Flow MF  
= 2.03 L/s x 2.5 x 2 (peaking factors)  
= 10.1 L/s.

This maximum flow assumes full development of the area with no further infilling possible. The likely position for gravity wastewater pump station is in the south east of the plan change block where all of the site can drain by gravity to a low point. It is likely that a pump station will be on the proposed stormwater utility reserve nearest Hamptons Road.

A rising main would pump wastewater from this location westward along Hamptons Road approximately 1.4km to the intersection of Hamptons and Springs Road and discharge into the SDC gravity sewer network at or near this intersection. This network drains to a new wastewater pump station (WWPS) recently installed at 612 Springs Road (**Figure 2**).



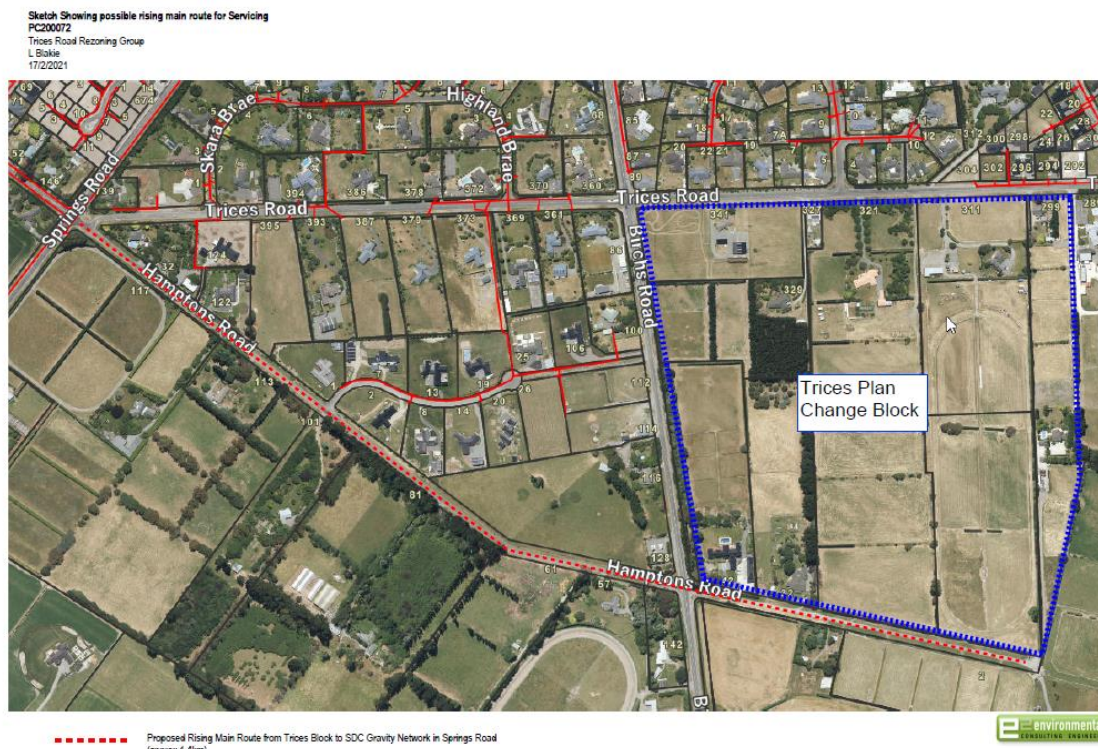


Figure 2: Possible rising main route

E2 Environmental has corresponded with Murray England (Asset Manager Water Services) and Amit Chauhan on wastewater servicing. Amit Chauhan verbally confirmed that there is capacity in the Council's new wastewater pump station for this flow.

Any upgrades to the network between the Springs Road connection point and the pump station will be discussed and agreed during the subdivision consent phase.

**28. The success of the proposed stormwater system relies on an appropriate free outfall clear of obstructions. The proposed stormwater system is likely to rely on a drainage outfall across the Drinnans land, through land owned by Urban Estates until it reaches Tosswill Rd and Drain 22 which is operated and maintained by Environment Canterbury. Please confirm the arrangements (agreements / easements etc.) which will ensure the ongoing and functional drainage path through the above mentioned properties.**

**Response:**

The applicant's servicing expert (E2 Environmental) has advised that the success of the proposed stormwater system at this Site relies on a free outfall clear of obstructions as the drain traverses private land downstream of the Site.

The servicing report included as **Appendix 9** of the application described the plan change catchment that currently flows through the Drinnan's and Urban Estates land. The drainage conveyance through the Drinnan's land is currently achieved by a combination of a paleo-channel formed by the natural concentration of drainage of the land and a farm drain next to the paleo-channel that is assumed to have been installed to direct and control runoff from Hamptons Road. These two features combine/join as runoff discharges off Drinnan's land into the Urban Estates land. From this point the flow is directed into the start of the private drain that ultimately flows under Tosswill Road.

The stormwater proposal for the Plan Change Site continues to utilise this existing drainage. The Trices Road Rezoning Group is intending that the post development runoff is attenuated such that the receiving drain does not experience any additional peak flows or volumes, and hence the maintenance requirements will not increase for the private owners. Similarly, for the private property any risks of blockage on the private drain will pose no greater risk than what is currently experienced.

This discharge meets the case law understanding of Natural Servitude and of maintaining existing flows from upland properties. There is precedence for SDC accepting SMA's that discharge to private drains while maintaining neutrality (i.e. Plan Change 28 Denwood Trustees, Springs Road Lincoln).

Under Plan Change 28 there was an existing private drain that carried runoff from the Site, surrounding farmland and bywash from one of SDC's stock water races. In Plan Change 28 the proposed Stormwater Management Area restricted the future runoff to the same as what occurred prior to the development of the land. The conclusion (as for the Trices Road Site) was that there would be no impact on the private drain's capacity, and that the future discharge would be similar in nature to the existing discharge so that there would be no need to change the ownership [sic.] or management of the private drain. In the Commissioner's decision (Blue Network) the stormwater from Plan Change 28 was permitted to discharge into the private western waterway.

Hence, based on previous approvals we do not see that it is necessary to provide easements during the plan change process particularly as there is no guarantee that the development will proceed to the subdivision consent phase (hence seeking easements would be an unnecessary cost/burden and is not appropriate at this point). That said, the Rezoning Group will continue to consult with the neighbours on the potential to formalise pre-existing stormwater flows across their property with an easement in gross for stormwater.

Discharge consents will be obtained from ECan for the discharge of stormwater to land and/or to water once the conceptual design for the plan change Site has been completed.

#### **APPENDIX 10 – INTEGRATED TRANSPORT ASSESSMENT**

On 18 December 2020 you forwarded an email from Andrew Mazey which set out five points for comment by the applicant. These points were confirmed in your final RFI of 2 February 2021.

The applicant's traffic expert, Novo, has reviewed the comments, most of which are commentary or advisory in nature. An update of the ITA seems unnecessary given the nature of those comments.

**29. The reference on the ODP to an “indicative shared pedestrian/cycle lane on road” is unclear whether you are proposing a separate cycle lane on the carriageway or a separate path within the road reserve. Please provide indicative road cross sections to assist in understanding the difference between on and off road facilities and what you are envisaging.**

**Response:**

**Attachment 6** shows cross sections for a local road and a primary road.

**30. Please provide an updated ITA that incorporates the following comments:**

- a. Section 46 of the ITA acknowledges the upgrade of Hamptons, Birchs and Trices Road frontages which is as expected. Hamptons Road is unsealed apart from the first 50m, so this would need to be sealed as part of the upgrade, along with, for consistency, the frontage of the landscaping/existing houses – this would only be for kerbing and lighting etc. as the Rail Trail pathway is already there.**

**Response:**

Noted. Details can be worked through at subdivision stage.

- b. Council is planning to construct the Springs/Hamptons Rd roundabout in 2024/25. To enable this the Trices Rd leg will be closed off and Trices Rd will become a cul de sac/no exit west of Trices Rd. Council has moved away from the intention signalled in CRETS and the Prebbleton Structure Plan to develop a local orbital route using Hamptons, Trices, etc to Halswell due to the problems in upgrading the route and other “rat running” it would create. The ITA refers to this intention as still current – which it is now not. Hamptons Rd between Shands Rd and Springs Rd will be upgraded only as part of this connection between those two roundabouts/ arterials. The closure of Trices Rd will also reduce the amount of through traffic at the Birchs Rd intersection which will improve safety and/or accommodate the extra traffic from this development.**

**Response:**

Noted. The change in proposal to not develop an orbital route won't fundamentally change the ITA assessment as it used the existing flows along the current route for the basis of predicting future travel directions. It did not rely on this route being upgraded.

- c. The development should upgrade the Birchs/Hamptons Rd intersection to the same safety standard as the Birchs/Trices with median splitter islands etc. to cater for the extra traffic from the Hamptons Road east of Birchs Rd.**

**Response:**

Noted. This can be done at the time of upgrade of Hamptons Road.

- d. As was found with the Flemington subdivision alongside Birchs Rd to south, there can be some resistance to direct lot access/vehicle crossings then crossing the Rail Trail pathway. This has to be balanced with achieving urban form requirements with developments needing to front the road. In addition there is also an established and planted with trees “speed threshold” on the Birchs Rd frontage that will have to be dealt with as part of any frontage upgrades/lots access provisions.**

**Response:**

Noted. This can be addressed at subdivision stage when the lot configuration is confirmed.

Yours sincerely



**RICHARD JOHNSON**

Senior Planner

Attachment 1: An Assessment of Landscape Matters and Visual Assessment (RFI 4, 5, 6, 12, 14, 16).

Attachment 2: Revised ODP (RFI 10).

Attachment 3: ODP Narrative (RFI 10).

Attachment 4: Geotech Letter and Amended Report (RFI 20-25).

Attachment 5: PSI Letter and Amended Report (RFI 26).

Attachment 6: Road Cross sections (RFI 29).