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24 March 2021

Selwyn District Council  
CHRISTCHURCH

Attn. Jocelyn Lewes, Planner & Rachael Carruthers, Planner

By email only: [jocelyn.lewes@selwyn.govt.nz](mailto:jocelyn.lewes@selwyn.govt.nz); [rachael.carruthers.govt.nz](mailto:rachael.carruthers.govt.nz)

Dear Jocelyn and Rachael

**Re: Request for Further Information – Plan Change 76**

In your email of 11 February 2021 you advised that:

*the following information is requested to enable Council to better evaluate the potential effects of the proposal, the ways in which adverse effects may be mitigated and the nature of consultation undertaken.*

In responding to RFI's here the **additional text is shown as underlined and bold** and text to be deleted is shown as ~~strikethrough~~.

***Support for Plan Change and Consultation Outcomes***

- 1. Please provide evidence that the owners of the properties subject to the plan change are party to, or supportive of, the request.***

**Response:**

The applicants confirm that they either own the land subject to the application, or are finalising sale and purchase agreements with entities under the control of the applicants or negotiating purchase as below:

605 East Maddisons Road: The original purchase agreement was signed by Deborah Dunlop as the agent with the name NBPD Group. On the 31st of July it will take possession with the ownership being transferred to Dunford House 2021 Ltd.

617 East Maddisons Road: owned by Dunweavin Limited.

627 East Maddisons Road: the owners in an email 28 February 2021 confirmed: "We support the proposed rezoning in principle, subject to refinements to the ODP". The ODP has been amended since then in consultation with the owners of 627.

**2. Please also document any consultation the applicant may have undertaken with Mahaanui Kurataiao Limited in relation to the plan change request.**

**Response:**

No consultation was undertaken with Mahaanui Kurataiao Limited prior to lodgement, but a copy of the application and the RFI response will be sent requesting any comments which can be addressed ahead of or at any hearing on the plan change.

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

**3. This Plan Change is heavily reliant on the NPS-UD to address the conflict with the Regional Policy Statement, particularly CRPS Objectives 6.2.1 and 6.2.2.5, and their associated policies.**

**4. The request relies on Policy 8 of the NPS-UD, in that it would add significantly to development capacity. In Appendix 10, when responding to this policy, as well as to Policy 6, it is stated that the request will add “an additional 3% over and above existing zoned supply”. Please set out how this percentage figure has been derived.**

**Response:**

Since PC76 was lodged Proposed Change 1 to the RPS has been notified and is to be processed under RMA streamlined procedures. We understand that an independent commissioner is now considering a report on submissions and will report to the Minister. There will not be hearings, so all other things equal, it can be expected that a decision will be issued most likely ahead of the hearing on PC76.

Importantly, Change 1 proposes a Future Development Area at south Rolleston, which includes the PC76 site. It enables urban development in the FDAs where it meets medium term housing capacity needs and supports the Regional Policy Statement pattern of settlement and principles for further growth. In this context whilst PC76 is entirely consistent with and gives effect to the NPS-UD, it is not reliant on it.

The statement ‘an additional 3%’ is imprecise to the extent that the calculation is rounded up and was derived by taking the 2018 census record of all dwellings (occupied, vacant, under construction) in the five statistical areas making up Rolleston and deriving the percentage that 155 lots adds to that 2018 figure ( $155/6164 = 2.52\%$ ). It was intended to give a sense of scale.

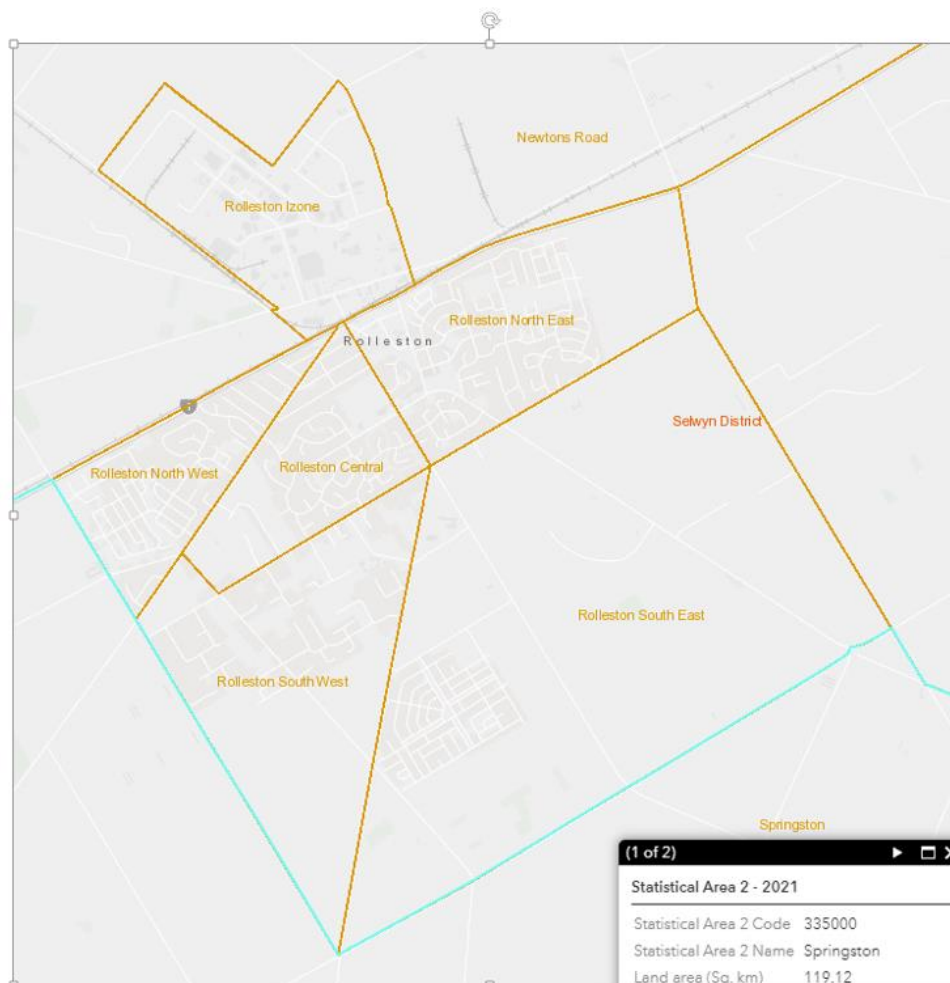
It was not a figure that was derived by assessing the Site’s contribution to available development capacity as reported to the 9 December 2020, Council meeting in the Housing and Business Development Capacity Assessment for the short, medium and long term as that was not available at the time of the plan change application.

The Update data that 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 +2698 lots. The 155 lots in this Plan Change proposal represents an additional 5.7% ( $155/2698$ ) of available capacity for the Greater Christchurch Urban Area within the District 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 the reported Update shortfall of 2737 dwellings in the medium term, the 155 lots in this proposal can provide potentially

5.6% (155/2737) 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 and on-going growth.

#### Statistics NZ: Statistical Areas: Rolleston



***5. There are a significant number of plan change requests currently lodged with Council, most of which propose to provide significantly more capacity than this plan change request. However, in the absence of criteria at this time in the CRPS, guidance<sup>1</sup> from the Ministry for the Environment suggest that factors that can help to determine significant development capacity include significance of scale and location; fulfilling identified demand; timing of development and infrastructure provision (development infrastructure and additional infrastructure).***

***To address the provisions of Policy 8, please provide further analysis that considers the contribution that the proposed plan changes may make to development capacity against the other factors suggested by the Ministry for the Environment.***

#### **Response:**

Noted.

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 76 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.

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.

**6. To address the provisions of Policy 8, please provide further analysis that considers the contribution that the proposed plan changes may make to development capacity against the other factors suggested by Ministry for the Environment.**

**Response:**

MfE factors to determine significant development capacity are assessed here:

MfE Feature	Assessment
<i>Significance of scale and location</i>	<p>The Site is within a Future Development Area shown in Figure 16 of the Our Space Report and Proposed Change 1 CRPS Map A which recognised the imminent shortfall in capacity in the land identified in operative Map A CRPS.</p> <p>The only FDA land in Selwyn is at Rolleston. Plan Change 1 to the CRPS recently notified, confirms the significance of this FDA in addressing housing capacity shortfalls.</p> <p>The Site builds on the southward expansion of Rolleston and ensures a compact, connected urban form with significant growth around the Site.</p>
<i>Fulfilling identified demand</i>	<p>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). That is a very small margin for a three year period when dwelling building consents, albeit for the District as a whole, are at about 1600/year.</p> <p>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.</p> <p>These trends and pressures are reflected in section prices in Rolleston with the \$200,000 level now consistently being exceeded for a standard 550-600m<sup>2</sup> lot.</p> <p>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. If Plan Change 76 were</p>

	<p>approved sooner rather than later it could add significantly (9.5 % or 155/1600) 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.</p> <p>When assessed against the calculated shortfall of - 2737 dwellings in the 10 year medium term, the 155 lots in this proposal account for potentially 5.6% 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.</p>
<i>Timing of development and infrastructure provision</i>	<p>The applicants are proven existing developers of the 200+ lot development at the Twyn Visions Ltd subdivision adjoining to the north.</p> <p>The applicant is able to commence development immediately upon re-zoning being approved; they can contribute to the housing demand very quickly.</p> <p>Discussions with Council have not flagged any major servicing issues (Appendix 3 of the application).</p> <p>There are water and sewer mains within East Maddisons Road reserve; power is available on East Maddisons Road; and telephone is within the Enable supply areas.</p> <p>Stormwater is conventionally discharged to ground in Rolleston but will require ECAN discharge consents.</p>

***7. 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 PC76 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 Rolleston but at the appropriate scales and degrees.

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	<p>The target market is family-based housing with some smaller units to help create a cross-section of community. The proposal is consistent with the type of offerings in the District being a mix of Living Z, and some medium density sited to best advantage within the Site.</p> <p>The proposal continues a successful and popular mix of housing typologies.</p> <p>No high rise, high density housing is proposed as that is more appropriate at the main activity centre at Rolleston if at all in the District.</p>	<p>The proposal will provide homes that are typical of the type of offerings in Greater Chch being a mix of 500-650m<sup>2</sup> lots, some large lots and some medium density.</p> <p>The proposal continues a successful and popular mix of housing typologies.</p> <p>No high rise, high density housing is proposed as that is more appropriate at main activity centres or in support of City Centre rejuvenation.</p>
Variety of sites for businesses	N/A residential only proposal	N/A residential only proposal
Good accessibility by public or active transport	<p>The Site is well-connected to the rest of the District being on arterial roads.</p> <p>There is a Park n Ride public bus facility in Rolleston.</p> <p>Cycling facilities provide travel options to the town centre, town amenities and facilities elsewhere in Rolleston and there is ample scope for recreation/social cycling with new facilities on the southern motorway and existing links to other District towns..</p>	<p>The Site is well-connected to Greater Chch being on arterial roads and easily accessible to key transport corridors newly built from SW Chch.</p> <p>The Park n Ride facility provides direct connections to the centre of Chch at the Bus Exchange providing easy interconnectivity to other locations.</p> <p>The Site is easily accessible to Chch Airport and the rail head at Addington.</p>
Competitive land and development markets	<p>The key growth areas are at Rolleston, Lincoln, West Melton and Prebbleton.</p> <p>An additional developer(s) increases competition both within and between district centres and has proposed development features that distinguish it from other current and known offerings in the land market.</p> <p>The applicants are proven existing developers of the 200+ lot development at the Twyn Visions Ltd subdivision Rolleston, adjoining to the north.</p>	<p>In the Greater Christchurch context, there is already a significant shortage of land in Waimakariri District for the medium (if not short) term and as shown in the current CRPS housing capacity targets (which are in any case out of date). Market feedback is that there is also now a shortage of available sections and developable land in Christchurch City, with Halswell now at capacity.</p> <p>The Site is an attractive development option providing mainstream housing much in demand by families and first home buyers.</p>

	The applicant is able to commence development immediately upon re-zoning being approved; they can contribute to the housing demand very quickly.	Rolleston is growing its self-sufficiency capacity as its population grows and as public investment supports the growth in a co-ordinated way.
Reductions in greenhouse gases	<p>Addressed at paras 63 – 67 of the application.</p> <p>Rolleston is at a scale and with wide range of amenities and facilities that, with the growth in employment opportunities afforded by iZone and the town centre, mean the town is well self-contained minimising the need for travel.</p> <p>The scale of the development (155 lots) means any increase to greenhouse gas emissions across the District is less than minor.</p>	<p>Addressed at paras 63 – 67 of the application.</p> <p>Rolleston is at a scale and with wide range of amenities and facilities that, with the growth in employment opportunities afforded by iZone and the town centre,, 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).</p> <p>The scale of the development (155 lots) means any increase to greenhouse gas emissions across Greater Chch is de minimis.</p>
Resilience to future effects of climate change	<p>Addressed at paras 63 – 67 of the application.</p> <p>The Site is remote from the coast and has a low water table (sea-level rise and storm surge), from major rivers (flood channel outbreaks) and its dwellings will manage extreme weather events (heat, wind) by compliance with building Code requirements for its buildings.</p>	<p>Addressed at paras 63 – 67 of the application.</p> <p>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 effects being an inland site, remote from major rivers. As an urban area the development will manage extreme weather events (heat, wind) by compliance with building Code requirements for its buildings.</p>

#### Scope of Plan Change

**8. In Appendix 9, in response to UD-P13, it is stated that the proposal is inconsistent with Map A of Chapter 6 [of the RPS] “but is consistent with the approach of the NPS-UD for significant development capacity if it is added to the adjoining Plan Change 70”. This plan change request, as well as that of PC70, are currently being considered separately, as individual requests. Please advise if there is any intention that the two plan changes be combined into one or consider revising this statement.**

#### Response:

The applicants do not intend to combine Plan Change 70 and 76.

However in assessing plan change requests, even if they are assessed individually and sequentially, the Council has to be mindful of the scope and scale of what is proposed in all plan changes and the statutory status of such at each assessment.

#### **Infrastructure**

**9. As previously mentioned, there are a significant number of plan change requests currently lodged with Council, and consideration is required to be given to the position of key movement linkages and reserves between this plan change, the existing environment and other plan change requests. Details of other plan changes can be found on Council's website.**

#### **Reserves**

**10. The plan change request has been reviewed by Council's Manager – Open Space and Property.**

**11. The ODP shows a single recreation reserve at the northern end of the development area and the request documents mention "creating a landscape feature for the development by creating a neighbourhood park". However, it does not appear that consideration has been given to the provisions of open space in the surrounding area, including the location of an existing reserve on Chris Drive to the north. The proposed location exceeds the Council's distribution criteria of 500m and, as such, the location of the proposed reserve as shown on the ODP is not supported. However, a neighbourhood reserve (of around 2,000 m<sup>2</sup>) is desirable in this area, but this should be more centrally located and ideally be next to medium density areas. Given this, please either:**  
**a. provide an assessment as to why this location was chosen or the rationale for its need and position; or**  
**b. amend the application as per the above comment.**

#### **Response:**

**Attachment 1** is an amended ODP. The neighbourhood reserve has been repositioned in a more central location within the ODP area. See also **Attachment 2** Landscape Matters and Visual Assessment, 'Future developments and anticipated changes in the receiving environment' (pp 10-12). Provision has been made for local road links to the existing adjoining urban areas (ODP Area 12 to the north and ODP Area 10 to the east), a roading link to connect with the proposed Plan Change 70 road layout to the south (known as Faringdon Far West) and a future possible link to the Future Development Area land to the west, currently zoned Rural Inner Plains. These road links will all be local roads and suitable for on road pedestrian and cycle routes. In addition, two cycle and pedestrian links from within the proposed subdivision onto East Maddisons Road are proposed, as shown on the ODP.

**12. Please also provide a landscape assessment incorporating an open space assessment.**

#### **Response:**

**Attachment 2** is a Landscape Matters and Visual Assessment.

#### **Transport**

**13. The Integrated Transport Assessment provided with the plan change request was reviewed by Council's Asset Manager – Transportation.**

**14. Please provide a network safety assessment and specific traffic/SIDRA analysis associated with the existing East Maddisons/Goulds Road intersection. An upgrade of this intersection, to a future roundabout, is planned for 2029/30 which should then coincide or**



*thereabouts with the extension of Shillingford Blvd (CRETS Collector Rd) through to Dunns Crossing Rd. Therefore, while the current intersection arrangement may be sustainable if development proceeds ahead of the proposed upgrade, any assessment should include cumulative effects.*

**Response:**

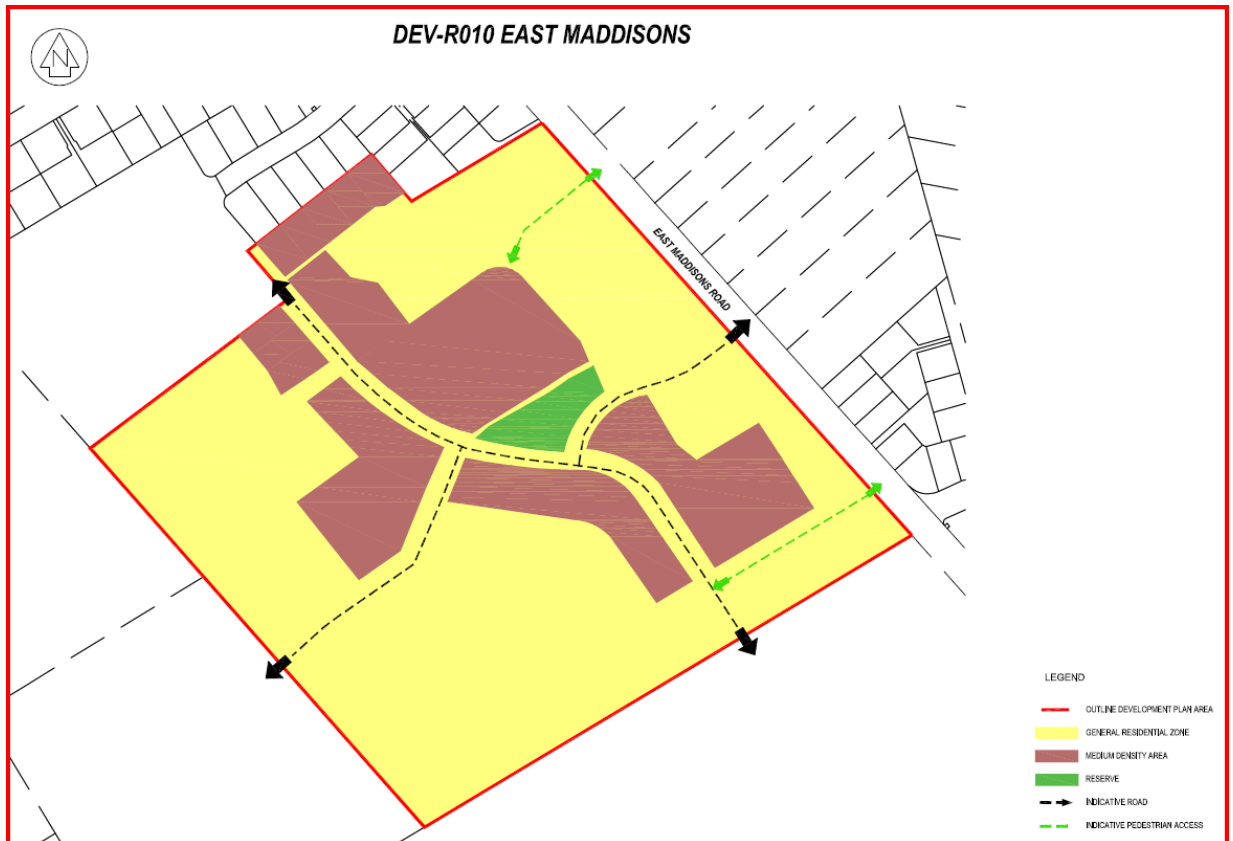
**Attachment 3** is an Integrated Traffic Assessment including a network safety assessment and specific traffic/SIDRA analysis. This includes consideration of the cumulative effects of PC76 and adjoining PC70 (see paras 37-39). Prior to the Shillingford Boulevard extension and roundabout, traffic to the southwest and southeast would likely travel along East Maddisons Road to the T intersection with Goulds Road. Modelling at this intersection, including with PC70 traffic, shows that the intersection continues to operate at good levels of service (LOS A or B).

*15. While the proposed ODP appears to be reasonable based on the main roading connections on their own, there are concerns in relation to how the local network and further connections to East Maddisons Road will practically work. In the proposed subdivision layout included in the request, a road/intersection (which appears to have the same status as the main ODP roads) is positioned too close to the realigned section of East Maddisons Road/Goulds Rd Intersection, as shown below. Please revise the ODP to avoid this type of outcome at any subsequent subdivision consent stage.*



**Response:**

**Attachment 1** is an amended ODP which shows the principal roads only, with a main indirect east-west road, connecting onto East Maddisons Road in a central position within the subdivision as below.



**16. Please review the ODP to address walking and cycling connections through the area.**

**Response:**

**Attachment 1** is an amended ODP. The principal roads shown on the ODP are all local roads, suitable for onroad cycleways. Pedestrian connectivity to East Maddisons Road with two connections at the northern and southern ends of the Site.

**17. A review of the Yellow line timetable would indicate that it takes upwards of an hour to make the journey from Rolleston to the bus interchange in the centre of the city, and longer to make the trip from the City to Rolleston. Similarly, the timetable for the 85 Rolleston direct service, which runs three times a day, takes between 45 and 50 minutes to make the trip in and out of the City. Please provide evidence to support the assertion in paragraphs 30 and 67 that the standard bus trip between Rolleston and the City takes 37 minutes, and the express takes 30 minutes.**

**Response:**

The travel times were possibly for car travel. Car travel may be quicker with the Southern Motorway now in place.

The times in the application have been confirmed as not reflecting the Metro bus timetables, and as advised by RFI 17 the travel times are around an hour. The differences in travel times are not significant enough to have a bearing on the potential use of public transport for accessing the City. Not all users will need to travel to the heart of the City.

This is a detail that does not affect the merits of the proposal.

**18. The road design criteria referred to in Section 4.1.2 Table 1 of the infrastructure report (included at Appendix 3 of the request documents) is inconsistent with the standards set out in Appendix E13 of the Operative District Plan. Given this, please either:**

- a. provide an assessment of this variance in terms of its effect on plan integrity in terms of different road design standards; or*
- b. amend the application to be consistent with the Operative District Plan provisions.*

**Response:**

See revised Infrastructure Report (**Attachment 8**). The proposed roading will comply with the Appendix E13 standards.

**Water**

**19. The Infrastructure Assessment provided with the application was reviewed by Council's Asset Manager – Water Services.**

**Note:**

*i. The proposed Plan Change area is bounded by undeveloped land. Wastewater pipelines may need to be installed at greater depth and size to service areas outside the proposed Plan Change area. Developer lead infrastructure may be required under an Infrastructure cost share agreement. Please confirm that this is a viable option should it be required.*

**Response:**

The applicant accepts that either a developer lead infrastructure may be necessary for wastewater or by an infrastructure cost share agreement to be determined at subdivision stage.

**Urban Design**

**20. The plan change has been reviewed by Council's Senior Urban Designer and it is requested that an urban design and landscaping statement be supplied which provides a contextual analysis of the site, its characteristics and its surrounds, including consideration of the constraints and opportunities of the wider area.**

**Response:**

**Attachment 2** is a Landscape Matters and Visual Assessment.

**21. Please clarify how the request will provide "affordable housing, which is currently undersupplied", as stated at paragraph 3(g).**

**Response:**

The cost of new houses is significantly determined in a greenfield situation and where significant new growth is occurring, as is the case for Rolleston, by availability of serviced and subdivided land, section prices which are influenced in an upwards direction by supply and demand for various lot sizes, and the scale or nature of the new build.

The applicants are experienced developers. They are very supportive of the 12hh/ha density standard which helps drive smaller lots for a development which must also provide utilities, reserves, cycle and pedestrian facilities etc.

They have focussed on providing a large number of their developed lots to first home buyers, especially those using Kiwi Saver funds as capital. These buyers are overwhelmingly looking for a stand-alone house with as much outdoor space as they can afford. For these buyers intensive/comprehensive housing is not an attractive option.

They are firmly of the view that they can place lots on the market quicker for medium density developments (430 – 500m<sup>2</sup> lots) to enable the building of smaller, and therefore lower cost, single storey homes with three bedrooms, and single garage. The applicant is aiming to achieve KiwiBuild standards for medium density areas; this is available to new

owners. They will not provide for two-storey developments as they are not seen as cost competitive compared to single storey/small lot development.

All these measures drive towards more affordable housing. Affordable is not the same as social housing.

There is evidence that section prices in Rolleston are rapidly increasing in price with what was a ceiling of \$200,000 now being broken for most Living Z lots. That is the initial and upfront cost for new homeowners in addition to which is the build cost and that cost is also on an upwards trend.

Ross Mitchell of Harcourts, Lincoln advised on 12 March 2021 that:

*The sale this past week by Harcourts of 3 sections in Lowes Rd has reinforced the dilemma that first home buyers are going to be placed in where 3 sections of 610 m<sup>2</sup> sold for between \$266 - \$275,000. Albeit the section supply in Rolleston is severely restricted at present, particularly ones with titles as these did. As such, I feel that the sales figures currently being achieved will be reflective of the current tight supply with no real relief in sight until some of the Private Plan Changes are consented and available.*

*Never the less, the development costs of sections has not reduced and with basic building costs now around \$2,000 per m<sup>2</sup>, the \$550,000 cap on the home start loan is going to put real pressure on first home buyers. To this end, the past offerings of Dunweavin 2020 Ltd and their previous entity Twyn Visions Ltd, has always ensured that first home buyers were catered for and usually given priority over group buyers and investors. The 450 – 550 m<sup>2</sup> sections play an integral part in this process as does the first home buyers desire to be in a smaller family friendly subdivision rather than the larger semi housing estate offerings found in other parts of Rolleston.*

#### **Mahaanui Iwi Management Plan**

**22. At paragraph 166, the request states that “the plan change seeks to include landscaping within the reserves, and in road corridors adding to the overall biodiversity of the Canterbury Plains consistent with Chapter 5.5 of the MIMP”. Please identify if the existing framework within the Operative District Plan is sufficient to achieve the statement above.**

#### **Response:**

The Operative District Plan has a number of Objectives and Policies that direct appropriate proposals from developers with respect to landscaping and contributing to biodiversity, and which enable the Council to negotiate biodiversity outcomes consistent with the MIMP. These include:

##### *Policy B3.4.33*

*Encourage people who are developing or redeveloping sites in townships to retain trees, bush or other natural features on the site, as part of the new development.*

##### *Policy B4.1.11*

*Encourage new residential areas to be designed to maintain or enhance the aesthetic values of the township, including (but not limited to):*

- *Retaining existing trees, bush, or other natural features on sites; and*
- *Landscaping public places.*

#### *Objective B4.2.3*

*The maintenance and enhancement of amenities of the existing natural and built environment through subdivision design and layout.*

#### *Policy B4.2.4*

*Encourage the retention of natural, cultural, historic and other features within a subdivision and for allotment boundaries to follow natural or physical features, where it maintains the amenity of an area.*

#### *Policy B4.1.13*

*To ensure that development in Medium Density areas identified in an Outline Development Plan provides a high quality living environment and achieves a good level of urban design, appearance and amenity. Relevant urban design considerations include:*

- *That opportunities for landscaping and tree planting is provided, commensurate with a medium density living environment;*

#### **APPENDIX 23**

##### **SUBDIVISION DESIGN GUIDELINES FOR ROLLESTON**

*Landscape planting to maintain a consistency through the use of strong native planting in all stormwater areas and utility areas and street trees to be over 6 metres in height, at maturity, so as to produce a neighbourhood scale, appropriate shading and traffic calming*

The existing framework within the Operative District Plan is sufficient to achieve the statement above.

Additionally the applicant has commissioned a Landscape Matters and Visual Assessment (**Attachment 2**) which establishes the base position for the development in regard to those matters.

**23. At paragraph 168, the request states that “the plan change has been designed taking into consideration the potential effects of resultant subdivision and development on the rivers and streams that flow into Te Waihora/Lake Ellesmere.”. Please identify if the existing framework within the Operative District Plan is sufficient to achieve the statement above.**

#### **Response:**

The existing framework within the Operative District Plan is sufficient to achieve the statement above.

The development will be fully reticulated to standards set out in the Operative District Plan. Additionally the Restricted Discretionary Activities for subdivision for water, and effluent disposal require reticulated services.

#### **Operative District Plan**

**24. Please consider if it is appropriate that Policy B4.3.9, which specifically references the number of Living Z areas within Rolleston, and Policies B4.3.63 and B4.3.77, which identify the specific matters relevant to each ODP area, be amended to reflect the plan change request. If so, please provide text for inclusion in the Operative District Plan.**

#### **Response:**

Policy B4.3.9 will require amendment if any of the proposed Plan Changes presently lodged are adopted by the Council. It is possibly appropriate to identify the need for the change but leave the number as unspecified pending Council decisions.

Amend Policy B4.3.9 as follows

*In Rolleston ~~xx~~ Living Z areas have been identified, and an Outline Development Plan for ~~xx~~ of these areas has been incorporated into the District Plan.*

Policy B4.3.63 relates to Lincoln Township.

Policy B4.3.77 should be amended as follows:

Add new text to Policy B4.3.77

Policy B4.3.77

Ensure that development within each of the Outline Development Plan areas identified on the Planning Maps and Appendices within Rolleston addresses the specific matters relevant to each ODP Area number listed below:

**Outline Development Plan Area xx (East Maddisons)**

- **ODP Area xx to align with ODP Areas 10 and 12;**
- **Provision of a direct north-south primary road connection from Brenley Drive (ODP Area 12) to ODP Area xx;**
- **Provision of an east-west indirect road connection from East Maddisons Road to ODP Area 10;**
- **Provision of a mix of low and medium density housing areas with a minimum net density of 12 households per hectare averaged over the ODP area.**
- **Provision of pedestrian and cycle links within and through the ODP area to connect to adjoining urban areas;**
- **Provision of a comprehensive stormwater system that has sufficient capacity for the ODP area;**
- **Provision of reticulated water supply and wastewater systems that have sufficient capacity for the ODP area;**
- **Provision of a neighbourhood park.**

***25. At paragraph 50 it is stated that there will be no hazardous installations. Is this proposed to be managed by existing rules within the District Plan, or are specific provisions required to support this statement?***

**Response:**

Yes. Hazardous installations are proposed to be managed by existing rules within the District Plan.

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 similar hazardous substances.

**26. Please confirm that the plan change seeks to adopt the existing Living Z (Rolleston) sizes set out in Table C12.1 in the Operative District Plan.**

**Note:**

**ii. Through the Proposed District Plan process, Council is seeking to establish a consistent ODP design with an approach to minimise features on an ODP and utilise assessment considerations in supporting text. While this is a request to change the Operative District Plan, please be aware that alignment of the ODP design may be sought as this request progresses.**

**Response:**

The intention is to adopt the existing LZ (Rolleston) standards. The minimum permitted density in the Operative District Plan is 10 hh/ha. This a minimum, and PC76 will exceed it with a minimum density of 12 hh/ha.

#### **Geotechnical Assessment**

**27. The Geotechnical Assessment provided with the plan change request was peer reviewed on behalf of Council by Ian McCahon of Geotech Consulting Limited and this is attached for your information.**

**Response:**

Noted.

**28. It is requested that, in order to provide a better basis for accepting the geotechnical suitability of the site for the purpose of the plan change, the following is requested:**

- **provide data of the well logs (the well reference number and location relative to the site) used to verify the shallow gravel found in the site tests is continuous for many metres.**
- **confirmation that the equivalent Foundation Technical Category is TC1.**
- **An outline of whether any hazards identified in s106 of the RMA are present or not and, if they are, how they may be mitigated.**

**Response:**

**Attachment 4** addresses the three matters in RFI 28.

**29. At paragraph 56, please clarify which recommendations, from which report, are being referred to. Please advise if any recommendation requires specific measure to be incorporated into the District Plan to support those recommendations.**

**Response:**

**Attachment 4** addresses the three matters in RFI 29.

#### **Preliminary Site Investigation (PSI) Report**

**30. The PSI report provided with the plan change request was peer reviewed on behalf of Council by Environment Canterbury.**

**31. The PSI indicates that the various properties are, or have been, used for keeping horses and the photographs appear to show a horse training arena on Lot 2 DP 74311, as well as one possibly also on Lot 3 DP 74311. However the PSI has not discussed the material used**

***to line the horse training arena/s. As areas are occasionally lined with ash or material of unknown origins, please provide an amendment to the PSI that addresses this matter.***

**Note:**

***iii. Should the plan change request be approved, a Detailed Site Investigation (DSI) will be required over all the identified HAIL areas of the site. If the DSI identifies contamination that exceeds the soil contaminant standards for residential use, then a Remedial Action Plan will be required, remedial works will be required to be undertaken as per the plan, and a Site Validation Report will be required to be submitted to council confirming that the site is suitable for residential use.***

**Response:**

**Attachment 5** addresses RFI 31.

The applicant has always proceeded on the understanding that should the plan change request be approved, a Detailed Site Investigation (DSI) will be required over all the identified HAIL areas of the site.

### **Section 32 Assessment**

***32. Please review the statement in relation to a cost of Option 3 is that it would contribute some commuter traffic from a portion of the anticipated 155 households as a yield of this nature is inconsistent with the Living 3 zoning option proposed by Option 3.***

**Response:**

The number of lots is an error. The Site may yield about 25 x 5000m<sup>2</sup> Living 3 zone lots.

All development options for residential purposes for the Site have the potential to generate commuter traffic from those households that work either in Rolleston or outside Rolleston. It is a matter of degree; a portion of 155 households under Living Z will commute, as will a proportion of the, say, 25 households in a Living 3 Zone.

Fewer lots under Living 3 will mean, all things being equal, that commuter traffic volumes will be less in a Living 3 zone than Living Z, but there should be some commuter traffic.

***33. Please clarify the statement in relation to a benefit of Option 2, being rezoning the whole site to Living Z, would provide for a “greater choice in typology than currently available”.***

**Response:**

This statement is inaccurate. The applicants propose to provide standard Living Z lots that will likely be developed with conventional single storey detached dwellings complemented by an area of medium density housing. The Rolleston housing market has strongly supported a limited range of dwelling types as the town is attractive to young families and first home buyers. The development will be aimed at achieving KiwiBuild standards for medium density areas so these are available to first time home owners.

As such the Plan Change Site will complement existing housing typologies available in Rolleston.

***34. Please clarify how the following are ‘benefits’ to Option 3, being rezoning to Living 3 – it being “consistent with the Future Development Area status under Our Space Greater Christchurch Settlement Update but not the current RPS” and “ODP provides overall plan of integrated land development for smaller site”.***



**Response:**

As part of a proposed FDA the Site has strategic land use advantages in being identified for future urban development. It forms part of a bigger picture of long term growth of Rolleston. Changing the zoning gives effect to the FDA status. The greatest return on that FDA status is Living Z; some yield is possible under Living 3 (25 lots cf 155 lots) so there is some, but a lesser benefit as Living 3.

Plan Change 1 to the CRPS has recently been publicly notified (after the Plan Change application was lodged) and it has the effect of “freeing up” this FDA land for urban development purposes by changing its status to a Development Area. That further enhances it’s status as a Site that carries with it planning benefits.

The Site is not smaller, it is the scale of the development that is smaller under Living 3. Even as a Living 3 development it would benefit from an ODP to ensure roading connections and other walking/cycling links were provided for and integrated with nearby development. That is a benefit.

***35. Please identify any risks of acting or not acting in relation to the plan change area specifically, rather than more broadly in terms of the wider township.***

**Response:**

Add new text as follows:

The Plan Change Site is held in three titles and used as three lifestyle blocks. It represents a low intensity/low return use of the land. The growth of Rolleston to the SW has increasingly got closer to the Site, and urban development is now hard on the Site’s northern boundary. Residential development opposite the Site to the NE across East Maddisons Road also acts to block in the Site.

The risk of not acting and not re-zoning the Site is that it will, all things being equal with both the planned adjoining ODP developments, and the proposed Plan Changes recently lodged with the Council, become an isolated rural Site out of keeping with the nature, scale and character of adjoining residential development. There is a risk of cross boundary issues arising (reverse sensitivity depending on the uses on respective sides of the urban boundary) with permitted rural zone activities being potentially incompatible with urban land uses.

A risk arising from not re-zoning the Site, and enabling residential development surrounding it, is future difficulties in providing for integrated servicing and effective, time responsive responses to co-ordinating servicing, provision of transport networks, reserves and efficient circulation within SW Rolleston.

A planning risk in not acting to confirm the re-zoning of the Site lies in a potential inconsistency with the following Operative Plan Objectives and Policies: for subdivision and Urban Growth:

**Objective B4.2.3**

The maintenance and enhancement of amenities of the existing natural and built environment through subdivision design and layout.

**Objective B4.2.4**

That subdivision provides for variety and efficiency in its design, form and function.

**Objective B4.3.4**

New areas for residential or business development support the timely, efficient and integrated provision of infrastructure, including appropriate transport and movement networks through a coordinated and phased development approach.

**Policy B4.3.3**

Avoid zoning patterns that leave land zoned Rural surrounded on three or more boundaries with land zoned Living or Business.

**Policy B4.3.6**

Encourage townships to expand in a compact shape where practical.

**Policy B4.3.75**

Encourage integration between rezoning land for new residential development at Rolleston and associated provisions for utilities, community facilities and areas for business development.

**Amendments to Request Documents**

**36. Please amend the request documents as follows:**

(New text **bold/underlined**; deleted text ~~striketrough~~)

**a. ensure that the correct title references are shown in Table 1;**

**Table 1**

<b>Registered Owner</b>	<b>Address</b>	<b>Appellation Title</b>	<b>Area (ha)</b>
Louise Marie Wilkinson (purchaser Dunford House Ltd settles on 30/7/21)	605 East Maddisons Road	Lot 1 DP 26880	4.047 ha
Angelene Lorna Holton (purchaser Dunweavin 2020 Ltd settles on 1/10/21)	617 East Maddisons Road	Lot 3 DP 74311	4.065 ha
Michael Paul & Hayley Marie Moynihan	627 East Maddisons Road	Lot 1 DP 74311	4.857 ha
<b>TOTAL</b>			<b>12.969 ha</b>

**b. amend the signature block on page 2 from Trices Road Rezoning Group to Dunweavin 2020 Ltd;**

**Response:**

See **Attachment 6**.

**c. provide titles for all properties included in the plan change request;**

**Response:**

See **Attachment 7**.

**d. amend Figure 2 to correctly reference other private plan changes currently before Council;**

**Response:**

Figure 2 was accurate at the time of lodgement. See **Attachment 9** for revised zoning map showing all proposed private plan changes lodged to date.

*e. amend paragraph 10 to remove reference to Living 3 as this is not part of the request;*

**Response:**

Amend paragraph 19 as follows:

11. The proposal is to rezone a 12.969 ha block held in three ownerships as detailed above from Rural Inner Plains to Living Z and ~~Living 3~~.

*f. amend paragraphs 20 and 24, and elsewhere as required, to ensure that the request reflects the nomenclature used in the Operative District Plan, rather than the Proposed District Plan;*

**Response:**

Amend paragraph 20 and 24 as follows:

20. An issue of coherent urban form will arise if Plan Change 70 and 73 are adopted and the East Maddisons Plan Change Site is left zoned Rural Inner Plains. There is a prospect, if Plan Change 70 and 73 are adopted, that the Site will become an isolated island of ~~General Rural~~ **Rural Inner Plains** land surrounded on most sides by Living Z land **(Figure 2)**.
24. The Site will support a variety of residential building typologies and this will contribute to a mix of households within the development and provide built form variety and interest in the streetscape. To achieve the proposed minimum density of 12 households per ha some medium density housing will be required, as provided for under the ~~General Residential~~ **Living Z** rules (small site development and/or comprehensive development). This medium density housing is proposed to be located central to the Site, not on its boundaries thereby reducing the potential for adverse off-site effects.

*g. correct the reference to Living 3 at paragraph 68 to reflect the current zoning of the site;*

**Response:**

The paragraph is correct as written. It is simply comparing two forms and densities of residential development, Living Z and Living 3. It does not have to reference the current zoning which is Inner Plains Rural which will not have residential development.

68. The plan change will provide for the continued growth of Rolleston by managing the development through an ODP **(Appendix 1)**. The plan change will yield significantly more lots as Living Z than Living 3 and provide a supply buffer to on-going high level demand for lots in Rolleston. The Plan Change is anticipating a form of development that is a much more efficient use of a prime site supporting a well-functioning urban area. It is a positive endorsement of Rolleston as a growth node in the District.

***h. correct the reference to Figure 7 in paragraph 69 – the preceding text references the Our Space, however the reference points to the Rolleston Structure Plan;***

**Response:**

Amend paragraph 20 and 24 as follows:

69. The plan change is consistent with the signal provided by Fig 16 of the Our Space Report which showed this area of SW Rolleston as a Future Development Area ~~(Figure 7).~~ **(Figure 6).**

***i. consider the relevance of paragraph 135 to this plan change request;***

**Response:**

Paragraph 135 states:

135. With respect to Selwyn, the FDA land is at Rolleston only. Highly desirable locations such as Rolleston, where there is very strong demand for further housing, is unable to contribute to meeting that demand due to restrictive provisions of the CRPS.

**Response:**

The paragraph is very relevant to this Plan Change request as it is pointing out that, notwithstanding the Site is within a FDA identified in a non-statutory document that signals a longer term intention of provision of future land for urban development, and notwithstanding the FDAs were agreed by the Greater Christchurch Councils, the Site incurs planning hurdles through inconsistency with Map 6 of the CRPS. It is not land identified in the operative CRPS as a FDA suitable for future urban growth.

Since lodgement of PC76, Proposed Change 1 to the CRPS has been notified. This amends Map A to show FDAs, including this Site at South Rolleston.

***j. correct the reference in paragraph 152 that the plan change is not within an Urban Growth Overlay within the Proposed District Plan;***

**Response:**

Amend paragraph 152 as follows:

152. That assessment shows that the plan change is entirely consistent with the relevant objectives and policies. With respect to urban growth, the plan change is not consistent with UG-P3 because the Site is not within an Urban Growth Overlay.

***k. renumber the paragraphs referring to the Rolleston Structure Plan (paragraphs 129-134) as they are out of sequence with the proceeding and following paragraphs;***


**Response:**

The revised application addresses this paragraph numbering issue.

***l. in Appendix 6, in response to Objectives 5.3.7 and 6.2.2, correct the street name - Maddisons Road and East Maddisons Road are two different locations in Selwyn;***

**Response:**

Amend Appendix 6 as follows:

<p><b>1.3.7 Strategic land transport network and arterial roads (Entire Region)</b></p> <p>In relation to strategic land transport network and arterial roads, the avoidance of development which:</p> <ol style="list-style-type: none"><li>1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and</li><li>2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements</li></ol>	<p>The Infrastructure report and ODP sets out the roading proposals for the Site and how interconnecting roads ensure linkages to adjoining and future development area.</p> <p>The Report notes the need to upgrade East Maddisons Road frontage to urban standards including provision of footpaths and cycle lanes.</p> <p>The proposal should give rise to no traffic safety issues with only one access point to East Maddisons Road.</p> <p>The traffic effect of the proposed 155 lot development is considered to be less than minor and is not of a scale with regional significance.</p> <p>The rezoning will be consistent with Objective 5.3.7.</p>
<p><b>6.2.2 Urban form and settlement pattern</b></p> <p><i>The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:</i></p> <ol style="list-style-type: none"><li>1. <i>aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:</i><ol style="list-style-type: none"><li>a. 35% averaged over the period between 2013 and 2016</li><li>b. 45% averaged over the period between 2016 to 2021</li><li>c. 55% averaged over the period between 2022 and 2028;</li></ol></li><li>2. <i>providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and in greenfield priority areas and brownfield sites;</i></li><li>3. <i>reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;</i></li><li>4. <i>providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;</i></li><li>5. <i>encouraging sustainable and self-sufficient growth of the towns of Rangiora,</i></li></ol>	<p>The Site forms a logical extension to Rolleston and will provide a compact and consolidated urban form for the town, linking to the existing and planned urban area. The Site is not an isolated pocket sitting in a rural setting.</p> <p>The OSDP identifies and provides for 12 ODP areas at Rolleston. The Site is not within an adopted ODP site. The two nearest are ODP 10 and ODP 12 that cradle this Site to the NW and NE (Site outlined in red).</p>  <p><b>Appendix 38 OSDP</b></p> <p>The Proposed Selwyn District Plan identifies eight development areas to cater for known and future urban growth (these are existing Map A greenfield priority areas) so to that extent the Site is unplanned but is consistent with the Policy intent of the NPS-UD 2020 Policy 8 where Councils are expected to be responsive to plan change requests that would contribute to well-functioning urban environments and supply significant additional capacity (the proposed rezoning will contribute an additional appx.3% of lots over and above the feasible yield of existing zoned areas at Rolleston).</p> <p>Additional capacity to match the needs for housing over the 10 year life of the District Plan will provide a necessary foundation to enable future growth. The <b>East</b> Maddisons Road proposal will better enable the intent of subclause 5 of the Policy in encouraging sustainable and self-sufficient growth of Rolleston.</p>

<p><i>Kaiapoi, Woodend, Lincoln, Rolleston and Rolleston and consolidation of the existing settlement of West Melton;</i></p> <p>6. <i>N/A Rural Residential</i></p> <p>7. <i>N/A Maori Reserves</i></p>	<p>The Site will meet a minimum density of 12 households per ha which is higher than the existing dwelling density at Rolleston (10 hh/ha for LZ areas and less for other existing urban areas). The development will include medium density housing and will contribute to the range of housing types at Rolleston.</p> <p>The Council has confirmed that there is infrastructure capacity to service the proposal at urban residential standards.</p>
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***m. in Appendix 7, in response to Objective 3.23, clarify the contradiction between the first and second sentences with regard to the quality of soils within the plan change area;***

**Response:**

Amend Appendix 7 as follows:

<p>3.23</p> <p>Soils are healthy and productive, and human-induced erosion and contamination are minimised.</p>	<p>Much of the Site presently is not used for primary production. <del>notwithstanding the quality soils on site.</del></p> <p>The soils are not Class 1-3. <b><u>The Site contains Lismore stony and shallow silt loam soils. These soils have limited ability to retain moisture and are considered to have severe limitation for food production even with irrigation.</u></b></p> <p>The Plan Change proposes a fundamental shift in land use from low intensity lifestyle activities, to full urban development supplemented by some reserves. The soil resources will be lost to primary production, but the land conversion involves no major sources of contamination.</p> <p>A PSI study highlighted small and isolated spots of potential contamination that require DSI to determine the exact nature of any contamination and to recommend any remediation necessary.</p>
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***n. in Appendix 8:***

***i. consider the appropriateness of including reference to the Proposed District Plan on page 6 when responding to the assessment of the plan change request against the provisions of the Operative District Plan;***

**Response:**

The reference to the Proposed District Plan is appropriate given that that plan has been publicly notified and, albeit it is at an early stage of its statutory processing, it is a relevant statutory document for consideration by this Plan Change. The reference simply makes reference to a statutory proposal to increase dwelling densities in the General Residential Zone in the PDP.

As such it provides assurance that in the timeframes associated with land development (6 months - -5 years) the Plan Change has “future-proofed” the proposal. It looks forward to what sort of urban development best meets the needs of Rolleston, rather than just adopting a density standard that served a previous planning outcome.

It aligns with the new district planning standards so that the proposal properly responds to the on-going pressure for higher lot yields in “suburban” development at the time that the land will be subdivided in perhaps 6 months -5 years should the Plan Change be adopted. The reference is also appropriate in that it provides a rationale for proposing a density higher than presently provided by the Living Z zone in the Operative District Plan.

*ii. provide an assessment of the request against the policies for Rolleston, rather than Prebbleton;*

**Response:**

Amend Appendix 8 as follows:

<p><b>ROLLESTON</b></p> <p><del>Policy B4.3.64</del> Encourage land located to the east and west of the existing Living and Business zones, being those Living and Business zones that adjoin Springs Road, which is located as close as possible to the existing township centre as the first preferred areas to be rezoned for new residential development at Rolleston, provided sites are available and appropriate for the proposed activity.</p> <p><del>Policy B4.3.65</del> Discourage further expansion of Rolleston township north or south of the existing Living zone boundaries adjoining Springs Road.</p> <p><u>Policy B4.3.71</u> <u>Avoid rezoning land for new residential or business development (other than Business 2 and 2A Zoning), west of SH1 and the South Island Main Trunk Line (SIMTL).</u></p> <p><u>Policy B4.3.72</u> <u>Avoid rezoning land for new residential development in areas shown under the Airport Flightpath Noise Contours for 50 dBA Ldn or greater, on Planning Map 013.</u></p> <p><u>Policy B4.3.75</u> <u>Encourage integration between rezoning land for new residential development at Rolleston and associated provisions for utilities, community facilities and areas for business development.</u></p> <p><u>Policy B4.3.77</u> <u>Ensure that development within each of the Outline Development Plan areas identified on the Planning Maps and Appendices within Rolleston addresses the specific matters relevant to each ODP Area number listed below:</u></p>	<p>The Site is opposite the existing LZ zones on the east side of East Maddisons Road and to the north of the Site. It's location is consistent with the preferred growth direction in Policies <del>B4.3.64-65</del>, <u>B4.3.71 – 77.</u></p> <p><u>The Site is not west of SH1 and the SIMTL.</u></p> <p><u>The Site is not under the Airport Flightpath Noise Contours.</u></p> <p><u>The proposed Plan Change has been discussed with Council staff with a view, among other things, to ensure that the Site through the ODP and servicing proposals will provide for appropriate integration between the proposed new residential development and associated provision of utilities, community facilities and areas for business development. Advice is that utilities are available and with capacity to service the Site with many services in East Maddisons Road. There is good provision of major Council reserves at Foster Park and the planned District Park to the south of Levi Road to meet the active recreation needs of households living on the Site.</u> <u>The Council has advised that a neighbourhood reserve (of around 2,000 m<sup>2</sup>) is desirable in this area, but this should be more centrally located and ideally be next to medium density areas.</u> <u>The proposal has adopted this advice and been amended accordingly, including a revised ODP.</u></p> <p><u>The development will be controlled by an ODP and the specific design matters relevant to that ODP (see RFI 24).</u></p>
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***o. in Appendix 9, in response to UG-P13, amend as appropriate the reference to DEV-PR3;***

**Response:**

Amend Appendix 9 as follows:

<p><b>Development Capacity</b>  <b>UG-P13 Residential growth – Greater Christchurch area</b>  Any new residential growth area within the Greater Christchurch area shall only occur where:</p> <ol style="list-style-type: none"> <li>1. Extensions assist in meeting the housing bottom lines (minimum housing targets) of 8,600 households over the medium-term period through to 2028.</li> <li>2. A HDCA and FDS identify a need for additional feasible development capacity for the township and the additional residential land supports the rebuild and recovery of Greater Christchurch;</li> <li>3. The land is subject to an Urban Growth Overlay and the area is either: <ol style="list-style-type: none"> <li>a. a ‘greenfield priority area’, or any subsequent urban growth areas or urban containment boundaries, in the CRPS where it is a residential activity; or</li> <li>b. identified in an adopted Rural Residential Strategy and in accordance with CRPS Policy 6.3.9 where it is a rural residential activity.</li> <li>c. The minimum net densities of 12hh/ha for residential activities or 1 to 2hh/ha for rural residential activities are met;</li> </ol> </li> <li>4. A diversity in housing types, sizes and densities is demonstrated to respond to the demographic changes and social and affordability needs identified in a HDCA, FDS or outcomes identified in any relevant Development Plan; and</li> <li>5. An ODP is prepared that addresses the matters listed in UG-ODP Criteria and incorporated into this Plan before any subdivision proceeds.</li> </ol>	<p>The Site is within an FDA identified in Our Space.</p> <p>The submission has an extensive discussion on Chapter 6 CRPS, on the issues around future development capacity, the status of the various District Council strategy documents, and Our Space which represents the Greater Christchurch Councils’ goals (now out of step and out of date) for providing future development capacity.</p> <p>That discussion notes <i>the current CRPS is not consistent with the NPS-UDC or its replacement, the NPS-UD. It retains a ‘hard and fast’ urban/rural boundary line which predates both NPSs and there is no ability to rezone land outside the Map A greenfield priority or existing urban areas.</i></p> <p>The point is made that the <i>NPS-UD 2020 has immediate effect, so in the meantime, proposals (such as this submission) must interpret ‘significant development capacity’ in the context of the overall intent and purpose of the NPS-UD as articulated in the NPS-UD objectives and policies.</i></p> <p>An assessment of the proposal against the NPS-UD 2020 concludes that the rezoning proposal is a fundamental inconsistency with Map A of Chapter 6 but is consistent with the approach of the NPS-UD for significant development capacity if it is added to the adjoining Plan Change 70.</p> <p>The proposed development is consistent with and will not give rise to any concerns with respect to all the matters listed in RPS Policy 6.2.1 clauses 4. to 11.</p> <p>The proposed rezoning will achieve a minimum 12 hh/ha and provide a greater diversity of housing choices, including more smaller more affordable medium density housing than existing housing available in Rolleston. An ODP <del>{DEV-PR3}</del> is proposed, which meets the UG-ODP criteria.</p>
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***p. in Appendix 11, paragraph 8(b), consider if the reference to the future District Park is relevant in the context of this request.***

**Response:**

Amend Appendix 11 as follows:



- b) Provide for urban development that will ~~bridge between the existing township and the future District Park to the east of the Site~~ **"square up" the town to the SW to provide good urban form with residential developments on most sides of the Site and** in a manner that enables efficient use of existing and future infrastructure and current land resources.

Yours sincerely



**RICHARD JOHNSON**

Senior Planner

Attachment 1: Amended ODP (RFI 11 and 15).

Attachment 2: Landscape Matters and Visual Assessment (RFI 12 and 20).

Attachment 3: Integrated Traffic Assessment including Network safety assessment and specific traffic/SIDRA analysis (RFI 13).

Attachment 4: Fraser Thomas response (RFI 28 and 29).

Attachment 5: Fraser Thomas response (RFI 30 and 31).

Attachment 6: Amended signature block (RFI 36 b.)

Attachment 7: Property titles (RFI 36 c.)

Attachment 8: Revised Infrastructure Report

Attachment 9: Nearby plan changes (as at 22/3/21)