

Response to Information Request for

**Plan Change 78 – Selwyn Road and Lincoln
Rolleston Road, Rolleston**

March 2021



The responses to the requests are set out below each item of the Request for Further Information as follows:

Q1. This Plan Change is heavily reliant on the National Policy Statement on Urban Development (the 'NPS-UD' to address the conflict with the Canterbury Regional Policy Statement (the 'CRPS'), particularly CRPS Objectives 6.2.1 and 6.2.2.5, and their associated policies. The assessment of the criteria in Policy 1 of the NPS-UD for 'well-functioning urban environments' provided in Section 6 of 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 to Q1

Firstly we comment that the plan change request assesses the proposed rezoning specifically in relation to the CRPS Objectives 6.2.1 and 6.2.2.5 without recourse to the NPS-UD.

With regard to the contribution of the requested rezoning to the "*function of the wider environment of the Rolleston township, the surrounding district and Greater Christchurch area*" we comment:

- The additional zoned land will provide for a variety of housing types and densities which may not be available in other areas and in particular may not be available at an affordable price. It therefore is complementary to other parts of Greater Christchurch
- The area to be rezoned adjoins roads with direct connections to adjoining areas and townships within Greater Christchurch. This creates good accessibility between home, work, schools and other community facilities within Greater Christchurch.
- Commuting from the rezoned area will involve generation of greenhouse gas emissions. This effect will be similar to commuting to and from other areas within Greater Christchurch. This approach does not fully support a "well-functioning urban environment" but neither do most of the available alternatives.

Q2. The request relies on Policy 8 of the NPS-UD as it asserts that it would add significantly to development capacity and is supported by an expert economic assessment that evaluates housing sufficiency in Rolleston. At its meeting on 9 December 2020, Council adopted an update to its Housing and Business Development Capacity Assessment for short-, medium-, and long-term housing sufficiency. There are also several plan change requests currently lodged with Council that are also proposing additional housing capacity. In the absence of clear direction in the CRPS at this point in time, please assess this request against the Ministry for the Environment guidance that identifies that the following factors can help to determine 'significant development capacity' in the context of the NPS-UD:

- significance of scale and location.
- fulfilling identified demand.
- timing of development.
- infrastructure provision (development infrastructure and additional infrastructure).

Response to Q2

The updated Housing and Business assessment for housing sufficiency recently adopted by the Selwyn District Council confirms two important changes to previous supply data. These changes are that the long term demand (2020-2050) for additional houses of 24,000 which had a surplus of 6,617 has now been reduced to 2,543. In the medium term the surplus which is in fact a deficit, increases from 2,737 to -12,483. These changes have resulted from much greater uptake of existing lots than foreseen. This situation means housing demand has been underestimated and that more land is needed for development within Greater Christchurch sooner and over the full planning period. Regarding the Ministry for the Environment guidance on what constitutes significant development capacity:

- The location of the plan change is aligned with existing development and the intended growth path for Rolleston and so is very well placed to provide much needed additional residential development that will be integrate into the township.
- The scale of the development is addressed in the plan change request
- Again the site is very well placed to provide for identified demand for additional residential development at an affordable rate given the proposed zoning regime and commitment to a minimum of 12hh/ha.
- The development will be able to proceed once residential zoning is in place. This will involve working through cost share arrangements for servicing. Once these are in place the applicants, who are very familiar with developing residential subdivisions in Rolleston, will be in a position to proceed.
- With regard to infrastructure the applicants accept the proposals suggested by Council staff and are willing to enter cost share for services that are require extension to the area.

Q3. Please provide further analysis of the request against Policy 8 that considers the:

- a. capacity proposed to be provided against the Council's updated capacity assessments over the short-term timeframes considered by the NPS-UD. The capacity proposed within the other plan change requests should be considered alongside the capacity that could be enabled through this request.
- b. contribution that the proposed plan changes may make to development capacity against the other factors outlined in the Ministry for the Environment guidance.

Response to Q3

Refer to response to Item 2.

It is not possible for an analysis of all the plan change requests to be undertaken by the applicant as details of these are not readily available. Logically the combination of these plan changes, even if only some are approved will, in combination, more than satisfy the requirement in Policy 8 of the NPS-UD in relation to constituting significant development capacity. We note however that some of these plan changes are within proposed Future Development Areas identified in the CRPS and as such are not in the longer term reliant on Policy 8 of the NPS-UD.

Proposed Selwyn District Plan

Q4. Council notified its Proposed District Plan on 5th October 2020. While the list of statutory documents to be considered when changing a district plan, as prescribed in s74 and s75 of the RMA, does not include a Proposed District Plan, case law suggests that s74 is not an exhaustive list and that scope exists to consider the provisions of the Proposed District Plan. As such, please provide a more detailed assessment of the request against the relevant objectives and policies of the Proposed District Plan, and in particular those provisions that have immediate effect.

Response to Q4

We are not aware of any provisions in the Proposed Selwyn District Plan that have immediate legal effect that could apply to the plan change. Possible provisions that might be relevant relate to providing for residential growth with the District. The only relevant objectives and policies relate to the Residential zone, Strategic Directions and Urban Growth.

RESIDENTIAL

Plan Change 78 will enable residential development that is anticipated by the Proposed District Plan. In particular the Residential Objectives and Policies seek safe, convenient, pleasant and healthy living environments. The new residential development within the PC78

area will provide for this through the workings of the ODP and the consequential subdivision.

STRATEGIC DIRECTIONS –URBAN FORM

The Plan Change document assesses all the matters relevant to the Urban Form and Development Objectives, in particular the location of urban growth, capacity to meet demand and integration of growth with the progressive sequencing of reticulated infrastructure services. .

URBAN GROWTH

PC78 Request in its policy analysis of the various tiers of planning documents addresses the matters sought in the Urban Growth Objectives such as urban form and development capacity to meet demand and integration of growth with infrastructure sequencing. UG-P1 refers to identifying new urban growth areas supported by a Development Plan. As the Rolleston Structure Plan is a recognised Development Plan and identifies south east Rolleston as an appropriate area for development as it is assessed that PC78 is consistent with this Policy. UG-P2, P3 and P4 address limitations on rezoning of land within the Urban Growth Overlay. PC70 satisfies these policies as it is within the Urban Growth Overlay. It is also a compact area adjoining land that has been developed and is currently being developed (Acland Park) or is likely to be developed in the near future.

Support for Plan Change and Consultation Outcomes

- Q5.** Please provide evidence that the owners of the properties subject to the plan change are party to, or supportive of, the request.

Response to Q5

The owners of all the land within the plan change have confirmed in writing to the applicants that they are supportive of the plan change request. A copy of the agreement entered into by owners with the applicants is attached (Attachment 2) to this response as well as a list of the owners who have signed this agreement. We are aware that one party has also lodged a submission to the Proposed Selwyn District Plan requesting a residential zoning clearly indicating their support for rezoning.

- Q6.** Please also document any consultation the applicant may have undertaken with Selwyn District Council, Environment Canterbury, NZTA or Nga Runanga via Mahaanui Kurataiao Limited.

Response to Q6

The civil engineer has held discussions with Murray England regarding servicing and in particular options for conveyance of sewage from this site ultimately to the Pines Treatment Facility. NZTA was not considered to be affected by this proposal to the extent that consultation was appropriate. The applicants are currently obtaining an assessment from MKT. On the basis of MKT assessments for other plan change requests in Rolleston it is expected that their concerns will relate to impacts on historical and cultural connections with the area, treatment of stormwater and use of plantings local to the area and whakapapa. Conditions on subdivision consents relating to these matters are welcomed by the applicants.

Integration with other Plan Changes

- Q7.** There are a significant number of plan change requests currently lodged with Council, with PC75 adjacent to the area of this plan change request. Please advise what, if any, consideration has been given to the positioning of key movement linkages and reserves between this plan change and PC75. Details of

PC75, along with all other plan changes, can be found on Council's website. Please also confirm that the movement linkages and reserves identified in the adjoining Acland Park subdivision are being provided to demonstrate integrated development outcomes can be achieved.

Response to Q7

Now that the applicants have access to neighbouring Plan Change 75 request they have worked with this party. PC 75 is, we understand, revised to include an additional east/west road link that connects to the western most north/south link in PC78. PC 78 has now provided for planned walkway/cycleway links on its western boundary with Acland Park. A revised joint PC75/PC78 ODP has now been prepared providing for these links and flood paths are removed to confirm with the ODP format sought by the Council. The amended combined ODP is attached to this Document as Attachment 1.

Infrastructure

Water, Wastewater, Stormwater and Services

Q10. As identified in the Infrastructure Assessment, the Rolleston water master plan provides the framework for the ultimate development of the network in the township, and this continues to be refined. To service this development at the densities proposed, trunk water mains are required along Lincoln Rolleston Road. The availability of water to service this proposed plan change is contingent on these trunk water mains being installed ahead of current proposed timeframes. As such, developer led infrastructure may be required under an Infrastructure cost share agreement. Please confirm that this is a viable option should it be required.

Response to Q10

The applicants confirm that cost share agreements are a viable option.

Q11. With reference to the wastewater masterplan (refer to **Attachment 1**), please confirm options to reticulate wastewater to the proposed Southeast Pump Station, as opposed to the Southern Rolleston Pump Station, as identified in the plan change request.

Response to Q11

The applicants confirm the option of pumping sewage via a "south east" pump station on the Selwyn Road frontage of the PC78 area and then to a pump station further south on Selwyn Road south of Springston Rolleston Road and then to the Pines Treatment Area.

Open space reserves

Q13. There are two recreation reserves shown on the ODP and these are sited adjacent to main routes and medium density areas which is supported. The proposed reserves appear to be around 600m apart from other planned reserves (including those identified in PC75) and the distribution appears to be generally in accordance with Council levels of service (from a cursory measure). However, the Design Statement mentions the two reserves will provide access to a reserve for all residents in the subdivision within an 800m radius. The guideline in Council's policy is between 500m to 600m. Please provide confirmation of the design rationale for the open space reserves and the extent to which the locations are consistent with SDC's guidance.

Response to Q13

We confirm that the separation between 500m and 600m will be adopted and that the reference to 800m is not correct. This has been amended in the Design Report attached as Attachment 3.

Q14. The request details two recreation reserves that *“provide the quantity of greenspace and facilities appropriate to the population”*. However, there is no further assessment of the size or quantity of greenspace to be provided that makes it difficult to assess whether the reserve/open space proposed is adequate. The application also talks about green linkages, but these are not indicated on the ODP. Please provide further detail on the size of the proposed reserves and how the green space linkages are to be achieved.

Response to Q14

The reserve areas are in the order of 3000m² in keeping with local reserves in the newer areas of Rolleston.

Urban Design/Planning

Outline Development Plan

Q16. The Design Statement in Appendix E evaluates the plan change request against the New Zealand Urban Design protocol and relevant landscape and visual criteria. However, there does not appear to be an assessment of the ODP against CRPS Chapter 6 Policy 6.3.3, which is the basis of the Living Z Zone objectives, policies, and rules. Please update Appendix E with an urban design assessment of the proposed ODP against the pre-requisites listed in Policy 6.3.3 and submits any amendments. This should also address the following urban design matters and inform the preparation of the text that accompanies the ODP plan in Appendix E38 of the District Plan:

- a. a contextual analysis of the site and its surrounds to support the Design Statement, including any constraints and opportunities present in the wider area (such as zoning, existing environment, natural or heritage features, integration of water races into the design, built form or site features).
- b. in respect to the assessment of effects on Visually Sensitive Receptors contained in the Design Statement, please justify how the magnitude of change can be determined as being ‘low’ where the overall character will change from open and rural to suburban and dense?
- c. in respect to Viewpoint 6, specifically, what measures have been undertaken to retain some of the views to Alps and Port Hills?
- d. what interface treatments that are proposed to integrate the site with the adjoining Acland park subdivision and PC75 land?
- e. what boundary treatments are proposed along the frontages of the residential properties with Lincoln-Rolleston Road and Selwyn Road?

Response to Q16

The Design Statement has been amended to address most of the matters raised – Refer Attachment 3. With regard to retention of views from Viewpoint 6 and interface and boundary treatments these are most appropriately developed as part of the subdivision design when all aspects of the site and servicing requirements are taken into account. In relation to the magnitude of change, the reference to “low” reflects the dynamic landscape character of the outer edges of Rolleston township which involves ongoing and frequent changes from rural lifestyle to residential.

With regard to CRPS Policy 6.3.3 relating to Outline development plans we provide the following assessment:

1. (a) There is a single ODP for this area

(b) The ODP contains some but not all elements of the Rolleston Structure Plan as discussed in Q22.
2. With regard to the Urban Design Protocol only some elements are directly relevant given the area is not distinctive and does not lend itself to a particular form of development that differs from other areas. The infrastructure, movement networks and reserves will be integrated to provide an urban area that is easy to comprehend and access with a high degree of connectivity. A choice of residential forms is provided for however the final determinant of this will be public demand. The subdivision will be constructed to return water to ground and to treat it as required to limit impacts on groundwater. The street alignments of the ODP have been designed to enable all properties to build to obtain solar gain.
3. Principal roads are shown as is land for recreation, different residential densities and pedestrian walkways and cycle ways.
4. The proposed residential development area is not within the boundaries of Map A however the plan change is within the proposed amendment to Map A based on the Projected infrastructure boundary.

The development will achieve a minimum of 12hh/ha.

Housing affordability is intended to be achieved with the medium density developments which will occur as shown on the ODP and which may also occur in other areas through the subdivision process as has occurred to date in the Living Z zone.

5. There are no specific values on the site which require protection.
6. The infrastructure is not subject to specific constraints and so it is not necessary for it to be identified and/or controlled through the ODP.
7. The staging has not been finalised as the location of the on-site and off-site sewage pump stations serving the area has not been decided by the Council at this stage.
8. The ODP has major and lesser routes for various forms of movement within and through the area.
9. There is no nearby infrastructure that needs to be avoided.
10. The protection of surface and groundwater quality will be achieved through a series of regional consents for construction and operation of the subdivision.
11. The natural hazard effects are limited to minor surface flooding which will be dealt with through ground formation channelling surface water from sites to roads and then to ground or to purpose built systems.

12. Not relevant

Q17. The ODP references the flood plains relative to the road corridor alignments. Although this is useful context to illustrate an aspect of the rationale that has been applied to establish the alignment of the roading network, this level of detail is not typically illustrated on an ODP. As a result, it may create confusion with how Policy 6.3.3.3(f) and (h) of the CRPS is applied. This includes whether this land is susceptible to flood hazard risk and is being excluded from residential development, which I understand is not the intention in this case. Please review the ODP, confirm the rationale for why the *“Selwyn Flood Routes to be Redirected to Roads”* has been referenced in the context of CRPS Chapter 6 Policy 6.6.3, and submit any amendments.

Response to Q17

The flood plains areas have been removed from the ODP – see Attachment 1.

Q18. The request does not include all of the properties that are comprised with the south-eastern corner of Rolleston’s Future Development Area, where rural parcel at the corner of Lincoln- Rolleston Road and Selwyn Road has been excluded from the request. Please provide the rationale for excluding this land holding, including in respect to how infrastructure in this area will be coordinated and what boundary interface treatments are proposed to manage amenity, outlook, and reverse sensitivity effects (refer to Point 24 below).

Response to Q18

The applicants have liaised with the owner of the land on the western corner of Selwyn Road and Lincoln-Rolleston with a view to the land being included in PC78. However, the discussions were inconclusive therefore the land has not been included as it was not considered appropriate to zone land when an owner was not in agreement.

Housing densities

Q19. The request uses the Special Housing Policy and Our SPACE Action 9 as the rationale for the proposed 12hh/ha densities. Please provide an evaluation of these proposed housing densities against other relevant aspects of Our Space including Action 2 in respect to improving housing affordability and Actions 3 in respect to the appropriateness of increasing the minimum densities on the Future Development Areas from 12hh/ha. These Actions signal work streams to align residential ‘greenfield’ housing densities to respond to the housing demand profile of Greater Christchurch, which are also supported by the RSP that indicates Medium Density Residential at 20hh/ha around local centres and across a relatively large proportion of the PC78 site (**Figure 1**). Please provide an evaluation of the housing densities against the identified Our SPACE Actions and the RSP.

Response to Q19

The proposed minimum density of 12hh/ha was chosen specifically to provide for higher densities if these are required to respond to changing housing demands and needs. Unlike the operative District Plan it does not have an upper density limit and therefore provides flexibility for the overall density of the area. It is acknowledged that the ODP uses the terminology of the Proposed Selwyn District Plan in anticipation of the land also being rezoned under this Plan. However for consistency and as requested we have amended the ODP adopting the current District Plan requirements for the Rolleston Living Z zone.

With regard to Actions 2 and 3 of Our Space, these are evaluations and actions which are intended to be undertaken by the District Councils in their review of their district plans. This is not something that the applicant can achieve and it appears on the basis of very limited additional residential

zoning within the Proposed District Plan that the Council has not taken the lead on these matters. However this plan change and other plan change requests will provide Selwyn District Council with a wealth of feedback and land for development addressing in a significant way the matters raised and referred to in the Our Space actions in the "Schedule of future work".

Q20. PC78 requests that a Living Z Zone is applied to the site, which is supported by an Outline Development Plan that illustrates the following lot size standards:

- Medium Density Residential 400m² - 499m².
- General Residential Minimum 500m².

These site sizes and naming conventions (which appear to be based on the terms referenced in the Proposed District Plan) used are not consistent with the existing Living Z (Rolleston) sizes set out in Table C12.1 Allotment Sizes in the Operative District Plan. Given this, please either:

- a. provide an assessment of these variances in terms of its effect on plan integrity, and spatial effects from different lot sizes; or
- b. amend the application and the ODP to be consistent with the Operative District Plan site sizes and naming conventions.

Response to Q20

Refer to the response to Q19.

Q21. While the densities included in the request are consistent with the Proposed District Plan, these are some way from being formalised and this request needs to be evaluated against the Operative District Plan at this point in time. As a result, please provide additional information on the densities that are being proposed, including:

- a. the rationale for placing medium density along the main spine as to being clustered or distributed throughout the site.
- b. clarifying whether the medium density housing on the ODP is for small lots or includes comprehensive lots. In this context, please elaborate how a mixture of housing typologies and section sizes can be provided. A draft subdivision plan would assist in illustrating how the densities and layouts have been determined and to measure the legibility and walkability of the road network.

Response to Q21

The placement of medium density lots along the main spine road follows numerous other similar approaches in recent Rolleston developments. This approach appears to meet the needs and desires of the residents with these lots generally being the first to sell. This includes the older "small lots" on Rolleston Drive south west of Othello and Rembrandt Drives. The applicant advises that no comprehensive lots are specifically provided for in the ODP. With regard to the suggestion that a draft subdivision plan would be inappropriate at this stage as that level of detail needs to be worked through by owners of the properties which may change in the future.

Rolleston Structure Plan

Q22. The RSP illustrates several features that do not appear to have been factored into the ODP, including "*avenue planting*" along the Lincoln-Rolleston Road boundary and "*green corridors and green belt*" along the Selwyn Road interface (refer to **Figure 1**). Please provide an assessment of how these design features have

been factored into the ODP, including consideration of how other zoned changes and the Special Housing Areas have implemented these aspects of the RSP.

Response to Q22

The applicant is not aware of any avenue planting in other zoned or special housing areas. With regard to green belts the applicants understand that development of Rolleston East land will require an extension of the combined cycleway/walkway on the south side of Lincoln Rolleston Road through to its intersection with Selwyn Road.

Q23. The RSP indicates that a Local Centre is anticipated in the SR13 area to support the future local retail needs of the community in this area (refer to **Figure 1**). The ODP does not make any provision for this Local Centre to compliment the commercial centre hierarchy in Selwyn 2031, the Operative District Plan and the CRPS. Commercial centres are also a focal point for higher density housing, as illustrated in the RSP. Please provide an assessment documenting the rationale for why provision has not been made for a Local Centre in the general location identified in the RSP and what implication this may have on housing densities and the ability for future residents to access their local retail and service needs.

Response to Q23

The applicants have been liaising with the proposers of PC75 with regard to this matter. It has been assessed and decided that the best option for a viable local centre to serve the future residents of the general area is on Lincoln Rolleston Road where a roundabout is proposed approximately 1200m north-west of the intersection of Lincoln Rolleston and Selwyn Roads.

Reverse Sensitivity effects

Q24. The effect of PC78, if approved, would be to leave the land holdings at the corner of Lincoln-Rolleston Road and Selwyn Road with a Rural (Inner Plains) Zone. The application states that *“There is no intensive animal or crop production on the vicinity of the Plan Change area...”*. However, it is understood that this land is currently utilised as an intensive agricultural operation that extends to the opposite side of Selwyn Road. The day-to-day operations of this market garden may use mechanical equipment, bird control devices, and application of fertilisers, compost or sprays on a regular basis that could conflict with the amenity expectations of the future residents of the PC78 land if the proposed zoning is formalised. Please provide the rationale for excluding this land from the plan change request and review the assessment detailing how the ODP responds to potentially adverse reverse sensitivity effects at the interface between this rural land and the proposed Living Z Zone.

Note: *There is also a poultry farm operating from the opposite side of Selwyn Road to the wider block that contains the application site. It is recognised that the 300m reverse sensitivity buffer associated with this intensive farming operation does not extend into the boundary of this request. If at some time in the future this land is included in the request, then an assessment of how the zoning could impact on the operation of this activity should be provided.*

Response to Q24

The situation of residential areas adjoining rural areas occurs frequently and is inevitable with extensions of urban areas. The adjoining land while used for growing vegetables is not as intensive as suggested. It is considered inappropriate at this early stage to develop a strategy to deal with potential reverse sensitivity issues as the neighbouring land uses may change prior to development of a detailed subdivision proposal. The applicants are also aware that including the corner site raises the issue of setback from the poultry farm.

Contaminated Land Assessment

Q25. The Preliminary Site Investigation (the 'PSI') provided with the plan change request has been peer reviewed on behalf of Council by Environment Canterbury's Contaminated Land Team. The peer review highlights that the PSI only covers 24.9 ha of the proposed 63.326 ha subdivision. There is a HAIL activity identified on LOT 2 DP 48064 which is not discussed in the application. 127 Lincoln Rolleston Road and 548-564 Selwyn Road have also not been investigated. Therefore, please provide an assessment outlining why these properties have not been investigated for potential HAIL activities.

Response to Q25

As with a number of plan change requests with multiple properties not all have been subject to testing. The property you specifically refer to (Lot 2 DP 48064) already has a PSI report which states that although market gardening/ growing of vegetables occurred on site that no hazardous activities had been undertaken. Soil samples were undertaken which indicated that copper was below background levels and DDT and trifluralin were at low but detectable levels. This is considered to be sufficient assessment for the purposes of a plan change.

RESPONSES TO ANDREW MAZEY's email of 18 February

- The ODP has been refined and the stormwater layer removed to provide a clearer depiction of the movement layer.
- The applicant has liaised with the Falcons Landing developers (PC75) to achieve a fully integrated approach in the south east area of Rolleston including the suggested additional north/south road link.
- Frontage development upgrades have not been included in the ODP and we note no other ODP has made this provision. However the applicant expects these upgrades to be required through the subdivision consent process.
- The applicant appreciates the information regarding Council's intentions for various intersections and the road upgrades
- Regarding the Ed Hillary Drive extension and its intersection with Lincoln- Rolleston Road, this occurs with the PC75 area and so it not directly relevant to PC78. It is understood that this might be a roundabout.
- We are pleased to be advised about the walking/cycle ways in Acland Park and have amended the ODP to ensure connection with these.