

ADDERLEY HEAD



8 April 2010

Attention: Craig Friedel
Selwyn District Council
PO Box 90
Rolleston 7643

Dear Craig

PC090008 AND PC090009: SELWYN PLANTATION BOARD LIMITED (SPBL) PRIVATE PLAN CHANGES: REQUEST FOR FURTHER INFORMATION AND AMENDMENTS

- 1 We refer to your request for further information and amendments dated 22 March 2010 (RFI), which has been referred to our office for response.
- 2 Please find below our response to the Councils' RFI. We have set out in full each RFI, which is then followed by SPBL's response.
 - 1 *Confirm whether the proposed Countryside Areas, reserves and roadside treatments detailed in the Outline Development Plans are to be vested in Council and what the actual size of those areas will be. If these areas are not proposed to be vested in Council, then confirmation of the management structure of these areas is required to ensure that they are maintained to the necessary standards and to gauge the extent of public access to the development.*
- 3 The roads are intended to vest in Council. The treatment of the roads is identified in Appendices 34 and 35 (Local Road Plan and Local Road Section) and this treatment is intended to promote rural-residential character.
- 4 The reserves are also likely to vest in Council, subject to final agreements on reserve contributions. Both Homes and Skellerup Blocks have proposed reserves (the Harrison Grierson visual and landscape assessment report is included only as a background report to the Vivian-Espie Report and refers to an earlier layout for Holmes Block in which no reserve was proposed).
- 5 The 'Countryside Areas' are not to vest in Council and will remain in private ownership. Exactly how they are to be owned is yet to be finalised, however, that has no bearing on the potential effects of the Proposed Plan Changes.
- 6 The actual size of these areas will be determined more accurately at the development stage, but the areas shown on the Outline Development Plans in Appendices 34 and 35 are as follows:

	Roads and Walkways	Reserves	Countryside Area
Holmes	10.0ha	0.5ha	14.1ha
Skellerup	7.4ha	0.5ha	13.2ha

2 *Clarify the land uses proposed for the Countryside Areas to determine how effective this may be in promoting the anticipated level of rural residential character.*

7 In terms of activities within the 'Countryside Areas', provisions have been proposed which restrict the construction of any dwellings within the same and makes this activity non-complying. The intention is that these areas provide an element of rural amenity. Rural amenity comes in many different forms from open pasture, fields of crops, presence of livestock, shelter belts, to name a few. The Countryside Areas have been located to create broad vistas to the rural land, and to create a green buffer along Dunns Crossing Road. Their proposed width (not less than 50m) was selected by Harrison Grierson and Vivian Espie as being suitable to achieve the appropriate sense of space. They are nearly always located adjacent to a road corridor, which along with large yards on adjacent properties serves to add further width to this building-free corridor. This is anticipated to be an effective component in establishing a rural residential character.

3 *Confirm whether additional assessments have been undertaken by Golder Associates to ensure the private plan change will not result in adverse reverse sensitivity effects that may undermine the current operation of the RWTP and the future operation of the ESSS. The SPBL requests need to include an assessment of environmental effects that considers Council's current request for discharge permit for the ESSS. Attendance to these matters are considered necessary to ensure that the SPBL plan change requests do not undermine the ability for the RWTP to expand as the ESSS in accordance with the discharge permits currently lodged with Environment Canterbury, should they be granted.*

8 Each Plan Change application includes an odour assessment completed by Golder Associates (Golders). The odour assessment includes analysis of odour effects of the Rolleston Wastewater Treatment Plant (WWTP) on future inhabitants of the Plan Change land and specifically contemplates the possibility of expansion of the Pines WWTP site include treatment and disposal of wastewater from Lincoln, Prebbleton and Springston¹.

9 The Golder report recommends a range of buffer distances associated with the Rolleston WWTP. Such recommendations are conservative and contemplate the proposed Pines II expansion². Golders recommend a 200m buffer in respect of effluent irrigation and advises that if the Council decides to proceed with spray irrigation on land to the south of the Holmes Block, then...

*"They would need to ensure that no adverse odour effects occur beyond their boundary. This could be achieved using a buffer/setback or various management practices that control the way irrigation is undertaken in order to minimise odour."*³

10 In addition, Golders have recommended a 1000m from the Pines bio-solids treatment area. This causes an area identified as "odour constrained area" with the Holmes Block identified at Figure 4 of the Golder report. This area is identified on the ODP for the Holmes Block⁴ of the landscape and visual effects assessment report at Appendix D of the applications.

¹ Refer section 5.0 of Golder Associates' report.

² Refer section 6.2.4 of the Golder report.

³ Refer section 6.2.4 of the Golder report.

⁴ Refer Appendix 2: Proposed Outline Development Plan, at page 35 of the report.

- 11 We have provided Golders with a copy the designation notice of requirement (NoR) and resource consent applications by the Selwyn District Council for the expansion of the Pines WWTP.
- 12 Golders have confirmed that the setback distances discussed in the above-mentioned odour assessment remain appropriate.
- 13 In summary, the private Plan Change will not result in adverse sensitivity effects that would undermine either the current operation of the Rolleston WWTP or the future operation of the East Selwyn Sewer Scheme (ESSS) for the following reasons:
- 14 First, the 1000m setback to avoid odour effects from bio-solids treatment has been confirmed as appropriate by Golders, and this is reflected in the existing odour constrained area shown on the Holmes Block ODP.
- 15 Secondly, Golders has confirmed that a setback of 200m is appropriate in respect of treated wastewater, spray irrigation, and residential development. It is generally well understood that persons that undertake activities causing emissions that might cause adverse nuisance effects on neighbouring land have an obligation under the RMA to internalise any such adverse effects within the boundaries of their property. The areas indicated in the Council applications for possible effluent irrigation and designations are excessive and unnecessarily large to enable practical operation of the proposed ESSS. In these circumstances, the required 200m setback of effluent irrigation on land to the south of the Holmes Block can be readily incorporated into any proposed ESSS without any adverse effect on practical operation of the proposed ESSS.

4 *Confirm that the reference to 'Variation 4' of PC1 to the RPS in Paragraph 1.8 is correct or whether it is required to be amended to 'Variation 1'.*

- 16 As noted, both Variations 1 and 4 to PC1 affect Rolleston and, whilst we do not believe anything turns on this point, if Council would like to substitute references to 'Variation 4' with 'Variation 1', we have no objection to the same.

5 *Assess the extent to which the proposals align with the greenspace network, reserve corridors, recreation precincts and walkability identified in the Rolleston Structure Plan.*

- 17 Both Plan Changes make provision for a public walkway along the Dunns Crossing Road frontage of each site⁵, and each have public roads connecting to the same. In addition, over the Holmes Block there are two additional pedestrian/cycle links⁶ provided to Dunns Crossing Road. As such, any future walkways established in the surrounding area that link to Dunns Crossing Road will then be able to gain easy access into the site through the aforementioned connections.
- 18 In terms of the Rolleston Structure Plan ('RSP'), we note that there are no walkways or cycle routes identified near the Holmes Block and, as such, Dunns Crossing Road will provide for these opportunities. In addition, the proposed public walkway along Dunns Crossing Road in front of the Holmes Block provides further opportunities in this respect.

⁵ The nature of the red arrow indicating 'public walkway' along these roads is undetermined. It could just be a footpath within the road corridor (and we have not counted it in "walkway" in the table above).

⁶ We have assumed however that these would likely be publicly owned walkway, and have been counted as such.

- 19 The RSP does indicate a cycle route on Dunns Crossing Road adjacent to the Skellerup Block, and the two road connections into the site from this road will provide for an expanded 'cycle circuit'.
- 20 Given the above, we consider the rezoning of the two sites in question will fit well with the possible future pedestrian and cycle connections on the western side of Rolleston.
- 21 With respect to the alignment of the Proposed Plan Changes and the green space and reserve corridors as identified within the RSP, both sites provide for open space and shelterbelt/rural buffer planting along Dunns Crossing Road. In addition, distant views through each site are provided for through the identification of 'Countryside Areas' crossing each site. The Proposed Plan Changes are therefore considered to be consistent with the RSP in this regard.
- 22 The combined public walkways and Countryside Areas that are proposed along the road frontages of both Plan Change sites will combine with any Green Corridor treatment on the eastern side of Dunns Crossing Road, as is indicated on the RSP, to provide broad corridors of high amenity (in terms of views, open space and pedestrian movement) along the relevant stretches of Dunns Crossing Road, and will tie in with the identified stretch of Recreation Reserve along the western side of the road between the two Plan Change sites.
- 23 In addition, the various proposed Countryside Areas and footpaths within the road corridors of the two Plan Change sites will combine with the RSP's identified reserves adjoining Dunns Crossing Road to provide easy and high amenity walkable access from the proposed allotments of the two Plan Changes and neighbouring land to the two Local Centres to the east of Dunns Crossing Road, the Neighbourhood Centre on Brookside Road and the large recreation reserve on the corner of Lowes and Dunns Crossing Roads, all identified on the RSP, as well as destinations further afield.

6 *Confirm the extent to which the plan change requests align with the staging of development outlined in the Rolleston Structure Plan.*

- 24 In terms of staging, it is clear through PC7 that the CDL land opposite the Holmes Block is to be developed in the first planning sequence, being from now out to 2020. However, even if the CDL development is delayed, good links exist between the Holmes Block and the commercial area of Rolleston via Brookside Road, which intersects with Rolleston Drive. In addition, Lowes Road (close to the site) provides access to both the sports fields on the same and through to the new Primary School between Lowes and Goulds Roads, while Brookside Road provides a connection through to the existing Primary School.
- 25 In terms of the Skellerup Block, Dunns Crossing Road provides a direct connection to Lowes Road, which provides direct and easy access into the centre of Rolleston and the aforementioned amenities and facilities.
- 26 Given the above, the two sites in question are already well served by road connections and there is no need to delay the establishment of rural residential allotments while other land close by develops for residential purposes.

7 *Assess the proposed CDL Block, the Rolleston Structure Plan and PC7 to consider the wider interaction between the township and the development site, with particular emphasis on the safety and efficiency of the road network given the relatively close proximity of the CDL Block to the Holmes Block.*

- 27 This request has been considered in detail by Andrew Metherell of Traffic Design Group. His full response dated 7 April 2010 is attached to this letter.

8 *Assess the extent to which the plan change requests achieve the rural/urban interface anticipated by the Rolleston Structure Plan for along Dunns Crossing Road, particularly whether the Countryside Area achieves the outcomes sought by the 'Green Belt' concept identified in the Structure Plan.*

- 28 The RSP drawing indicates a greenbelt on the north-eastern side of Dunns Crossing Road (i.e. the opposite side from the SPBL sites and inside the Metropolitan Urban Limit (MUL)). This scenario is also illustrated in the Indicative Greenbelt cross section on pages 92 to 93 of the document. However, the RSP text identifies that a landscape buffer strip of approximately 50m is to be created *between* the MUL and surrounding rural areas.

- 29 In any event, it was recognised that the lengths of the SPBL landholdings offer a good opportunity to achieve the intentions of this greenbelt with a consistent treatment along most of Dunns Crossing Road. As such, layouts for both blocks include the proposed 'Countryside Areas', which provide an approximately 50m wide landscape 'strip' along the south-western boundary of Dunns Crossing Road.

- 30 The treatment of this area is anticipated to include open grassland or cropped areas. Its western edge is defined by a proposed shelterbelt (annotation of "shelterbelt treatment required" on the ODP's in Appendices 34 and 35). This is broken by the 'Countryside Areas' also extending to the south-west (two in Skellerup and one in Holmes) to provide views through each site, thus ensuring distant views through the rural landscape. It is anticipated that the Countryside Areas could easily combine (in a design sense) with any future green space treatment on the opposite side of Dunns Crossing Road, as is identified by the RSP. Alternatively, these spaces proposed by the two Plan Changes could, partially or entirely negate the need for any additional green space treatment in these areas.

- 31 The RSP states that '*a strong visual sense of open rural character and amenity in the design of the buffer is important*' (p93, RSP). The 'Countryside Areas' along Dunns Crossing Road provide open space and planting areas that provide this sense of open rural character and amenity sought by the RSP in these locations.

- 32 It is considered that the 'Countryside Areas' create a clear rural/urban spatial edge to Rolleston and achieve the outcomes sought by the "greenbelt" concept sought within the RSP.

9 *Provide a servicing plan that details the location of street lights within the Local Road network of the development and clarify the extent of public access to the development sites, particularly to the Skellerup Block.*

- 33 At this stage, we do not consider it necessary to provide a servicing plan, as this detail will no doubt be worked through as part of detailed design associated with the subdivision process in the future (if the plan changes are successful). We assume the intent of this point is to identify the extent of, and where, the maintenance requirements will lie. In this regard, the roads will be public roads, as opposed to private laneways, and the maintenance costs associated with street lighting and street trees will lie with Council. It is uncertain at this stage as to the extent of street lighting to be established; however, we anticipate that street lighting will be consistent with that expected for a rural-residential development (i.e. substantially less than for urban development). The ODP diagrams for Local

Road Cross sections in Appendices 34 and 35 remind Plan users in future that the roads should include "*streetlights selected to maintain rural character*"

- 34 With respect to the matter of public access, the proposed local roads will be public roads and, as such, will be available for public use. The reason for the identification of the public walkway link into the Holmes Block is to ensure that easements (or other ownership arrangements) are put in place during any future subdivision process so as to provide for public access into the site in addition to that provided by the single road connection to Dunns Crossing Road. The Skellerup block is provided with multiple road access points onto Dunns Crossing Road, and no specific public walkway link is considered necessary given the public will be able to utilise these road connections for access into the site.

10 *Provide an assessment of the plan change requests against Selwyn District Council's Walking and Cycling Strategy and the Greater Christchurch Travel Demand Strategy, both of which are considered relevant for peri-urban developments of the scale proposed.*

- 35 Turning to the Selwyn District Council's Walking and Cycling Strategy and the Greater Christchurch Travel Demand Strategy, we have reviewed the same in light of the proposed plan changes. We respond as follows:
- 36 The broad intent of the abovementioned strategies is to increase the use of sustainable transport modes such as walking and cycling, and to reduce reliance on the private motor vehicle. In this regard, each site adjoins the current town boundary and will therefore avoid people having to travel great distances for services that are generally associated with rural-residential development of this nature.
- 37 In addition, the proposed local road cross sections for both the Skellerup and Holmes Blocks provide a footpath of 1.5m in width each along local road, thus ensuring that pedestrian access is provided for, and available, throughout the blocks. In addition, the Holmes Block provides for two direct public access links into the site from Dunns Crossing Road. A public walkway is identified adjacent to each block along Dunns Crossing Road. This provides the ability for pedestrian access along Dunns Crossing Road and for connections to be made into other pedestrian networks throughout Rolleston.
- 38 We note that the RSP identifies a cycle route along Dunns Crossing Road directly adjacent to the Skellerup block. While no cycle route is provided directly adjacent to the Holmes Block, the site is located in close proximity to Lowes Road and Brookside Road - both provide ready access to the Rolleston town centre for cyclists. In addition, public transport route patterns (orbital and potential services) are identified within the RSP that are in relatively close proximity (within a 5-10 minute walk) to both sites.
- 39 The provision of footpaths, public walkways, and the sites proximity to the current town boundary combine to provide a range of sustainable transportation options to each site, thus achieving consistency with the goals sought in the Walking and Cycling Strategy and Greater Christchurch Travel Demand Strategy.
- 11** *Provide copies of the plan change requests on CD Rom so that it can be confirmed they are in the correct order and to enable images to be printed in larger formats (A3 rather than A4) and in colour where necessary. This will ensure the applications can be clearly understood by Council staff, decision makers and members of the public. An electronic version will also reduce staff time required to scan the applications and to print copies.*

40 CD Rom copies of the Plan Changes will be provided following Council receipt and response to the matters discussed above. We do not currently anticipate there being any further change required to the Plan Change documentation however we would prefer to have this confirmed by the Council to avoid provision of multiple CD Rom copies.

41 Please note that the address for service in respect of each of the Plan Change applications is as follows:

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42 Please ensure that all correspondence regarding this matter is copied to:

Attention: Greg Dewe
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Level 2, Rural Bank House, 122 Gloucester Street, Christchurch 8011
P +3 367 3262
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43 Please contact the writer if you wish to discuss any of the matters above.

Yours faithfully
ADDERLEY HEAD



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Partner

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