

20 September 2021

Birches Village Ltd
C/- Baseline Group
PO Box 8177
Riccarton
CHRISTCHURCH 8440

Attention: Sally Elford

Sent by email to: sally@blg.co.nz

Dear Sally

**PC79: Private Plan Change Request to the Operative Selwyn District Plan at Southwest Prebbleton:
Request for Further Information**

Thank you for your request lodged on behalf of Birches Village Ltd ('the applicant') to change the Operative Selwyn District Plan (zoning at Prebbleton plus consequential text amendments). In accordance with Clause 23 of Schedule 1 of the Resource Management Act 1991 (RMA), the following information is requested to enable Council to better evaluate the potential effects of the change, the ways in which adverse effects may be mitigated, and the nature of consultation undertaken.

Clarification of yield and capacity

- 1) The ODP and the lot yield referred to in the Economic Assessment and the application are based on achieving a minimum density of 12 households per hectare ('hh/ha'), giving an overall yield of approximately 439 units across a 36.58ha site. The Operative Plan rules controlling minimum lot sizes are set out in Township Volume rules 12.1.3.29-48 (for Prebbleton) and Table C12.1 and are specific to each township. These rules require a minimum average density of 700m² for low density areas and 500m² for medium density areas (where developments are not undertaken in a comprehensive manner). These minimums are larger in Prebbleton than the other Inner Plains townships such as Rolleston where experience has shown that 12 hh/ha yields are more readily achievable.

Given that no medium density areas are shown on the ODP (and therefore any medium density is subject to a fully discretionary resource consent), please confirm that the delivery of a minimum overall density of 12 hh/ha is achievable without site-specific amendments to the standard Living Z zone density rules for Prebbleton.

- 2) The economic assessment predicts conservatively that Prebbleton will increase by 1,100 residents between 2021 and 2028. This equates to approximately 450 new households at 2.5 people per household. Council has already accepted for notification PC68 and PC72 which between them provide for over 1,000 new units. Whilst these two private plan changes have yet to be heard, in the event that they are both accepted, it would appear that they will provide more than twice the necessary capacity identified in the economic report.

Can you provide commentary on the level of necessary capacity in both Prebbleton (if one or both of these other two plan changes are accepted), and more widely across the Inner Plains townships and noting the additional capacity anticipated through the Future Urban Development Areas ('FUDAs') shown in PC1 to the Canterbury Regional Policy Statement and the recent approval of subdivision consent for a large part of the Rolleston FUDA through the EPA fast track process.

Parks location and quantum

- 3) The ODP shows a central green strip. The Urban Design report refers to parks ranging in size from 3,000m²-6,000m², with medium density housing areas located adjacent to these spaces. It is unclear whether such parks are in addition to the central green corridor or are simply part of the corridor.

Please provide clarification as to whether additional parks are also proposed, or whether such parks will simply form part of the central green corridor.

- 4) Feedback on parks has been received from Mark Rykers, Council's Manager for Open Space and Strategy. Given the site's proximity to the new District Park, and Council's 500m internal service standard for proximity to parks, there is minimal need for additional park-based open space as the majority of the plan change area is within a 500m walking distance of the District Park. Council would therefore be reluctant for further parks to be vested. Council's open space team are however supportive of the central green corridor concept, especially if it also incorporates blue/ stormwater functions and off-road transport options (and therefore could potentially be vested as reserve relating to those infrastructure functions rather than for recreation purposes).

If no further open space areas are proposed, then medium density housing will need to be located along an alignment that is parallel with the central green corridor (although smaller Local Purpose (Landscape) reserves in the order of 1,000-2,000m² may be acceptable where integrated with medium density developments).

Can you confirm that in the absence of additional local parks being vested, that the ODP will still deliver good urban design outcomes with medium density arranged as parallel strips either side of the corridor. If so, there would be merit in updating the ODP to show medium density housing either side of the corridor to reduce future consenting hurdles and to provide more certainty regarding the general location where such densities are anticipated.

- 5) Feedback from the Open Space team is that *"We believe that the placement of the green corridor is important in terms of how and where it will provide connection to the Birches Road Park. It needs to ensure that it does not create conflict with high traffic zones such as the park entrance and car parks. We are therefore of the view that it should connect with Birches Rd just north of the car park which is slightly further north than the current location indicated on the ODP"*. Please amend the ODP to show this change in alignment.

Consultation

- 6) Please provide an update on any pre-lodgement consultation with Mahaanui Kurataiao Limited on behalf of mana whenua.

Other matters

Feedback has been received on geotechnical (letter attached for reference) and NES-Soil Contamination, with no further information sought on these topics.

Feedback is yet to be received on transport or three waters servicing. Rather than delay the processing of this application we will pass on feedback as and when it is received, noting that if need be any issues can also be addressed in s42a reports as part of the hearing process.

Process from here

Once the Council has received a response to the above requests, it may be necessary to ask for further clarification of the extent to which this response addresses the above. Whilst you may decline to provide the above information (Clause 23(6)), you need to be aware that the Council may reject the request on this basis.

Once the Council is satisfied that it has adequate information, a report will be finalised to consider and make a recommendation on how to deal with your request i.e. whether to accept it for notification.

Please do not hesitate to contact me on (03) 964-4630 or jonathan@planzconsultants.co.nz if you have any questions.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Jonathan Cleese', with a stylized flourish at the end.

Jonathan Cleese

Consultant Planner

On behalf of the **SELWYN DISTRICT COUNCIL**