

11 February 2022

Selwyn District Council

Novo Group Limited
Level 1, 279 Montreal Street
PO Box 365, Christchurch 8140
0 - 03 365 5570
info@novogroup.co.nz

Attention: Liz White

By email: liz@lwp.co.nz

Dear Liz,

PLAN CHANGE 80: RESPONSE TO REQUEST FOR FURTHER INFORMATION

1. Thank you for your letter dated 9 November 2021. We respond to your questions below, per the numbering of your letter.

Extent of Plan Change Area

Question 1: The south-west corner of the proposed Outline Development Plan (ODP) incorporates an area of unformed legal road. This land parcel is not mentioned in the Request and it is not shown on the ODP as providing road access. Please confirm if the parcel is to be included in Plan Change area, and if so, please amend paragraph 1 of the Request to include this parcel, and outline how the road is proposed to be managed. For example, will it remain as an area of road (and if so, does this need to be noted on the ODP and/or the traffic assessment updated to reflect this), or will an application be made to stop it. If it is not to be included in the Plan Change area, please remove it from the ODP and update any relevant assessments that its exclusion may affect.

2. The land parcel is to be included. The ODP and Infrastructure plans have been amended to more accurately show this, and reference to the unformed legal road is inserted into the S32 document (revised version attached). The proposed rules already address the unformed portion of Runners Road, in so far as they require resource consents and assessments where any activity proposes access directly to Runners Road (the unformed portion). For example, see proposed Rules 17.2.3.5, 17.3.1.7, 17.3.9.5. It may well be that the applicant seeks to stop the road in due course, in which case the Runners Road rules will simply no longer be relevant.

Landscape and Visual Effects

Question 2: A preliminary review of the Urban Design, Landscape and Visual Impact Assessment (UDLVIA) prepared by DCM Urban Design Ltd has been undertaken by Bron Faulkner. To assist a better spatial understanding of the existing trees and the proposed planting and cycleway along the Two Chain Road boundary please provide a scaled cross-section. This will be useful to inform the total width required for the landscape treatment. The cross section should indicate the spatial requirements of the existing mature trees (allowing for canopy width) and the feasible location of the secondary planting, the proposed shared path and site boundary location. Please consider if it is appropriate for this cross-section to be included as part of the ODP.

3. An updated section is attached showing a 7.0m wide landscape strip immediately adjacent to the road boundary where existing vegetation will be retained. This allows for existing canopy width. This will be supplemented by an additional 3.0m wide strip



containing a single row of trees. The total width of the landscape strip will be 10.0m. There is sufficient space in the 40m wide road reserve for the shared path. It is not considered necessary for this cross section to be included in the ODP, the rule requirements are considered to be sufficiently clear as to the outcomes sought.

Question 3: It is not clear why there is no landscape treatment or mitigation proposed along the Walkers Road frontage or the railway reserve boundary. Ms Faulkner considers that mitigation of the scale proposed for Two Chain Road is required along the Walkers Road frontage, to screen the industrial activity from Walkers and Runner Roads, SH1 and nearby rural areas. Similarly, along the rail reserve boundary, existing trees on the state highway and railway land currently provide visual screening. However, consideration should be given to providing a buffer of trees within the site rather than reliance on mitigation located on neighbouring land. Please provide details (including a cross section as above) for planting along the Walkers Road and railway reserve boundaries to provide visual mitigation to areas beyond the Site.

4. The existing rules within the District Plan are considered to be sufficient to provide a suitable landscape treatment along both the Walkers Road and SH1 frontages. Passing motorists, pedestrians, cyclists or nearby properties are not considered sufficiently affected to warrant additional landscape treatment along these frontages. The Township rule C16.1.2.1 requires a 3m wide landscape strip (for an activity to be a permitted activity) to screen and soften the bulk of larger buildings and storage yards when viewed from public locations. These rules are specifically developed to provide the appropriate level of screening whilst still allowing for legibility of access points, passive surveillance, and will be the primary mitigating measure.
5. The landscape assessment does not rely on the existing planting on these frontages, outside of the site, as mitigation in the assessment, as it is considered that any adverse effects can be successfully mitigated, for the identified visually sensitive receivers, by the rule package provided by the Business 2A zoning. It is worth noting there are significant transport improvements proposed for the intersection of SH1 and Walkers Road which is likely to have an impact on existing planting in this location. Further, planting on the southern boundary of the site will need to be flexible, to allow for anticipated rail sidings and direct access from adjoining sites to the rail corridor for the transport of goods.
6. For the prison on Walkers Road, the prison site contains large buildings that are well set back (approximately 80m) from the road boundary, with views from the buildings orientated towards the internal prison site activities. The prison grounds are sparsely vegetated and dominated by security fences and lighting structures, with a macrocarpa hedge in between the buildings and the road. At this distance combined with the existing visual quality of the views, and with the proposed landscape rules from the Business 2A zoning, additional 'Landscape Treatment' along this frontage is not considered necessary.

Question 4: There appear to be nine rural residential properties on Two Chain Road opposite the site and others in close proximity of the Walkers Road intersection which are likely to be the most affected in terms of the changes to the rural character of the area and their rural amenity. The UDLVIA has considered the effects on visual amenity from representative viewpoints, including three properties, but has not specifically considered the effects on more holistic rural character and rural amenity that the local community currently experience amidst the Inner Plains zone. Visual amenity is just one contributor to overall rural amenity. The assessment is considered to accurately note that "The proposed development will modify the landscape from one that is semi-open and agricultural in character to one that is characterised by large scale industrial warehouse buildings, large areas of hardstand and landscape planting."¹ The nine rural residential properties on Two Chain Road opposite the Site (and near the Walkers Road intersection) currently experience a level of rural amenity contributed to by the relatively rural nature of Two Chain Road corridor and the



rural residential properties across the road (on the Site), which also serve as a buffer from SH1 and the railway line. The application proposes to substantially change the activity on both the Site and Two Chain Road to an industrial environment. As such the rural residential properties opposite the site will be at the interface of a new industrial zone. Please describe and assess the changes and magnitude of effects the proposal will have on the rural character and amenity for local residents of the Two Chain Road/Walkers Road given their current rural environment.

7. Additional assessment has been added to the assessment table (Table 2) of the updated Urban Design, Landscape, and Visual Impact Assessment (UDLVIA) to address all nine rural residential properties which could potentially be affected. All rural dwellings are well set back from the road boundary, nestled in their own landscaped domestic curtilage with established screening vegetation along the road boundary and they all currently have extensive rural views to the north across their own rural land which will ensure their most important outlook will remain rural in character. It is worth noting that mitigation measures are proposed along Two Chain Road to address concerns for these properties and effects on rural character. The changes to Two Chain Road are primarily upgrades of road standards and the introduction of a shared pedestrian cycle way. The amenity of the road will improve for users and the visual effects of industrial buildings on the existing dwellings will be well mitigated through the retention of the existing boundary vegetation and introduced secondary row of planting.
8. Effects in a more holistic sense on rural character and rural amenity have been addressed in Section 3 'Assessment of Effects' within the updated UDLVIA.
9. The Walkers Road frontage between SH1 and Two Chain Road is characterised by fencing (security) and planting (macrocarpa hedge planting) associated with the Rolleston Prison. See description and rationale above under Question 3.

Question 5: In relation to the above, UDLVIA notes that there "are several policies in the Rural Objectives and Policies of the Selwyn Operative District Plan which relate to Landscape Values and amenity which have been addressed in 3.3 below."2 The policies considered in section 3.3 relate to the Township Volume and do not address rural values or rural amenity. Please provide an assessment of the rural objectives and policies relating to landscape values and amenity.

10. The reference to rural policies in the UDLVIA is an error, it has been amended instead to refer to Township Objectives and Policies. As the proposal provides for a rezoning to urban use, the Rural objectives and policies for landscape values and amenity are not considered relevant. This is consistent with the approach taken in other recent plan change applications to the Selwyn District Plan.

Question 6: The following paragraph is included in the summary of effects on visual amenity:

'The bulk and form of the proposal is consistent with the character of the receiving environment and is considered an anticipated activity. Residents outlined above at 110 and 208 Two Chain Road are two rural residential properties. Both properties are set back from the road and have established vegetation and additional structures located between the property boundary and the main dwelling. Given the location of the proposal and the permitted baseline of surrounding activity, any adverse effects are considered to be less than minor.'

Please clarify this paragraph, particularly in relation to:

a) The first sentence referring to consistency with the character of the receiving environment, (which suggests the receiving environment is industrial in nature,) given that in page 10 of the report, the receiving environment is described as "a rural, semi open [environment] transiting to urban fringe peri urban."



b) The third sentence, which seems to assume the 'permitted baseline' is more industrial in nature than rural. In both cases, the urban aspects appear to have greater influence than the rural aspects of the receiving environment, despite the receiving environment being largely rural. Please clarify the basis for this.

11. This paragraph within Section 3.4.1 of the UDLVIA has been reworded but recognises that large buildings up to 12m in height can be constructed within the Inner Plains Rural zone. The Inner Plains Rural zone also allows for other activities which would change the current character to one which is much more developed.
12. The receiving environment is not considered Industrial at this point in time, but is not considered purely Rural either. Land use is mixed and the area is in a period of transition with typical rural characteristics becoming less prevalent. The PC site is connected to an existing industrial area, which forms part of the receiving environment along with the railway and road corridor (SH1). Infrastructure is well developed in the area, and with improvements (traffic related) to Two Chains Road to provide for greater vehicle (heavy) movements the character of the receiving environment is likely to continue to change.
13. The third sentence recognises that many activities permitted within the Inner Plains Rural zone are similar in character, (bulk and location) to those of the Business 2A zone.

Question 7: The following paragraph is included in the summary of effects on streetscape and users:

'Given the scale and character of the proposed development compared with the existing permitted baseline, negligible adverse effects are likely for streetscape users.'

Please explain the components of the 'permitted baseline' associated with the existing Inner Plains zone that are considered to be the same in scale and character to the development facilitated under the proposed Business 2A zoning; or reconsider the assessment of the change on the Two Chain Road corridor resulting from the rezoning.

14. This paragraph within Section 3.4.1 of the UDLVIA has been reworded. The magnitude of change has also been reviewed and revised where necessary. This notes that within the Inner Plains Rural zone buildings up to 12m height (grain silos up to 25m) with a site coverage up to 35% or 500m² can be constructed on sites less than 1Ha, or 5% site coverage on larger sites. A 20m setback is required along Two Chain Road for the principle building or dwelling but garages and accessory buildings can be within 10m of the road boundary. There are no controls on the placement of on-site carparks or storage yards in this location. As a point of comparison, the proposed Business 2A zoning buildings up to 15m (structures up to 25m) can be built as a permitted activity. Also, buildings are to be setback 10m from road boundaries.
15. As can be seen from the operative district plan rules, the building allowances and setbacks for Inner Plains Rural zone and Business 2A are not too dissimilar, though it is acknowledged that the extent of built coverage will be considerably higher in the Business 2A zone.

Question 8: The following sentence is included the third paragraph of the conclusions:

'In terms of landscape character and values of the area, subject to the mitigation measure proposed, the proposal will result in an acceptable magnitude of change on the existing rural landscape character and associated values.'



Please clarify:

a) what magnitude of effects (as per tables on page 7) equate to the term “acceptable magnitude of change”?

b) if, following the assessment of effects on rural amenity and character, (requested in 6 above) this conclusion would change.

16. The magnitude of change has been clarified in the updated UDLVIA with no change in the conclusion/assessment of effects on rural amenity or character.

Contaminated Land

Question 9: Environment Canterbury have undertaken a preliminary review of the PSI included in the application. They note that the site walkover identified a rubbish pit/ burn material and a diesel tank at 139 Two Chain Road. There are no photos or comments on the condition of the diesel tank, just that no staining was observed in the soil. Please clarify the location of these HAIL activities by plotting them on a map (which also allows for them be added to the LLUR).

17. Tetra Tech Coffey have provided an updated plan identifying the approximate location of the diesel tank and rubbish/burn pit, to confirm these locations. See Attachment A.

Question 10: Environment Canterbury also note that the PSI included a site walkover at 77 and 139 Two Chain Road, but that a large portion of the site was not visually inspected on site via a walkover. Looking at aerial imagery, there appears to be possible waste disposal to land or burn pile at 7 Two Chain Road that does not appear to have been addressed in this report. There may also be other HAIL activities blocked from view in the aerial imagery which would be identified by a site walkover. Please provide justification for not undertaking a site walkover of the remainder of the site, or provide an updated PSI that includes this.

18. Tetra Tech Coffey advise that access was only available to 77 and 139 Two Chain Road at the time of the preliminary investigation. The PSI report is a preliminary report designed to assess if a site will require additional work such as sampling of soils prior to any potential redevelopment of the site. The recommendations within the PSI state:

‘The site is considered to be suitable for plan change and subdivision, with any consent granted for the site, conditions on a detailed site investigation (DSI) being carried out prior to any earthworks and or building consents being granted. Tetra Tech Coffey recommends soil characterisation samples are taken from across the site with targeted samples at key areas such as former livestock dip locations to create a detailed site investigation (DSI) prior to earthworks consent being granted to ensure elevated contaminants and excessive use of pesticides are not present.’

19. The creation of a DSI for the site would include sampling of identified areas of contamination as well as a walkover of the entire site prior to and during these sampling activities. As such, Tetra Tech Coffey below that following the creation of the DSI, any contaminated land aspects within the site not identified within the initial PSI report will have been investigated and quantified by sampling.

Transport

Question 11: Please confirm the intended roading hierarchy for the anticipated frontage upgrades for Walkers Road and Two Chain Road, referencing Council’s Engineering Standards and Guidelines where relevant, that are needed to support the plan change. Please note this information does not need to include detailed cross sections.



20. Two Chain Road is an *Arterial Road* and it is proposed that the upgrade would be consistent with the requirements of the District Plan. It is noted that:
 - a. the Plan Change site only proposes up to three intersections to this road and no direct vehicle access to individual sites is proposed (i.e., there are no vehicle crossings); and
 - b. the land on the northern side of Two Chain Road (opposite the Plan Change site) is zone Inner Plains and is typically either rural in nature, or rural residential.
21. Given the above, the design standard would be of a *Rural Arterial Road*. The District Plan only requires a carriageway of between 7.5m and 9.0m width in a road corridor width of 20m.
22. The proposed cross-section would be consistent with the above requirement, although it would also include a shared path on the southern side of the road that would nominally be 3.0m to 4.0m wide (to be agreed with Council and Waka Kotahi as part of detailed design). There would also likely be right turn bays provided on Two Chain Road to accommodate turning into the Plan Change site at the proposed intersections.
23. Walkers Road is also an *Arterial Road*, although the Rolleston Prison on the western side of the road and the proposed Plan Change site on the eastern side (along with proposed property accesses) mean this would become an *Urban Arterial*.
24. The proposed cross-section would include two traffic lanes plus a flush median to facilitate property access and a shared path on the eastern side of the road that would nominally be 3.0m to 4.0m wide (to be agreed with Council and Waka Kotahi as part of detailed design). The provision of on-street car parking and a footpath on the western side of the road is anticipated to be resolved through liaison with Council and Rolleston Prison, as there may be security reasons that these facilities are undesirable. In our opinion, there would be safety and efficiency merit to exclude kerbside or roadside parking in this location, noting that the speed limit along this road is likely to remain high. That said, car parking could still be accommodated within the 20m road corridor (if required).
25. Note that the requirement for a flush median was included in ODP amendments to Rule 22.9 part b.

Question 12: Please provide further discussion on the potential safety and efficiency effects, and any required mitigation measures (including potential staging of development), should development within PPC80 proceed the upgrades programmed by:

- a. *Upgrade of Two Chain Road / Walker Road intersection to a roundabout (Council project for 2028/2029)*
 - b. *Walkers Road / Runners Road intersection, including the level rail crossing (potentially within NZUP but not confirmed)*
 - c. *Upgrade / realignment of Two Chain Road / Wards Road intersection, including level rail crossing improvements (Council project for 2028/2029).*
26. Prior to undertaking the requested assessments, **Table 1** sets out the proposed timing of infrastructure upgrades and anticipated funding mechanisms for the critical transport



upgrades that this Plan Change site relies upon. This is intended to provide clarity on timing and responsibility for these upgrades.

Table 1: Transport Network Upgrades

Upgrade Required	Timing	Anticipated Funding Mechanism
SH1 / Dunns Crossing Road / Walkers Road Intersection	Prior to occupation of any building in the ODP area.	Works already funded by Waka Kotahi
Walkers Road Upgrades along Site Frontage	Prior to occupation of any building in the ODP area.	Developer funded (as not in the LTP ¹)
Walkers Road intersection with Runners Road and rail crossing	Prior to occupation of any building in the ODP area.	Works already funded by Waka Kotahi
Walkers Road / Two Chain Road Roundabout	-	Funded in the LTP for 2028/29.
Two Chain Road Site Frontage Upgrades	Prior to occupation of any building in the ODP area.	Developer agreement, as upgrades are proposed in the LTP but not until 2028/29.
Two Chain Road widening & Jones Road/Wards Road realignment (other than the road site frontage upgrades above)	Prior to occupation of any building in the ODP area.	Funded in the LTP in 2028/29, although this may be accelerated through the Waka Kotahi southern access proposed to the industrial areas (or else in agreement with the Developer and Council).

Two Chain Road / Walker Road Intersection

27. The traffic modelling of the Plan Change identified that the Walkers Road / Two Chain Road intersection would operate better with the Plan Change than without. This is because traffic is predicted to travel through the Plan Change site rather than use the Walkers Road / Two Chain Road intersection. The construction of a primary road network link between Two Chain Road and Walkers Road is required to be completed prior to occupation of any building within the Plan Change site to ensure that traffic is able to avoid the Walkers Road / Two Chain Road intersection.
28. The traffic model results indicate the following volumes through this intersection:
 - a. AM Peak Base Model: 871 to 919 vehicles per hour;
 - b. AM Peak with Plan Change Model: 735 to 738 vehicles per hour;
 - c. PM Peak Base Model: 953 to 962 vehicles per hour; and
 - d. PM Peak with Plan Change Model: 732 to 770 vehicles per hour.
29. The above indicates that the traffic volumes through the intersection drop as a result of the Plan Change. This is because traffic is routing through the Plan Change road network and avoiding the intersection. No restraint on timing is proposed for the Plan

¹ Selwyn District Council Long Term Plan.



Change given traffic reduces at this intersection as a result of establishing the Plan Change site.

Walkers Road / Runners Road Intersection

30. It is assumed that the Walkers Road / Runners Road intersection and the level crossing would be improved either as part of the NZUP project, or as part of the upgrade for Walkers Road noting that this would need to satisfactorily tie-in with the existing road network.

Two Chain Road / Jones Road / Wards Road Intersection

This is proposed to be upgraded prior to occupation of any building in the ODP area, per Table 1 above.

Question 13: Please provide the SIDRA model files for the State Highway 1 / Dunns Crossing Road / Walkers Road intersection, that have been used for the assessment included in the ITA.

31. These have been provided via email direct to Flow on 20 December 2021.

Question 14: Please provide further explanation of how the vehicle trip rates used in the ITA are consistent with PC10.

32. The traffic generation rates set out in the Plan Change 10 ITA includes rates for Bulk Retail and for General Warehousing because that Plan Change included a Large Format Retail zone as well as Business 2A zone. It is noted that the Bulk Retail traffic generation rate was higher in the PM Peak (compared to the AM peak), whereas the industrial generation rates were higher in the AM peak (compared to the PM peak) and it is assumed that this combination of retail and industrial activity within Plan Change 10 led to the more even traffic generation for that proposal.
33. Plan Change 80 only proposes an Industrial Zoning, so only the general warehousing rates have been applied to this assessment, with the traffic generation rates indicating a lower traffic generation in the PM compared to the AM.

Question 15: Please provide further assessment of the effects on the shared use path on SH1, scheduled for construction by Waka Kotahi, and how the proposed diversion onto Walkers Road and Two Chain Road will affect cyclist journey times and accessibility.

34. **Figure 1** illustrates the current route of the proposed shared path and the route proposed as part of the Plan Change application. The distances between the common start and end points (the Walkers Road / Runners Road intersection and the Jones Road / George Holmes Road intersection) is 2.7km along the planned route and 3.3km along the Plan Change route.

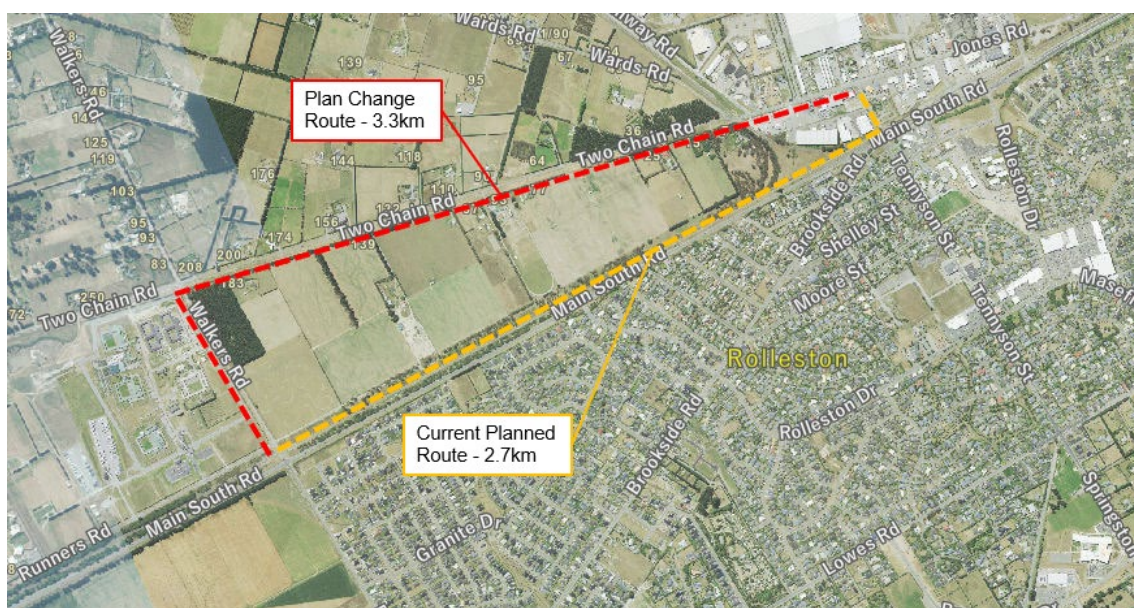


Figure 1: Current & Plan Change Shared Path

35. The time taken to travel the additional 600m with the Plan Change route at a nominal speed of 20km/hr is less than two minutes. Whilst it is acknowledged that there would be some additional time to cross intersections, only up to three intersections are permitted to Two Chain Road and a practical limit of two intersections (at most) to Walkers Road². As such the additional time taken to cross the intersections is not anticipated to be significant.
36. This two-minute increase in journey time would need to be seen in the context of a longer journey that leads people from their origins to their destinations, meaning the percentage increase in journey time will lessen as trips get longer. There are also the benefits of locating employment within close proximity to the existing and proposed residential areas at the western end of Rolleston, which makes cycling to work a more attractive proposition.
37. Furthermore, the purpose of relocating the shared path is to facilitate the potential for rail sidings, which has the benefit of reducing the reliance on road freight. Whilst this is not a direct benefit to cycling, there are wider transport benefits associated with the reduced reliance on road freight.
38. Overall, it is considered that the additional journey time associated with relocating the proposed shared path is not significant and there are wider transport gains achieved through access to rail by undertaking this alteration.

Question 16: Please provide further assessment of the requirement for cycle facilities on internal roads, including reference to relevant Council Standards and Guidelines where relevant.

² This is based on Walkers Road becoming an Arterial Road. If the speed limit were reduced to 50km/hr there would be a required intersection spacing of 160m, meaning two additional intersections could be created between Two Chain Road and Runners Road. If the speed limit were to be above 50km/hr the intersection spacing requirement is such that only one new intersection could be located within this segment of Walkers Road.



39. As set out in the ITA, it is agreed that the internal Primary Road network will be designed to include on-road cycle facilities.

Question 17: I recommend that the applicant revise the labelling of Appendix 3 and 4 of the ITA.

40. An updated version of the ITA is attached with the correct appendices.

Additional Traffic Comment: whether a planning mechanism should be provided to discourage direct lot access onto Walkers Road and Two Chain Road (comment from Flow Transportation Specialists Technical Note dated 5 Nov 2021 under 3.1.1 – page 6, not from SDC RFI dated 9 Nov 2021)

Two Chain Road

41. No direct property access is proposed to Two Chain Road. The mechanism for this is set out in the proposed amendments to Rule 17.2 and 17.3. Although this only makes access to Two Chain Road a restricted discretionary activity, this is consistent with District Plan measures regarding access to Maddisons Road. This still provides Council with the ability to not approve access to Two Chain Road if they choose to do so.

Walkers Road

42. Direct property access is proposed to Walkers Road, although this is proposed to be mitigated to some degree through the provision of a flush median. Furthermore, there are a range of Rules in the District Plan (Operative and Proposed) that require assessment of accesses to Arterial roads. These include:
- a. Rule 17.3.1.5 of the Operative District Plan, which effectively limits the traffic generation to an Arterial Road to 100 equivalent car movements per day and requires an assessment of safety and efficiency effects above this threshold;
 - b. Rule 17.3.6 of the Operative District Plan requires an assessment of safety and efficiency effects (for all road users) for an activity that generates greater than 250 vehicle movements per day;
 - c. TRAN-R4 of the Proposed District Plan requires an assessment of safety and efficiency effects (for all road users) for an activity that generates greater than 250 vehicle movements per day;
 - d. TRAN-R8 of the Proposed District Plan requires an assessment of high trip generating activities with thresholds set around 50 vehicles per hour or 250 heavy vehicle trips per day; and
 - e. TRAN-REQ2 of the Proposed District Plan requires an assessment where the activity generates 100 (or more) equivalent car movements per day.
43. In addition to the above, there are further rules and standards that set out additional matters regarding the design, location and number of vehicle crossings permitted that would also provide Council with control over the acceptability of the proposed crossings and the volume of traffic generated by the activities they serve.
44. The combination of the flush median on Walkers Road, the requirement for assessment with reasonably low thresholds (100 equivalent car movements per day); and the standards regarding access design indicate that access to Walkers Road would either



need to have negligible effects to be permitted or would need to confirm that the effects would be acceptable. Given the level of discretion enabled by the Operative and Proposed District Plan Rules, we consider that access to Walkers Road would be acceptable and that unacceptable effects would be filtered out through the Resource Consent process.

I recommend that the applicant engages with Waka Kotahi and Kiwi Rail regarding the proposed rail sidings. (comment from Flow Transportation Specialists Technical Note dated 5 Nov 2021 under 3.4.1 – page 9, not from SDC RFI dated 9 Nov 2021)

45. Discussions regarding the potential rail sidings are proposed to take place once a Plan Change has been approved and potential tenant details are known so suitable sidings can be developed that meet their needs.

Ecology

Question 18: please provide an ecological assessment of the potential wetland areas identified in the ecology report, using appropriate protocols for wetland assessment, comparison against appropriate ecological significance criteria, and discuss what mitigation measures are needed to protect the wetlands from potential adverse effects of the proposed land use change facilitated by the rezoning.

46. Please see attached letter, Attachment E.

Wastewater

Question 19: Two options have been provided in the WSP report to convey wastewater to the Selwyn District Council network. Since this work was completed, an additional discharge location has potentially become available. Council is currently constructing a wastewater pipeline between Darfield and the Pines WWTP and a tee will be added into this line at the corner of Aylesbury Rd and Runners Rd and another at the corner of Aylesbury Rd and Two Chain Rd. Please advise if the development be viable if it were to pump to either of these two proposed tees?

47. The proposed development could potentially discharge to either of the discharge points along Aylesbury Road as proposed by Council. Furthermore, there are other options to service the site with wastewater such as a rising main constructed directly to the Pines WWTP (3.0km) or discharge to the George Holmes pump station as recommended in the WSP wastewater assessment. Regardless, the proposed development can be serviced for wastewater and the most appropriate option for the site can be determined during the subdivision design alongside Council.

Water

Question 20: As the township of Rolleston grows the consented allocation of water will be put under pressure. To ensure that growth is appropriately integrated with the provision of infrastructure, and planned growth is able to be serviced, Council considers that the priority of water allocation needs to be given to those developments within the Rolleston Structure Plan area. To enable the provision of water to this development, please advise if there is any consented water that can be transferred to Council? If not, could the Request be amended to limit the type of industry to low water uses such as warehousing?

48. There are no water-take consents for any of the land within the proposed plan change area that could be transferred to Council. The plan change request could be amended to limit the type of industry to low water uses if required. But if, for example, a wet-



processing industry were to be established, it would be up to the new landowner to apply for their own water take consent and establish their own source should this be required.

Economic Impacts

Question 21: The economics assessment states that the applicant “wishes to create the opportunity for a range of industrial activities consistent with the provisions of the Selwyn District Council’s B2A provisions which allow for a range of industrial activities, service stations and trade suppliers with limited residential and retail activity which is related to industrial uses.” The requested B2A zone provides for a diverse range and large amount of retail space. While the applicant has indicated a preference for industrial use, it is possible that (at least some of) the site could be used for non-industrial uses, and that a potentially large amount of retail and services space could establish on the site. Please provide an assessment of the potential effects of non-industrial activities, in particular retail and commercial activities, establishing on the site, including potential effects on the Rolleston and Lincoln Key Activity Centres. It would assist evaluation of the merits of the proposal if the assessment could provide an opinion as to whether any limitation on non-industrial activities such as was proposed by the processing planner in Plan Change 66 (Rule 22.10.4), is similarly necessary for this plan change area.

49. For simplicity, Rule 22.10.4 has been amended to also apply to the Plan Change 80 site. Refer amended Section 32 report, attached as Attachment B.

Question 22: The Request refers to there being an identified shortage of land within Greater Christchurch. Reference is made to evidence presented at the Plan Change 66 hearing to support this. For the ease of parties reviewing this Request, please provide a summary of the key points, reasoning and conclusions reached in this evidence that are relevant to this Request.

50. Evidence was provided in support of PC66 by Messrs Nick O’Styke (Director, Industrial Sales, Bayleys Canterbury) and Sam Staite (Industrial Broker, Colliers Christchurch), regarding the shortage of industrial land in Greater Christchurch. In summary, the evidence of those experts was:
- Freehold industrial land in Greater Christchurch, and in particular in Selwyn, is in high demand. While there may be land that is ‘zoned’ industrial, practically speaking, that does not mean there is sufficient freehold industrial land supply to meet current demand;
 - The majority of the current market for industrial land is seeking an owner occupier arrangement which there is currently a real shortage of. This demand is reflected in the significant increase in industrial list values over the last few years;
 - Based on the constraints of many of the existing industrial sites in Greater Christchurch, demand is anticipated to substantially outweigh supply for freehold unencumbered industrial land long before 2048;
 - Christchurch, and particularly Rolleston (being an extremely attractive location for industrial land investors), is very close to an acute shortage of industrial unencumbered, freehold land.

Question 23: The Request also refers to there being high levels of demand for industrial land proximate to the main rail corridor and State Highway 1. Please provide further details to support this statement.

51. Please refer to the RFI response to item #22 which provided a summary from Plan Change 66 of not only the shortage of suitable industrial land, but also shows the high



level of interest from industrial related businesses to be close to both State Highway 1 and the main rail corridor. Furthermore, IPort Business Park which has land close to both State Highway 1 and the main rail corridor has within the last calendar year (January 2021 to January 2022) seen land sales of approximately 11.5 ha, along with another 6.6 ha of land either under contract or under offer. Additionally, there have been discussions with large logistics operators who are very interested in the location (being proximate to the State Highway 1 and main rail corridor) which are evaluating their property needs within the year of 2022 and are likely to consider to invest in Rolleston.

NPS-UD

Question 24: The Request identifies that the NPS-UD is relevant to this Plan Change and identifies those objectives and policies that are considered relevant to the plan change. However only a brief assessment is provided of why the application is considered to be consistent with the NPS-UD. Provide a more detailed assessment of the PC against each of the provisions of the NPS-UD that are relevant.

52. There are a range of matters that need to be considered or had particular regard to, in order to determine if PC80 gives effect to the NPS UD. They include the following matters set out in the objectives and policies of the NPS:

<i>Provision</i>	<i>Comment</i>
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	I address well-functioning urban environment below.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-served by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	Clause (a) is a more relevant consideration to residential growth, but PC80 adjoins Rolleston, an existing area with employment opportunities. Those opportunities are anticipated to grow as a result of PC80. An existing public bus routes adjoins the site on Two Chain Road, with potential for further routes in the vicinity as demand grows. Per evidence provided by Mr Staite and Mr O'Styke's at the PC66 hearing (and summarised above), there is high demand for industrial greenfield land in the Rolleston area.



Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	Consultation with runanga is being undertaken. No site specific cultural sensitivities are currently known.
Objective 6: Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	Infrastructure has been considered and confirmed as available to the site. The landscape and visual assessment (Appendix C to the Section 32 Report) has confirmed that the site is a natural and in sequence direction of growth for industrial areas in Rolleston township and will support a consolidated urban form. The site is not currently identified in any Council or ECan long term planning strategies. The proposal will provide significant development capacity (addressed further below).
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	Previous evidence on PC66, as summarised above, has indicated that the information held by Selwyn District in regard the availability of industrial business land in the District is outdated and insufficiently robust.
Objective 8: New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	The potential for reliance on rail for freight transport, whether by a rail siding extension or by the very short distance to existing rail infrastructure near the site, will assist with reducing greenhouse gas emissions. Climate change effects from increased severity and frequency of storms can be appropriately managed on site.
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: ...	Addressed below.



<p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>The proposal will provide additional capacity to meet expected demand for business land.</p>
<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and</p> <p>(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and</p> <p>(c) building heights of least 6 storeys within at least a walkable catchment of the following:</p> <p>(i) existing and planned rapid transit stops</p> <p>(ii) the edge of city centre zones</p> <p>(iii) the edge of metropolitan centre zones; and</p> <p>(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:</p> <p>(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p> <p>(ii) relative demand for housing and business use in that location.</p>	<p>This policy is of lesser relevance to PC80. Existing height and density rules for the Business 2A zone are considered to be appropriate for PC80.</p>
<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p>	<p>The operative District Plan is not considered to have wholly given effect to this NPS. The proposed District Plan is not sufficiently progressed yet to confirm that it</p>



<p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>has appropriately given effect to the NPS.</p> <p>(b) the proposal will represent a change to the Rolleston township, in so far as the urban-rural boundary will be pushed west of where it currently sits north of SH1, bringing the urban-rural interface closer to properties that will not experience change on their boundaries.</p> <p>The question of a well-functioning urban environment is addressed below.</p> <p>In regard (d), the principal relevant contribution that the PC80 site will make to providing development capacity is in respect of providing further industrial land adjacent the state highway and rail infrastructure.</p> <p>As above, climate change effects are able to be managed on the site.</p>
<p>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <p>(a) unanticipated by RMA planning documents; or</p> <p>(b) out-of-sequence with planned land release.</p>	<p>The development is unanticipated insofar as it is currently a rural zoned site; and is not currently identified as a Greenfield Priority Area in the CRPS. Development capacity and the urban environment are addressed below.</p>
<p>Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p>	<p>As above, engagement with runanga in respect of the development of the site for urban purposes has been completed, per the attached report from MKT</p>



<p>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</p> <p>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</p> <p>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</p> <p>(d) operate in a way that is consistent with iwi participation legislation.</p>	<p>(Attachment F). Further opportunities for runanga involvement will be afforded more generally through the public submission process.</p>
---	---

53. In our view, the key considerations of the NPS UD in respect of Plan Change 80 are:

- i. Will the Proposal provide 'significant' development capacity (Objective 6, Clause 3.8);
- ii. Will the Proposal contribute to a well-functioning urban environment (Objective 1, Policy 1, Policy 6, Clause 3.8, Clause 3.11);
- iii. Is the site able to be adequately serviced with infrastructure (Objective 6, Policy 10, Clause 3.5); and
- iv. Is it well-connected along transport corridors (Clause 3.8).

54. Additional to that is the question of whether the Proposal meets the CRPS criteria for determining what plan changes will be treated as adding significantly to development capacity. However, that criteria does not yet exist and so is not a consideration for this Proposal.

Significant Development Capacity

55. Development capacity is addressed in paragraph 96(i) of the Section 32 Report, noting that:

'The existing area of Business 2A zoning in Selwyn District is all in Rolleston and is 342ha. Proposed Plan Change 66 (PC66) will add a further 27ha of Business 2A



zone land if it is successful, providing for a total Business 2A zoning of 369ha. The proposed plan change will provide a further 26.5% increase in Business 2A zone within Selwyn District. The existing combined area of Business 2A and Business 2 zoning in Rolleston, if PC66 is included, is 414ha. The proposed extension is a 23.7% increase to that zoning. The proposal will provide an additional 98ha of industrial zone land at Rolleston, which is experiencing very high levels of demand for industrial land proximate to the main rail corridor and State Highway 1 (in effect, a freight hub). The proposal is also anticipated to include large areas of unencumbered freehold land, of which there is an identified shortage within Greater Christchurch’.

Well-Functioning Urban Environment

56. This matter is addressed in paragraphs 39-41 of the Section 32 Report, which concludes in paragraph 41 that:

‘...the proposed plan change is considered to provide an appropriate standard of urban design and urban form and contribute to well-functioning urban environments as sought by the National Policy Statement on Urban Development (NPS-UD).’

Infrastructure

57. As confirmed by the Infrastructure Report attached as Appendix A to the Section 32 Report, the site is able to be adequately serviced.

Transport Connections

58. With the site’s proximity to the State Highway and north-south rail corridor, and noting the deferral of development until such time as certain transport upgrades are undertaken, the site is considered to be well connected to transport corridors.
59. In summary, it is considered that the Proposal will give effect to the NPS-UD, and it is appropriate for Council to be responsive to this plan change application, per Objective 6 and Policy 8 of the NPS UD.

Proposed District Plan

Question 25: 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 an assessment of the request against the relevant provisions of the Proposed District Plan, and in particular those provisions that have immediate effect.

60. The proposed Selwyn District Plan (‘proposed plan’) was notified on 5 October 2020 and submissions closed in December 2020. The proposed plan is still subject to hearings, decisions, and appeals. It is further noted that two submitters³ have filed submissions on the proposed plan seeking rezoning of the land to General Industrial. Accounting for the above, limited weight should be afforded to the provisions of the proposed plan at this

³ DPR-0392 and DPR-0137.



time. Notwithstanding, an assessment of those provisions in the proposed plan of particular relevance is provided below in Table 1.

Table 1: Assessment of the proposal against the provisions of the pSDP

PSDP Provision	Comment / Assessment
<p><i>Sensational Selwyn</i></p> <p>SD-DI-O1</p> <p><i>Selwyn is an attractive and pleasant place to live, work, and visit, where development:</i></p> <ol style="list-style-type: none"><i>1. takes into account the character of individual communities;</i><i>2. is well-connected, safe, accessible, and resilient; and</i><i>3. enhances environmental, economic, cultural and social outcomes for the benefit of the entire District.</i>	<p>Through its layout, edge treatment and connectivity the proposal provides for development that accounts for the characteristics of the local community and its position at the urban/rural interface.</p> <p>Similarly the ODP provides for well-connected, safe and accessible development, and the technical assessments have demonstrated that the development will be resilient to natural hazards.</p> <p>Finally, the assessments have demonstrated the positive environmental, economic, and social outcomes of the proposal, and the avoidance of adverse effects.</p>
<p>SD-DI-O2</p> <p><i>Selwyn's prosperous economy is supported through the efficient use of land, resources, and infrastructure, while ensuring existing activities are protected from incompatible activities.</i></p>	<p>The proposal provides for an efficient use of land and infrastructure (particularly accounting for the existing adjoining infrastructure) and avoids conflict with any existing incompatible activities.</p>
<p><i>Integration and Land Use, Ecosystems, and Water - Ki Uta Ki Tai</i></p> <p>SD-DI-O3</p> <p><i>Land and water resources are managed through an integrated approach, which recognises both the importance of ki uta ki tai to Ngāi Tahu and the inter-relationship between ecosystems and natural processes.</i></p>	<p>The technical assessments have demonstrated that development can occur in a manner consistent with this objective.</p>
<p><i>Our Environment</i></p> <p>SD-DI-O4</p> <p><i>Places, landscapes, and features which are significant to Selwyn's character, cultural heritage, or are of spiritual importance to Ngāi Tahu, are identified, recognised for their values, and protected for future generations.</i></p>	<p>The subject land is not subject to any significant values and noting the visual/urban design assessment attached to the Section 32 Report, therefore the proposal is consistent with this objective.</p>
<p><i>Vibrant and Viable Centres</i></p> <p>SD-DI-O5</p> <p><i>Selwyn's hierarchy of activity centres are the preferred location for shopping, leisure, cultural, entertainment, and social interaction experiences in accordance with their anticipated role within the Activity Centre Network.</i></p>	<p>The proposal will further support the Rolleston town centre, including by limiting the extent of retail activity that can locate within the proposed zone.</p>
<p><i>Community Needs</i></p> <p>SD-IR-O1</p> <p><i>The important infrastructure needs of the community are fulfilled, and their operation is protected.</i></p>	<p>Per the Inovo assessment the proposal is able to be supported by infrastructure, and will not otherwise compromise the continued operation of community infrastructure.</p>
<p><i>Effects of Important Infrastructure</i></p> <p>SD-IR-O2</p> <p><i>The development, upgrade, maintenance, and operation of all important infrastructure is enabled in a way that minimises</i></p>	<p>As noted above, the proposal will not adversely affect important infrastructure.</p>



adverse effects, while having regard to the practical constraints and the logistical and technical practicalities associated with important infrastructure.

Natural Hazards

SD-IR-O3

The risk from natural hazards, including the effects of climate change, to people, property, and important infrastructure is not increased, other than where necessary to provide for important infrastructure that has no reasonable alternative.

The proposal will not be subject to unacceptable hazard risks.

Partnership with Ngāi Tahu

SD-MWV-O1

Strengthen the partnership between the Council and Ngāi Tahu by recognising the cultural significance of Selwyn to Ngāi Tahu and Te Taumutu and Ngāi Tūāhuriri Rūnanga by:

- 1. Promoting active and meaningful participation by those who hold mana whenua in the resource management decision-making process;*
- 2. Recognising that only those who hold mana whenua can identify their relationship with their culture, traditions, ancestral lands, waterbodies, wāhi tapu and other taonga;*
- 3. Enabling the exercise of kaitiakitanga by those who hold mana whenua over Selwyn;*
- 4. Providing for the contemporary connections, cultural and spiritual values held by tāngata whenua; and*
- 5. Continuing to enable tāngata whenua to protect, develop and use Māori Land in a way which is consistent with their culture, traditions and aspirations.*

Consultation with mana whenua has commenced.

Compact and Sustainable Township Network

SD-UFD-O1

Urban growth is located only in or around existing townships and in a compact and sustainable form that aligns with its anticipated role in the Township Network, while responding to the community's needs, natural landforms, cultural values, and physical features.

The proposal is located 'around existing townships' and is in a 'compact and sustainable form'.

Urban Growth and Development

SD-UFD-O2

There is sufficient feasible development capacity to meet anticipated demands for housing and business activities.

Consistent with the directions in policy 2 of the NPS-UD to provide 'at least sufficient development capacity to meet expected demand', the proposal supports the provision of 'sufficient feasible development capacity to meet anticipated demands for housing'.

Integration of Land Use and Infrastructure

SD-UFD-O3

Urban growth and development:

- 1. is well-integrated with the efficient provision, including the timing and funding, of infrastructure; and*
- 2. has the ability to manage or respond to the effects of climate change.*

The Inovo assessment demonstrates consistency with this objective insofar as it relates to infrastructure; and the hazards assessment has otherwise confirmed that the effects of climate change can be readily managed by the proposal.

TRAN-O1

People and places are connected through safe, efficient, and convenient land transport corridors and land transport infrastructure which is well integrated with land use activities and subdivision development.

The transport assessment and further information has demonstrated consistency with these provisions and supporting policies.



TRAN-O2

Land transport corridors and land transport infrastructure are protected from incompatible land use activities and subdivision development.

TRAN-O3

Land transport corridors and land transport infrastructure support the needs of people and freight, while ensuring adverse effects on the surrounding environment from their establishment and operation are managed.

CL – Contaminated Land

NH – Natural Hazards

HAZS- Hazardous substances

For completeness, it is noted that contaminated land and natural hazards matters have been assessed and there are no associated implications or effects for the proposed Plan Change.

The plan change site is not subject to any risks associated with hazardous substances.

HH – Historic Heritage

TREE - Notable Trees

SASM – Sites and Areas of Significance to Māori

There are no heritage items on the site.

There are no notable trees on the site.

There are no sites or areas of significance to Māori on the site.

EIB-O1

Indigenous biodiversity within the district is managed through the exercise of kaitiakitanga and stewardship, in order that:

- 1. Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected to ensure no net loss of indigenous biodiversity, and*
- 2. Other indigenous biodiversity values are maintained and enhanced, and*
- 3. The restoration and enhancement of areas of indigenous biodiversity is encouraged and supported.*

The AEL assessment (Appendix G to the Section 32 Report) demonstrates that there is little indigenous vegetation on the request site. The request provides the opportunity for indigenous species to be established along riparian margins to improve the aquatic habitat for indigenous fauna.

NATC-O1

The natural character of surface water bodies and their margins is preserved.

NATC-O2

The relationship of tangata whenua and their traditions, values and interests associated with water bodies are recognised and provided for.

As above, the margins of the existing water race through the site would be protected and enhanced with the subdivision of the site. As no natural waterbodies are present on or immediately adjoining the site, esplanade reserves are not anticipated to be required.

NFL - Natural Features and Landscapes

For completeness, it is noted that this attribute is not applicable to the Plan Change site.

PA-O1

Selwyn's community has access to and along the District's surface water bodies and coastal marine area.

There are no natural water bodies within the site nor does the site adjoin the coastal marine area.

SUB-O1

Subdivision design and layout maintains or enhances the amenity values of the zone.

These provisions and associated policies and rules would readily apply to the land following rezoning, and the proposed Plan Change does not present any inconsistency.

SUB-O2



Every site created by subdivision has the characteristics, infrastructure, and facilities appropriate for the intended use of the land.

SUB-O3

Site sizes reflect the anticipated development outcomes of the zone.

ASW - Activities on the Surface of Water

CE - Coastal Environment

EW - Earthworks

LIGHT - Light

NOISE - Noise

SIGN - Signs

TEMP - Temporary Activities

For completeness, it is noted that none of these attributes are applicable to the Plan Change (albeit they may apply to future activities on the land).

UG-Overview

The Selwyn District is a desirable place to live, work, and play, which is generating a demand for housing and business opportunities to support the needs of the growing community now and into the future. The Urban Growth chapter assists in meeting these demands by encouraging a consolidated and compact settlement pattern that optimises the use and development of resources. This chapter also assists in ensuring there is enough urban development capacity available to meet the District's housing and business needs while assuring that high quality living and business environments continue to be developed to implement the adopted Development Plans.

Ongoing urban development capacity is provided through the identification of new urban areas that are subject to the Urban Growth Overlay and by enabling existing sites to be intensified or redeveloped. The need for zoning processes to demonstrate consistency with all of the urban growth policies and to consider relevant Development Plans will ensure that new urban growth areas do not conflict with legitimately established land use activities, compromise the quality of the environments that people value, and result in adverse environmental effects.

The intensification of activities and redevelopment of existing land within urban zones is encouraged to support the District's urban growth needs. This includes through increased housing densities and the development and implementation of Urban Intensification Plans and Development Plans to achieve integrated settlement patterns and to complement the ongoing provision of new urban areas.

The Urban Growth Overlay maps the spatial locations identified in Development Plans that have been adopted by SDC. These assist in determining where new urban areas can locate around townships and delivering the outcomes that are anticipated to be achieved within these environments. Any urban development or subdivision of land outside of the existing township boundaries is precluded unless the urban growth policies have been fulfilled through the zoning process under Schedule 1 of the RMA.

The General Rural Zone activity-based rules apply to the land that is subject to the Urban Growth Overlay to enable the majority of rural land uses to continue. Additional rules apply to ensure that land use and subdivision development does not undermine the future zoning or development of the land that will assist in meeting the growth needs of the district. All other

The Urban Growth overview recognises the 'demand for housing and business opportunities to support the needs of the growing community now and into the future' and the need to ensure 'there is enough urban development capacity available to meet the District's housing and business needs'. The Plan Change proposal responds to these demands and supports the provision of sufficient development capacity for industrial business.

The plan change proposal otherwise 'demonstrates consistency with all of the urban growth policies' and 'does not conflict with legitimately established land use activities, compromise the quality of the environments that people value, and result in adverse environmental effects'.



site-specific rules to achieve the urban growth outcomes will be determined through the zoning process.

UG-O1

Urban growth is provided for in a strategic manner that:

1. Achieves attractive, pleasant, high quality, and resilient urban environments;
2. Maintains and enhances the amenity values and character anticipated within each residential, kainga nohoanga, or business area;
3. Recognises and protect identified Heritage Sites, Heritage Settings, and Notable Trees;
4. Protects the health and well-being of water bodies, freshwater ecosystems, and receiving environments;
5. Provides for the intensification and redevelopment of existing urban sites;
6. Integrates with existing residential neighbourhoods, commercial centres, industrial hubs, inland ports, or knowledge areas;
7. Is coordinated with available infrastructure and utilities, including land transport infrastructure; and
8. Enables people and communities, now and future, to provide for their wellbeing, and their health and safety.

The proposed plan change and supporting assessments have demonstrated that the proposal will:

1. Deliver an attractive, pleasant, high quality, and resilient urban environment;
2. Maintain and enhance the amenity values and character anticipated within the business area;
3. Integrate with the existing industrial hub to the east and commercial centres;
4. Be well coordinated with available infrastructure and utilities, including land transport infrastructure; and
5. Enable people and communities, now and future, to provide for their wellbeing, and their health and safety.

UG-O2

Townships maintain a consolidated and compact urban form to support:

1. Accessible, sustainable and resilient residential neighbourhoods, commercial centres, industrial hubs, inland ports, or knowledge areas;
2. The role and function of each urban area within the District's Township Network and the economic and social prosperity of the District's commercial centres; and
3. The efficient servicing of townships and integration with existing and planned infrastructure.

As demonstrated in the urban design, servicing and transport assessments, the urban form (and ODP) proposed for the Plan Change supports:

1. Accessible, sustainable and resilient industrial hubs;
2. The role and function of the Rolleston urban area and the District's commercial centres; and
3. Efficient servicing of townships and integration with existing and planned infrastructure.

UG-O3

There is sufficient feasible housing and sufficient business development capacity within Greater Christchurch to ensure:

1. The housing bottom lines are met;
2. A wide range of housing types, sizes, and densities are available to satisfy social and affordability needs and respond to demographic change; and
3. Commercial and industrial growth is supported by a range of working environments and places to locate and operate businesses consistent with the District's Activity Centre Network.

As noted above, this provision (and the NPS-UD) seeks sufficiency (i.e. a minimum rather than maximum) supply of business development capacity which the proposal will support.

The plan change otherwise supports industrial growth by a 'range of working environments and places to locate and operate business consistent with the District's Activity Centre Network'.

Urban Growth

UG-P1 Spatially identify new urban growth areas supported by a Development Plan.

UG-P2 Provide for the rezoning of land to establish new urban areas within the Urban Growth Overlay.

UG-P3 Avoid the zoning of land to establish any new urban areas or extensions to any township boundary in the Greater Christchurch area of the District outside the Urban Growth Overlay.

The proposal is not within an identified new urban growth area, but is supported by a Development Plan (ODP).

The proposal seeks 'the zoning of land to establish [a] new urban area or extensions to any township boundary in the Greater Christchurch area of the District outside the Urban Growth Overlay' and is therefore clearly inconsistent with policy UG-P3. However, the NPS-UD provides for such rezoning and resolves this tension.

Urban Form

UG-P7 Any new urban areas shall deliver the following urban form and scale outcomes:

In terms of UG-P7, the proposal has been assessed as:



<ol style="list-style-type: none">1. Township boundaries maintain a consolidated and compact urban form;2. The form and scale of new urban areas support the settlements role and function within the District's Township Network;3. The natural features, physical forms, opportunities, and constraints that characterise the context of individual locations are identified and addressed to achieve appropriate land use and subdivision outcomes, including where these considerations are identified in any relevant Development Plans; and4. The extension of township boundaries along any strategic transport network is discouraged where there are more appropriate alternative locations available.	<ol style="list-style-type: none">1. Maintaining a consolidated and compact urban form, as described in the assessment by DCM Urban;2. Providing a form and scale of urban activity that support Rolleston's role and function within the District's Township Network;3. Having no particular natural features, physical forms, or constraints that suggest urbanisation of the land is inappropriate; and4. Providing for an appropriate form of expansion along strategic transport network, accounting for the ability to provide safe and efficient access to the transport network and the existing westward extent of Rolleston township south of the PC80 site.
<p><i>UG-P8 Avoid the following locations and areas when zoning land to extend township boundaries to establish new urban areas:</i></p> <ol style="list-style-type: none">1. Sites and Areas of Significance to Māori;2. Significant Natural Areas;3. Outstanding Natural Landscapes and Visual Amenity Landscapes; and4. High Hazard Areas.	<p>In terms of UG-P8:</p> <ol style="list-style-type: none">1. There are no Sites and Areas of Significance to Māori, within the PC80 site.2. There are no Significant Natural Areas;3. There are no Outstanding Natural Landscapes and Visual Amenity Landscapes; and4. There are no High Hazard Areas.
<p><i>UG-P9 Recognise and provide for the finite nature of the versatile soil resource when zoning land to extend township boundaries to establish new urban areas.</i></p>	<p>Effects on versatile soils have been assessed as acceptable.</p>
<p><i>UG-P10 Ensure the establishment of high-quality urban environments by requiring that new urban areas:</i></p> <ol style="list-style-type: none">1. Maintain the amenity values and character anticipated within each township and the outcomes identified in any relevant Development Plan;2. Recognise and protect identified Heritage Sites, Heritage Settings, and Notable Trees; and3. Preserving the rural outlook that characterises the General Rural Zone through appropriate landscape mitigation, densities, or development controls at the interface between rural and urban environments.	<p>The proposed ODP provides for a high-quality urban environment by:</p> <ol style="list-style-type: none">1. Adopting controls on built development consistent with those in the adjacent business areas and otherwise ensuring a high quality and well-connected development through the use of an ODP;2. Avoiding any identified Heritage Sites, and Heritage Settings.3. Providing an appropriate interface at the rural and urban edge through the use of landscape buffers where required accounting for adjacent land uses.
<p><i>UG-P11 When zoning land to establish any new urban area or to extend any township boundary, avoid reverse sensitivity effects on:</i></p> <ol style="list-style-type: none">1. any adjoining rural, industrial, inland port, or knowledge zone; and2. on the safe, efficient and cost-effective operation of important infrastructure, land transport infrastructure, and the strategic transport network.	<p>The transport and noise assessments have demonstrated consistency with this policy.</p>
<p><i>UG-P12 Ensure the zoning of land to extend township boundaries to establish new urban areas demonstrates how it will integrate with existing urban environments, optimise the efficient and cost-effective provision of infrastructure, and protect natural and physical resources, by:</i></p> <ol style="list-style-type: none">1. Aligning the zoning, subdivision and development with network capacity and availability of existing or new infrastructure, including through the staging of development;2. Avoiding adverse effects on the ground and surface water resource by requiring connections to reticulated water,	<p>The transport, servicing and urban design assessments have addressed these matters, confirming that the plan change area can be effectively integrated with the existing Rolleston urban environment and community infrastructure.</p>



wastewater, and stormwater networks where they are available, or by demonstrating that the necessary discharge approvals can be obtained for all on-site wastewater and stormwater treatment and disposal facilities;

3. Ensuring the land is located where solid waste collection and disposal services are available;
4. Prioritising accessibility and connectivity between the land and adjoining neighbourhoods, commercial centres, open space reserves, and community facilities, including education providers, public reserves, and health services; and
5. Requiring safe, attractive and convenient land transport infrastructure that promotes walking, cycling, and access to public transport and public transport facilities to encourage energy efficiency and improve peoples' health and wellbeing.

Development Capacity

UG-P15 Business growth – Greater Christchurch area

Any new areas to support commercial activities, industrial activities, or activities provided for in the Port Zone or Knowledge Zone in the Greater Christchurch area shall only occur where:

1. A BDCA and FDS demonstrates a need for additional suitable development capacity within the township and the additional suitable development capacity supports the rebuild and recovery of Greater Christchurch;
2. The land is subject to the Urban Growth Overlay and the area is either:
 - a. a 'greenfield priority area', or any subsequent urban growth areas or urban containment boundaries, in the CRPS where it is an industrial activity; or
 - b. consolidated within a Key Activity Centre or within an existing General Industrial Zone, Port Zone or Commercial and Mixed Use Zone.
3. A diverse range of services and opportunities is provided for to respond to the social and economic needs identified in a BDCA, FDS or any relevant Development Plan;
4. The type, scale and function of new commercial areas are consistent with the Activity Centre Network and support mixed use activities, unless located in a Large Format Retail Zone;
5. The location, dimensions and characteristics of the land are appropriate to support:
 - a. activities that are anticipated within the existing General Industrial Zone, Knowledge Zone or Commercial and Mixed Use Zone;
 - b. community facilities and public spaces where these are anticipated by the land use zone; and
6. An ODP is prepared and incorporated into this Plan before any subdivision proceeds.

The proposal is consistent with this policy insofar that:

1. Additional suitable development capacity will be provided, albeit not as identified in a BDCA or FDS.
2. The location, dimensions and characteristics of the land are appropriate to support activities that are anticipated within the General Industrial Zone.
3. A diversity in business opportunities is demonstrated to respond to social and economic needs (albeit not as identified in a BDCA, FDS or outcomes identified in any relevant Development Plan); and
4. An ODP is prepared that would be incorporated into the Plan before any subdivision proceeds.

The proposal is not consistent with the balance of the policy, albeit such tension is resolved by the policy direction in the NPS-UD.

GIZ-01 The General Industrial Zone contains a range of industrial and other compatible activities, as well as activities that support the functioning of industrial areas.

These provisions will guide eventual development of the subject land, however it is noted that the proposed Plan Change provides for industrial



GIZ-02 The amenity values of residential and rural areas adjoining the General Industrial Zone are maintained, while recognising the functional and operational requirements of industrial activities.

GIZ-03 The scale and proportion of buildings and spaces reflect the character of the industrial zone and the requirements of activities operating within the zone.

GIZ-P1 Enable a range of industrial activities to establish and operate.

GIZ-P2 Provide for other activities to establish and operate within the General Industrial Zone where they are:

- 1. of a similar scale and nature to industrial activities; or*
- 2. ancillary to the main industrial activity on site; or*
- 3. necessary to support the needs of workers within the zone.*

GIZ-P3 Avoid activities that are incompatible with the character and function of the industrial area.

GIZ-P4 Avoid commercial activities that will undermine the viability and function of the Town Centre and Local Centre Zones.

GIZ-P5 Manage the adverse visual effects of development, while recognising the functional and operational requirements of industrial activities.

GIZ-P6 Manage the adverse effects of activities within the General Industrial Zone to maintain the character and amenity of adjoining residential and rural zones.

development in a manner consistent with these objectives.

61. Overall, it is acknowledged that the proposal is not consistent with those urban-growth related provisions which seek to limit growth to locations where a BDCA and FDS identify a need for additional suitable development capacity for Rolleston, and the land is not within the Urban Growth Overlay, or a 'greenfield priority area' or within any subsequent urban growth areas or urban containment boundaries, in the CRPS where it is an industrial activity. However, such tension is resolved by the more enabling provisions in the NPS-UD.
62. In all other respects, the proposal achieves consistency (or avoids inconsistency) with the relevant provisions of the proposed plan.
63. In regard other provisions that have immediate effect, there are no other provisions of relevance to the PC80 site that have immediate effect (i.e. no rules).

Consultation

Question 26: It is noted that the plan change request has been provided to Mahaanui Kurataiao Limited for their comment. Please provide a copy of any feedback received.

64. A copy of the MKT feedback is attached (Attachment F) and will form Appendix J to the application document. Regarding the conclusions and recommendations put forward in the consultation document, they are generally acceptable to the applicant, with most being appropriately implemented at the subdivision stage of planning. In regard the MKT comment on stormwater treatment and disposal, the conclusion to that report states that *"The existing proposal to discharge to ground via soak pits once the site is developed is not considered sufficient for stormwater treatment and retention."* The Infrastructure Report provided with the Plan Change 80 application (prepared by Inovo) addresses stormwater disposal, noting the first flush stormwater runoff will be treated through a



swale, infiltration basin or proprietary treatment devices, as appropriate. This is a common approach for stormwater disposal in Selwyn. Further, a discharge consent for disposing stormwater to ground will be required from Environment Canterbury (or a certificate of compliance required), ensuring that proposed discharges and method of treatment are acceptable.

65. In regard the recommendation to naturalise the existing water race, the Plan Change 80 proposal includes a requirement for a 10m waterway setback. The nature of the waterway treatment additional to that setback is a matter that will be addressed in detail at the subdivision stage.

Question 27: – It is noted that the applicant has informally consulted KiwiRail about the development of the site. Please advise what, if any, consultation has been undertaken with Waka Kotahi NZ Transport Agency and the Ministry of Corrections, who also have designations in close proximity to the plan change area.

66. Waka Kotahi NZ Transport Agency was consulted with extensively in regards to Plan Change 73 which is diagonally opposite the land in Plan Change 80 (PC80). Therefore, much of the discussions that were had in regards to the SH1/Dunns Crossing/Walkers Road upgrade are expected to be applicable to the PC80 land. No further consultation with Waka Kotahi NZ Transport Agency on any other specific aspects of PC80 has occurred yet, but is likely to in the coming months prior to the potential public notification and hearing. No consultation as of yet has occurred with the Ministry of Corrections, but again is likely to in the coming months prior to the potential public notification and hearing.

Yours sincerely,

Novo Group Limited

Kim Seaton

Principal Planner

M: 021 662 315 **O:** 03 365 5570

E: kim@novogroup.co.nz | **W:** www.novogroup.co.nz

021037



Attachment A: HAIL Activities Map



Attachment B: Updated Section 32 Report



Attachment C: Updated Landscape Assessment, Section and Updated ODP



Attachment D: Updated ITA



Attachment E: Ecology Advice



Attachment F: MKT Report



Attachment G: Updated Appendix C of the Infrastructure Report (Appendix A of the Section 32 Report)