

IN THE MATTER OF the Resource
Management Act 1991

AND

IN THE MATTER OF submissions on Plan
Change 2 to the
Selwyn District Plan

Report on submissions relating to Plan Change 2

**Rezoning Rural (Inner Plains) land to Living XA (Deferred)
Blakes and Trents Roads, Prebbleton**

Report Number:
To:
From:
Hearing Date:

PC 080002
Hearing Commissioner – K Gimblett
Policy Planner – C Friedel
28th and 29th July 2010

This report analyses submissions made on Plan Change 2 (PC2) to the Selwyn District Plan (SDP). The report is prepared under s42A of the Resource Management Act 1991. The purpose of the report is to assist the Hearing Commissioner in evaluating and deciding on submissions made on PC2 and to assist submitters in understanding how their submission affects the planning process. The report includes recommendations to accept or reject points made in submissions and to make amendments to the SDP. These recommendations are the opinions of the Reporting Officer(s) only. The Hearing Commissioner will decide on each submission after hearing and considering all relevant submissions, the Officer's Report(s) and the Council's functions and duties under RMA.

ATTACHMENTS

Attachment A	Location maps and ODP's
Attachment B	Addendum assessment and updated ODP
Attachment C	PC1 Planning Map 1 H5 – Prebbleton urban limit
Attachment D	PSP map and relevant experts
Attachment E	Landscape peer review
Attachment F	Traffic assessment
Attachment G	Infrastructure assessment
Attachment H	Summary of submissions and further submissions
Attachment I	Recommendations on submissions
Attachment J	Relevant District Plan objectives and policies

ABBREVIATIONS

CRETS	Christchurch, Rolleston and Environs Transportation Study
CSM2	Proposed Christchurch Southern Motorway – Stage 2
EDA	Existing Development Area (as per the Selwyn District Plan)
ODP	Outline Development Plan
PC1	Proposed Change 1 to incorporate Chapter 12A into the Regional Policy Statement
PC2	Proposed Plan Change 080002 to the Selwyn District Plan
PC7	Proposed Plan Change 080007 to the Selwyn District Plan
PSP	Prebbleton Structure Plan (Adopted 24 th February 2010)
NRRP	Canterbury Natural Resources Regional Plan
RMA	Resource Management Act 1991
RPS	Canterbury Regional Policy Statement
RLTS	Regional Land Transport Strategy
SDP	Selwyn District Plan
UDS	Greater Christchurch Urban Development Strategy and Action Plan 2007
WCSAP	Selwyn District Council Walking and Cycling Strategy and Action Plan

1. INTRODUCTION

- 1.1 My full name is Craig Robert Friedel. I am a Policy Planner for the Selwyn District Council. I hold the qualifications of Bachelor of Arts (Geography) from the University of Canterbury and Postgraduate Diploma in Resource Studies (Environmental Policy and Planning) from Lincoln University. I have subsequently been awarded Certificates of Proficiency in Advanced Resource Management Law, Advanced Urban and Regional Planning and Environmental Policy and Planning from Lincoln University.
- 1.2 I have worked in the field of planning and resource management for the last five years. This included three and a half years experience as an Environmental Consents Planner and Senior Environmental Consents Planner at Taupo District Council. I have been employed as a Policy Planner for the past year and a half at Selwyn District Council. I am a full member of the New Zealand Planning Institute. I am familiar with the Selwyn District, its resource management issues and the Selwyn District Plan.
- 1.3 This evidence:
- ☐ Sets out the contextual background and overviews PC2;
 - ☐ Outlines the planning context guiding development in Greater Christchurch, Selwyn District and Prebbleton and assesses PC2 against these sub-regional and local statutory planning initiatives;
 - ☐ Summarises and comments on the expert evidence attached to this report;
 - ☐ Sets out a recommendation, to accept or reject in whole or part, for each submission point;
 - ☐ Provides an assessment of PC2 against the statutory requirements set out in the RMA91 and the extent to which it satisfies the overall purpose and principles prescribed in Part II.

2. BACKGROUND

- 2.1 Prebbleton is one of the oldest settlements on the Canterbury Plains, having been established for more than 140 years. The fertile land surrounding the village has been utilised for market gardening and crops and the wider area supports an established equine industry. Prebbleton has a range of local services and community facilities. It is well placed on the strategic road network between Christchurch and Lincoln, being 6km from the City centre. The settlement has a distinct village character that is attributed to the historic fabric of the town, rural outlook and low-density living environments.
- 2.2 This high amenity and close proximity to Christchurch City has seen the township experience significant growth in the past 10 years, going from a 2001 population of 1,833 to a 2008 population of 2,121¹.
- 2.3 The subject land is located to the south of Blakes Road, to the west of Cairnbrae Drive and directly north-west of the urban area of Prebbleton (see **Attachment A**). It is a rural land holding between the township and the Kingcraft Drive Existing Development Area (EDA). The site provides a semi-rural outlook on the western periphery of the township, which is commensurate to its current Rural (Inner Plains) Zone. The land that is subject to PC2 is surrounded by established Living Zones that range in size from between 600m² to 1,300m² to the east, rural lifestyle properties in the Kingcraft Drive EDA to the west and rural zoned land that has been identified for future residential 'Greenfield' development areas in Proposed Change 1 to the Canterbury Regional Policy Statement (PC1) to the north and south.
- 2.4 The land is level in contour and is currently being utilised for productive rural land uses. There are no sites of historic and/or cultural significance registered in the Appendices or Planning Maps of the Selwyn District Plan, nor is the land subject to any Designations

¹ Prebbleton Community Profile www.statistics.govt.nz and Business and Economic Research Ltd – Selwyn Growth Model

or Notices of Requirement. I concur with the more detailed site description provided in Section 2 of the application.

- 2.5 On the 15th of April 2008, William Blake Limited and M & N Coffey (the applicants) lodged a private plan change request. Plan Change 2 to the Selwyn District Plan (PC2) proposes to rezone approximately 18.85ha of existing rural land (Inner Plains) to a Living XA (Deferred) Zone. The deferral is to remain in place until there is adequate capacity in the Selwyn District Council operated reticulated sewage treatment facility to service the land for residential development.
- 2.6 PC2 seeks to incorporate: (a) New planning maps to amend the zoning on the subject land from Rural (Inner Plains) to Living XA (Deferred); (b) Additional wording to Policy B4.1.4 of the Growth of Townships section of the SDP to outline the zones form and to identify its consistency with PC1; (c) Add new rules in the SDP to allow, control or prohibit future residential development in this zone; and (d) Incorporate a new ODP into the SDP to coordinate development.
- 2.7 Key features of the proposal at the time of notification included:
- ☐ Approximately 200 households at a minimum density of 10 lots per hectare, provided in areas of low (Area A - 1,000m²), medium (Area B - 600m² to 900m²) and high (Area C - 400m² to 600m²) housing densities;
 - ☐ An ODP to facilitate the coordinated development of future subdivision and land uses;
 - ☐ Road access from two main access roads, including new intersections off Blakes Road and an extension of Cairnbrae Drive, and the provision of cycle and pedestrian links through a new access point off William Street;
 - ☐ Two stormwater reserves, one open space passive recreation reserve and an extension to the existing Williams Street playground; and
 - ☐ Deferral of development until there is adequate capacity in Council's reticulated sewage system.

PC2 was publicly notified on Saturday the 10th of October 2009, with submissions closing on Thursday the 12th of November 2009. A total of 21 submissions were received (see **Attachments H & I**). A summary of submissions and a call for further submissions were notified on the 1st December 2009. Further submissions closed on Wednesday the 16th of December 2009 and 6 were received. Submissions and further submissions have been circulated previously and are not attached to this report.

- 2.8 A notice pursuant to S37 has been issued to extend the statutory timeframe for receiving submissions set in the public notice issued in accordance with Clause 5 (3) of the RMA91. This decision formalises the acceptance of the late submission lodged by V & J Cannell [**S1459**].

Addendum assessments and updates

- 2.9 A number of addendum assessments have been provided by the applicant since the notification of PC2. This material has been lodged in response to matters raised by Council staff, points raised in submissions and changes in the planning frameworks affecting Prebbleton. **Attachment B** includes the following additional assessments:
- ☐ A letter dated 31 May 2010 outlining a number of iterations to the plan change request, including: (a) Lower housing densities in Area C from 400m² to 600m² to a minimum lot size of 450m² and minimum average lot size of 550m²; (b) The inclusion of an indicative road layout to link the subject land to the PC1 'Greenfield' land directly to the south and the Meadow Mushrooms land to the east; (c) The extension of the Area B densities along the immediate boundary of the PC1 'Greenfield' land; and (d) Additional fencing height and setback restrictions.
 - ☐ An additional transport assessment prepared by the Traffic Design Group to consider the effects recent land use changes may have had on the road network since the original report was undertaken in September 2007.

- 2.10 The additional assessments, a summary of the subsequent amendments to PC2, and whether there is sufficient scope to facilitate these amendments through the submissions received, is assessed in [Section 4](#) and [Section 5](#) of this report.
- 2.11 It has become apparent in reviewing PC2 and the current District Plan that the proposed zone description of Living XA (Deferred) is in direct conflict with the Table A4.4 – Description of Townships Zone in the District Plan [A4-011].

Table A4.4 defines ‘Living X’ zones as:

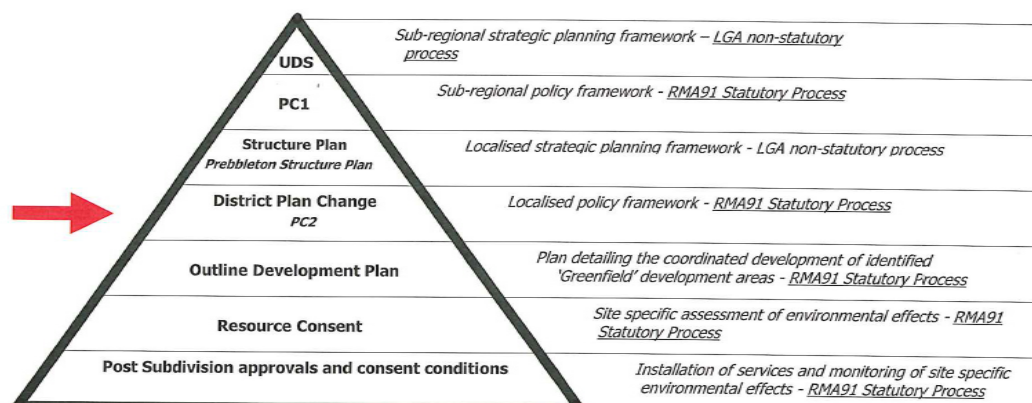
“Areas zoned as Living but not yet developed. The developer may choose the residential density for the zone, but it may not be more than that of the Living 1 Zone in the township”.

- 2.12 Therefore, the proposed Living XA (Deferred) Zone is inconsistent with Table A4.4 as it encompasses allotments that are less than the minimum average size of 800m² in the Living 1 Zone of Prebbleton.
- 2.13 I am of the opinion that a more appropriate description would be a ‘Living 1A6 (Deferred) Zone’ to ensure consistency with other zone descriptions in Prebbleton and to avoid confusion in interpreting and administering the District Plan. Council proposes to consolidate the zone descriptions and related provisions in Prebbleton as part of the forthcoming plan change (Plan Change 21) to facilitate the strategic management of growth in the township to align with the UDS, PC1 and the PSP.
- 2.14 These suggested amendments to the PC2 provisions were not raised in submissions. However, Clause 16 of the RMA91 enables local authorities to amend proposed plan change provisions without using the First Schedule process where the alteration is of minor effect, or is correcting a minor error. In this instance, the suggested changes have a neutral effect as they are restricted to ensuring the wording of the zone description and consequent changes are consistent with the District Plan. I believe it is appropriate to make the change without any risk of compromising the purpose and principles of the RMA91 or to undermine the participatory principles espoused within the Act.
- 2.15 **The Living XA (Deferred) zone has been retained throughout this report, with the amendments to the PC2 provisions outlined in [Section 8](#) [see [Amendments 1, 3 to 6, 8 & 9](#)] changing this zone description to the preferred Living 1A6 (Deferred) zone.**

3. PLANNING CONTEXT

- 3.1. The extent to which PC2 aligns with the sub-regional and local strategic planning frameworks are considered in the following sub-sections of this report. [Diagram 1](#) illustrates the hierarchy of planning processes currently in place within the Greater Christchurch sub-region.

Diagram 1: Planning process overview within Greater Christchurch



SUB-REGIONAL PLANNING CONTEXT – UDS and PC1

- 3.2. The Greater Christchurch Urban Development Strategy (UDS) delivers a strategic vision for Greater Christchurch by: (a) Detailing the location of future housing; (b) Facilitating the development of social and retail activity centre's; (c) Identifying areas for new development; and (d) Ensuring these activities are serviced with an integrated transport network and coordinated infrastructure².
- 3.3. Proposed Change 1 to the Regional Policy Statement (PC1) was notified on the 28th July 2007 as a key statutory instrument to implement the UDS. The principle techniques employed in PC1 to achieve an integrated planning approach across the Greater Christchurch area include the identification of 'Urban Limits' around existing settlements and to allocate where, and at what rate, growth should occur from 2007 through to 2041.
- 3.4. The setting of urban limits aims to promote efficient development by achieving more compact settlements, whilst providing sufficient housing to accommodate the projected population growth and to cater for business land development. PC1 encourages intensification within Christchurch City and the larger peripheral towns in Selwyn and Waimakariri Districts to :
- ☐ Reduce urban sprawl;
 - ☐ Create efficiencies in the provision of infrastructure and operation of transport networks;
 - ☐ Reinforce existing commercial centres;
 - ☐ Provide a range of living environments and housing opportunities; and
 - ☐ Improve living spaces by bringing urban design into all aspects of planning.
- 3.5. The Independent Commissioners appointed by Environment Canterbury to consider the evidence and submissions on PC1 released their Recommendation on the 1st December 2009. The Recommendation accepts that PC1 is an appropriate response to the development issues affecting Greater Christchurch and that the goal of urban consolidation will lead to efficiencies in both the provision and use of infrastructure for urban development³. Urban limits were considered an appropriate mechanism to ensure the strategic integration of infrastructure and to achieve the intensification and consolidation measures advanced by PC1.
- 3.6. This Recommendation has been accepted by Environment Canterbury. Approximately 53 appeals to this decision have been received by the Environment Court. One appellant seeks the additional 'Greenfield' land allocated to Prebbleton to be removed. This land holding is referenced as SP4 in **Attachment C**, and is located on the southern boundary of the subject land.
- 3.7. S74 (2) (a) (i) of the RMA91 requires Selwyn District Council to have regard to PC1. Significant statutory weight should be afforded to PC1 as decisions on submissions have been released. The process has involved consultation, public notification, the calling for public submissions, further submissions, provided interested parties the opportunity to be heard and afforded rights of appeal.
- 3.8. The PC1 decision amends the phasing of urban development in Prebbleton by reducing the sequencing from three to two periods. In addition, the Urban Limit of Prebbleton has been extended to the west to include a land holding fronting Trents Road, which is located on the eastern periphery of the Kingcraft Drive EDA⁴ (**Attachment C**). This land is located on the southern boundary of the subject site.
- 3.9. The inclusion of this property has been reflected in an increased allocation of 100 additional households to the four 'Greenfield' development areas (SP1, SP2, SP3 and SP4) in Prebbleton. These 'Greenfield' areas, coupled with the deferred zoned land,

² Greater Christchurch Urban Development Strategy and Action Plan 2007

³ PC1 RPS: Executive Summary, Commissioners' Recommendation Report, 01.12.2009

⁴ This area is identified in PC1 as SP4, which is referenced in Attachment B

provide a total of 1,295 households up to 2041. A minimum of 998 households are to be developed from 2007 to 2020, and a further 297 households from 2021 to 2041.

- 3.10. **Assessment:** Policy 1 of PC1 prescribes the Urban Limit for Prebbleton, which for the most part reflects the preferred growth path identified in the SDP. The appropriateness of the development site for residential intensification is confirmed in PC1, where it is identified as part of 'Greenfield' development area SP1 in Planning Map 1 H5 (**Attachment C**). The proposed densities align with the overall households allocated for Selwyn District through Policy 6 Table 2 of PC1, with the 200 households proposed in PC2 forming part of the 1,295 households allocated to accommodate the projected growth for Prebbleton over the next 30 years.
- 3.11. I support the conclusions drawn in the application that PC2 meets the objectives of PC1, reflects sustainable development that encompasses a co-ordinated approach and that the land is suitable for, and would be more effectively utilised in, residential forms of development⁵. The formalisation of a Living XA (Deferred) Zone incorporating the minimum densities of 10 households per hectare satisfies Policy 11 of PC1. PC2 will deliver a diversity of households and living environments for the future residents of Prebbleton. Policy 4 identifies Prebbleton as a town within the UDS area that is suitable to accommodate urban growth.
- 3.12. The co-ordinated development of PC2 with the established township to the north, east and south, and integration with the Kingcraft Drive EDA to the west, is assured by the requirement for any future development to align with the proposed ODP. The updated ODP provided in **Attachment B** now incorporates:
- ☐ Lower housing densities and landscape treatments along the western boundary (Area A – 1,000m² minimum net allotments area),
 - ☐ Traditional sized sections along the eastern boundary where it adjoins the established Living 1 Zone (Area B – 600m² minimum net allotment area and 900m² maximum net allotment area), and
 - ☐ Higher densities within the core of the site (Area C – 450m² minimum net allotment area and 550m² minimum average allotments area).
- 3.13. The updated ODP also seeks to integrate the PC2 land with the PC1 'Greenfield' land directly to the south and the Meadow Mushrooms land to the east by providing through connections and more standardised residential densities along the interface with the two sites. The substantive merits of these proposed changes and whether they are within the scope of submissions received on PC2 are considered in Section 5 of this report. In the context of PC1, I believe the ODP provided in support of PC2 is consistent with the general matters set out in Policy 8 and will go some way to incorporating the 'Greenfield' development into the existing town form.
- 3.14. I believe the ODP provided in **Attachment B** incorporates all the necessary urban design, public transport, reserves, infrastructure services, distribution of residential densities, pedestrian and cycle linkages specified in Policy 8 of PC1 and will deliver the high level of urban design anticipated by Policy 7.
- 3.15. Overall, I consider that PC2 is able to align with the relevant objectives and policies prescribed in PC1 and will deliver the UDS vision.

SELWYN DISTRICT PLANNING CONTEXT

- 3.16. Selwyn District Council has advanced a number of initiatives to take a more directive role in determining where, and in what fashion, urban growth should occur in the eastern area of the District. These include: (a) Being a signatory to the UDS; (b) A partner in the development of PC1; (c) Adopting Structure Plans for Lincoln, Rolleston and Prebbleton; (d) Notifying Plan Change 7 (PC7) to incorporate a framework into the District Plan to manage the strategic residential growth of townships; and (e) Preparing

⁵ PC2 Application Request; Paragraphs 3.6 and 3.7, Revision 3 December 2008

design guides for subdivision⁶, medium density housing and the subdivision of existing rural residential sections established within the township boundaries.

- 3.17. This represents a significant shift from a developer-led approach, to a more strategic planning framework incorporating community outcomes determined through structure plans and other strategic planning initiatives.

Proposed Plan Change 7 to the Selwyn District Plan (PC7)

- 3.18. PC7 seeks to introduce substantial amendments to the SDP to provide for the strategic growth of townships and to introduce new subdivision and urban design standards. Emphasis is placed on implementing a planning framework that supports strategic residential growth in townships within the UDS area of the District, particularly Lincoln and Rolleston where Structure Plans had been adopted at the time of drafting PC7.
- 3.19. In addition, District-wide and Township objectives, policies and rules are proposed within the subdivision section of the SDP, which are accompanied by specific provisions and a design guide to facilitate medium density and comprehensive housing. This is to support the consolidation of townships and to achieve good urban design outcomes required by PC1. These principles include the delivery of high quality built forms that provide relatively private outdoor living areas, do not appear out of place due to their bulk or design and create appropriate streetscapes.
- 3.20. Medium density housing in the context of PC7 (Lincoln and Rolleston townships only) applies to maximum average allotment sizes of 450m² and minimum individual allotment sizes of 350m² ⁽⁷⁾. The amended ODP, updated PC2 rules and the addendum assessments provided in **Attachment B** reduce the densities proposed in the Area C component of the Living XA (Deferred) Zone so that they are outside the definition of 'medium density' housing in PC7. These amendments, if accepted, would negate the need for the corresponding medium density housing provisions being advanced in PC7 to be carried through to PC2.
- 3.21. PC7 was publicly notified on the 27th February 2010 and 95 submissions have been received. Submissions were notified and further submissions were called on the 5th June 2010.

PREBBLETON PLANNING CONTEXT

Prebbleton's urban form and limit to growth – Environment Court

- 3.22. The Environment Court resolved in its decision on a number of appeals to the SDP relating to land in Prebbleton that the southerly limit of residential growth should be Trices and Hamptons Roads⁸. Particular emphasis was placed by the Court on the need to retain the greenbelt separation between Prebbleton and the Christchurch City territorial authority boundary to the north. The electricity transmission lines were identified as the limits to growth east of the existing urban form, with the Kingcraft Drive EDA and Shands Road being the preferred cut off points for growth to the west. The Court did not prescribe a definitive limit to growth to the west due to an absence of direction in the SDP at the time and because there was insufficient information at hand to reach a final conclusion⁹.
- 3.23. A plan was produced showing the extent of the Preferred Growth option for Prebbleton that illustrates the northern, eastern, southern and western limits to the townships growth¹⁰. This plan was inserted into the SDP as Appendix 31 to the Township Volume¹¹ (see **Attachment J**). These decisions identified the need for the urban form of Prebbleton to expand in a more compact concentric shape as the township had

⁶ SDC's Subdivision Design Guide was recognised with a Best Practice award by the NZPI in 2010

⁷ SDP: PC7 Table C12.1 – Allotment Sizes, 27.02.2010

⁸ D Bates & Ors v Selwyn District Council C7/2006

⁹ D Bates & Ors v Selwyn District Council C7/2006

¹⁰ D Bates & Ors v Selwyn District Council C116/2006

¹¹ Selwyn District Plan: Township Volume Part E; Appendix 31, E31-001

become elongated along Springs Road from its traditional core south. The current urban form of Prebbleton has evolved from a high demand for residential properties, protection of the northern 'greenbelt' and the need to avoid Versatile Soils.

- 3.24. Policy B4.3.56 of the SDP reiterates that residential growth should be in the east and west directions to: (a) Create a compact concentric urban form; (b) Minimise pressure on Springs Road; and (c) Reduce the length of 'rural residential' boundaries and the corresponding increased potential for adverse reverse sensitivity effects.
- 3.25. Policy B4.3.5 outlines the general benefits associated with a compact concentric urban form in improving the functionality of townships, which include: (a) Reducing the number of allotments that share a boundary with the Rural Zone and the potential conflicts between incompatible land uses; (b) Facilitating the cost effective provision of services; (c) Reducing the travel distances to business and community facilities; (d) Maintaining the visual distinction between the rural area and townships; and (e) Reducing the impacts on the road network.
- 3.26. **Assessment:** I concur with the assessment provided in paragraphs 7.30 through to 7.43 of the application, where confirmation is provided that PC2 satisfies the Growth of Townships objectives and policies in the SDP.
- 3.27. The appropriateness of the site for intensification to urban densities is reinforced by the fact that the subject land is bordered by existing residential land to the east and rural residential development to the west. The land immediately to the south and to the north on the opposite side of Blakes Road have been identified for 'Greenfield' development under PC1 (SP1 and SP4). The intensification of the development site and the resulting urban form is considered appropriate as it achieves the following:
 - ☐ Consolidates the residential expansion of the township west of Springs Road to avoid 'ribbon' development along Springs Road in a manner that compliments the character of the area;
 - ☐ Represents a natural progression of the urban area based on logical physical boundaries;
 - ☐ Aligns with the District Plans directive to encourage new urban areas to be clustered around established settlements;
 - ☐ Achieves a compact concentric settlement pattern based on the logical progression of residential growth;
 - ☐ Is compatible with the established built forms on the directly adjoining properties, which includes existing and future residential densities to the north-east, east and south-east and rural residential development to the west; and
 - ☐ Avoids the potential for adverse reverse sensitivity effects arising from the continued use of the land for productive rural uses.
- 3.28. It is concluded that PC2 is consistent with the preferred urban limit to growth prescribed in Appendix 31 of the SDP and the anticipated urban form of Prebbleton.

Prebbleton Structure Plan (PSP)

- 3.29. The PSP was adopted by Selwyn District Council on the 24th February 2010. The Structure Plan provides a strategic planning framework for coordinating development in the township for the next 30 years. It is a template for ensuring that the necessary housing, infrastructure and community needs in the township are provided, and that high standards of town planning and urban design are achieved.
- 3.30. The scope of the PSP was restricted to the Urban Limit prescribed in PC1 and does not review the appropriateness for the peripheral rural land to accommodate rural residential development or future urban expansion beyond 2041. The PSP lists the elements that contribute to the amenity and character of the township and outlines what actions should be taken to ensure these qualities are retained.
- 3.31. The PSP includes preliminary ODP's for each of the four 'Greenfield' development areas detailed in PC1. It prescribes the number of sections to be developed in each ODP, the timing of when it is to be developed and highlights the design elements

needed to ensure the necessary infrastructure, community services, character and residential forms of development are provided.

- 3.32. **Attachment D** includes the PSP map, a copy of Table 5 and the preliminary ODP prepared for the PC1 SP1 'Greenfield' development area encompassing the development site. Council is seeking to implement the PSP through Proposed Plan Change 21 (PC21), which will include a similar strategic planning framework to what is currently being advanced through PC7.
- 3.33. **Assessment:** The household yields and densities, infrastructure requirements, urban design outcomes and character elements being proposed in PC2 are consistent with the PSP. PC2 is not in conflict with any of the development constraints, community aspirations and issues identified in the PSP.
- 3.34. The PC2 ODP provided in **Attachment B** generally aligns with the preliminary ODP included in the PSP. The scope and substantive merits of the amended ODP are considered in more detail in Section 5 of this report.

4. EXPERT EVIDENCE

- 4.1 A number of expert reports have been commissioned to review PC2 and address the issues raised in submissions. These reports are provided in full as attachments to this report.

Landscape peer review

- 4.2 **Mr Andrew Craig**, of Andrew Craig Landscape Architects, undertook a peer review (**Attachment E**) of the methodologies used to formulate the Landscape and Visual Assessment prepared by Isthmus Group in support of PC2.
- 4.3 Mr Craig concludes that the Landscape and Visual Assessment is adequate, whilst identifying that it is substantially bolstered by additional information provided in the application by Aurecon. Mr Craig confirms that the ODP and Living XA (Deferred) Zone policy and rules will deliver high levels of landscape amenity in accordance with what can be expected for living zones in Prebbleton. Mr Craig further states that the proposal will be compatible with the surrounding land uses.
- 4.4 Mr Craig highlights a number of matters that require further consideration, these include:
- ☐ Confirmation of the boundary planting proposed for the ODP landscape buffer at the interface between the Living XA (Deferred) Zone and the Kingcraft Drive EDA and how this will be maintained in perpetuity;
 - ☐ Extent of the loss of rural based amenity on neighbours; and
 - ☐ The need for a rule to restrict front fences within the building setback.
- 4.5 The applicant's representative has confirmed that the landscape buffer is to be planted in accordance with an approved plan and that the ongoing management and maintenance to ensure the interface treatments remain effective will be achieved through private covenants.
- 4.6 The details of this management plan and consent notice should be formalised as part of any subsequent resource consent process, should PC2 be adopted. Amended wording to proposed Rule 12.1.3.35 is considered necessary to clarify the extent of landscape mitigation and the demarcation of the interface treatment from residential sections [Section 8 – Amendments 11 and 12]. The requirement also addresses the relief sought in submissions [**S1419 – D & P Williams**].
- 4.7 The loss of rural amenity is a relevant consideration that has been assessed in the PSP and identified in the SDP. It is my opinion that giving effect to the longstanding preferred growth of Prebbleton outweighs the loss of rural amenity associated with the development site. Furthermore, the continued operation of the land holding in rural

productive uses may increase the risk of reverse sensitivity effects, with land on all four boundaries having either been developed to living zone standards or identified for future residential purposes.

- 4.8 An additional Rule is considered necessary to implement the mitigation proposed in the Landscape and Visual Assessment to restrict front fences within the minimum front building setback. The addendum assessment in **Attachment B** clarifies this matter by restricting fencing within the street setback to ensure consistency with the standard bulk and location standards prescribed in the District Plan. Mr Craig has considered this amended provision, in addition to the other supplementary material lodged since the close of submissions, and concluded that he supports these changes.
- 4.9 Mr Craig recommends a number of amendments to proposed Policy B4.1.4 and the proposed rules being sought by PC2. These changes are all considered appropriate for the reasons stated in Mr Craig's evidence and have been included in the Recommended Changes detailed in Section 8 [Amendments 8, 9, 11, 12 and 13] of this report.
- 4.10 It is considered that there is scope provided in the submissions to facilitate these amendments as they are addressing submitters concerns with the potential incompatibility of the households proposed in PC2 with the existing residential form and character of the town [**S1422.02** – G & R Savage, **S1411.03** – D Schurgers, **S1412.02** – G Craig, **S1420.02** – H Steer, **S1421.01** – P Reveley and **F1412** G Craig, **F1460** A Meaclem & R Hyndham and **F1461** K & S Coffey].

Traffic assessment

- 4.11 **Jeff Owen**, a traffic engineer with AECOM New Zealand Ltd, has provided a report (**Attachment F**) that considers the initial Transport Assessment and Addendum Report prepared by Traffic Design Group in support of PC2.
- 4.12 Mr Owen confirms that the expected increase in vehicle movements generated by the proposal can be accommodated within the existing road network. The report identifies that PC2 is consistent with the SDP and aligns with the PSP.
- 4.13 Mr Owen concludes that PC2 is thorough and addresses the relevant transport related issues that can be addressed at this time. Mr Owen agrees with the Transport Assessment Reports prepared by the Traffic Design Group, stating that any subsequent subdivision is unlikely to have any significant effect on the safety or efficiency of the surrounding road network.
- 4.14 Mr Owen verifies the need for additional road connections linking the subject land to the 'Greenfield' land to the south and the Meadow Mushrooms site to the east detailed in the PSP. This supports the wider road hierarchy, connectivity and enhances the use of alternative modes of transport. These additional connections are outlined in the PSP and supported in submissions. As noted previously, the addendum assessment and amended ODP in **Attachment B** now includes the connections between the PC2 land and the PC1 'Greenfield' land to the south and the Meadow Mushroom land to the east. These amendments provide the relief sought in submissions [**S1419.06** – D & P Williams and **F1458** – Ecan].
- 4.15 Mr Owen has considered several traffic matters raised in submissions on PC2. These are reported on in Section 5 of this report, which considers the submissions received.

Infrastructure assessment

- 4.16 **Mr Hugh Blake-Manson**, Council's Asset Manager Utilities, has provided a report (**Attachment G**) that assesses the Servicing Report prepared by Auercon Limited.
- 4.17 Mr Blake-Manson concludes that PC2 sufficiently accounts for the water, wastewater and stormwater utilities and confirms that there are no fundamental reasons to not allow the plan change to proceed.
- 4.18 A number of matters are raised in Mr Blake-Manson's report that will need to be addressed by the land owner prior to onsite works commencing. It is considered that

the resource consent process, should PC2 be formalised, is the appropriate time to provide this information to ensure that the necessary conditions are imposed on the future design, construction, operation and maintenance of utility services and related infrastructure. No additional amendments to the Living XA (Deferred) Zone in relation to infrastructure are considered necessary.

5. SUBMISSIONS

5.1 A total of 19 submissions (including the one late submission) oppose PC2, one submission is in support and one submission opposes PC2 in part (**Attachment H**). Six further submissions were received.

5.2 These submissions have been grouped into the following topic areas and assessed accordingly:

- (i) Section sizes and density
- (ii) Vehicle movements;
- (iii) Cycle ways and walkways;
- (iv) Infrastructure;
- (v) Nuisance effects;
- (vi) Reserves;
- (vii) ODP and District Plan provisions; and
- (viii) Natural habitat.

5.3 Recommendations on each submission are described in this section and summarised in **Attachment I**.

(i) Section sizes and housing density

Proposed amendments to PC2 (as notified)

5.4 A number of amendments to PC2 were introduced in **Section 2** of this report and included in **Attachment B**. These changes were received from the applicant after the submission period had closed. The changes that are of particular relevance to the submissions that have raised concerns with the proposed section sizes and housing densities proposed in PC2 are:

- ☐ A decrease in the housing densities proposed for Area C from 400m² to 600m² to 450m² minimum lot sizes and an average minimum lot size of 550m². This change has been promoted to address concerns raised in submissions and to avoid uncertainty or inconsistency with PC7; and
- ☐ An extension of the more standardised residential section sizes contained in Area B to replace the low density sections along the border of the PC1 'Greenfield' land directly to the south. This change has been promoted to align PC2 with the PSP and decisions released on PC1, which has identified the land directly to the south as a future residential 'Greenfield' area.

5.5 It is my opinion that the first set of amendments are appropriate in ensuring that the higher housing densities proposed as part of PC2 are now outside of what are considered 'medium' density housing in the context of Council's PC7 and PC1. These amendments are deemed to be within the scope of the submissions received, specifically those pertaining to section sizes and housing densities.

5.6 The second proposed amendment to PC2 and the ODP are also considered to be appropriate. This is because the increased densities along the interface between the PC2 land and the PC1 'Greenfield' residential land will facilitate a more co-ordinated development of the wider area by providing graduated residential densities on the eastern limits of the town. In addition, the increased density of Area B will offset the lower densities within Area C, which will ensure that the overall yield of the PC2 land

satisfies the minimum densities of 10 households per hectare prescribed for Prebbleton 'Greenfield' residential areas in Policy 11 of PC1. The amended ODP also better aligns PC2 with the wider contextual analyses formulated in the PSP.

- 5.7 However, there is a degree of uncertainty as to whether this particular amendment is:
- (a) Within the scope of submissions received on PC2;
 - (b) Whether formalising the change may result in additional effects over and above what could have been anticipated by a reasonably well informed person in reviewing PC2 at the time of notification and the submissions received; and
 - (c) Whether all potentially affected parties have been given the necessary opportunity to consider and lodge submissions on the change outlined above.
- 5.8 The applicant in the covering letter provided in **Attachment B** states that the amended densities are within scope as they address the relief sought in submissions [**S1419.06** – *D & P Williams* and **S1415.02** – *P & J Francis*] (see **Attachment H**). However, the degree to which these submissions are able to facilitate the proposed change is subjective depending on how the relief being sought in submissions is interpreted.
- 5.9 In this instance I am not convinced that the submissions referenced above specifically seek the Area B densities now proposed in the amended ODP, nor am I confident that all potentially affected parties could have ascertained the effects that could arise from formalising this component of the amended ODP through a review of the summary of submissions.
- 5.10 It is for the above reasons that I support the increased densities along the interface between the PC1 'Greenfield' land to the south and the subject property in principle, but believe that such a change is beyond the scope of the relief sought by the submissions received on PC2 [**Section 8 – Amendment 2**].
- 5.11 The implementation of the PSP through PC21 is likely to include higher densities along this interface to assist in the coordination of future urban development. This process would provide an opportunity for all potentially affected parties to review such a change and to make an informed decision on whether to participate in the process to consider its merits.

Consideration of the submissions on section sizes and household density

- 5.12 A number of submitters raise concerns about the high density component of PC2 (Area C) and seek that it is reallocated to either medium or low density households to preserve the character of the area and to align with the PSP [**S1404.02** – *C Fossey*], **1407.01** – *B Gomibuchi* and **1415.02** – *P & J Francis*]. These submissions were supported by one further submission [**F1412** – *G Craig*].
- 5.13 Similar submission points oppose PC2 as it is believed that densities any higher than one dwelling per 600m² are too high and that the current densities of at least one dwelling per 800m² should be retained [**S1406.06** – *K Gillespie*, **1408.01** & **1408.02** – *A Berry*, **1409.02** – *A Rudd*, **1421.01** – *P Reveley*, **1459.04** – *V & J Cannell (Late Submission)*]. These submissions were supported by three further submissions [**F1412** – *G Craig*, **F1460** – *A Meaclem & R Hyndman* and **F1461** – *K & S Coffey*].
- 5.14 Two submitters seek the plan change request to be rejected and the original village left in its current size [**S1411.01** & **1411.03** – *D Schurgers* and **1412.02** – *G Craig*]. These submissions were supported by one further submission respectively [**F1412** – *G Craig*].
- 5.15 **Assessment:** I support the conclusions drawn in the application, where it states that the proposed Living XA (Deferred) Zone is consistent with the UDS, PC1 and PSP¹². The PC2 densities are generally compatible with the established development in the immediate vicinity of the site, where the adjoining Cairnbrae Drive, Waratah Park and

¹² PC2 Application Request: Paragraph 8.1, Revision 3 December 2008

Williams Street have housing densities of 9.5, 9 and 9 dwellings per hectare respectively. The amended ODP further aligns PC2 with PC1 and the PSP.

- 5.16 The household densities of Area C have been reduced to facilitate larger lot sizes that reflect more standard, rather than 'medium', residential densities. The higher densities of development are contained within the centre of the development site (Area C) to reduce any effects on the amenity of directly adjoining residents. The graduated densities proposed in PC2 will integrate land that has been identified for future residential use for some time into the Living 1 Zone to the east. A clear demarcation with the lifestyle living environments of the Kingcraft Drive EDA to the west has been provided, which is also supported by lower housing densities and landscape mitigation along this residential/rural residential interface.
- 5.17 It is apparent in reviewing a number of the submissions opposing PC2 that local residents believe their amenity will be compromised by multi-level apartments. There is also a negative perception that densities ranging between one household per 400m² to 800m² will attract lower socio-economic groups into the community and deliver poor quality developments.
- 5.18 It is acknowledged that the higher densities of development that form a component of PC2 is more intensive than the 800m² sections that have been the norm in Prebbleton until recently. However, a paradigm shift in thinking of the current and future land owners in Greater Christchurch is required to facilitate the urban consolidation principles in PC1. This includes the need to intensify urban areas to curb sprawl, provide sustainable transport networks, promote alternative modes of transport, achieve a critical mass of household to support the integrated provision of infrastructure and to minimise adverse effects on natural resources.
- 5.19 Higher density housing does not equate to lower quality development. The Living XA (Deferred) Zone will provide mixed density housing to meet a wider range of needs as people enter different stages in life. There are sufficient development controls in the Township Volume of the SDP and PC2 to preserve the character of Prebbleton. The Subdivision Design Guide also provides a non-statutory mechanism to ensure the best urban design outcomes for future subdivisions in the town are delivered.
- 5.20 Several amendments to the PC2 provisions are suggested in Section 8 [Amendments 2, 3, 4, 5, 6, 7, 8, 10, 11, 13] to address the above submissions and to make the Living XA (Deferred) Zone policy and rules more specific and prescriptive. These include restricting fencing within 4m of the street setback to ensure consistency with the current Living Zone bulk and location setbacks and rewording of proposed Policy B4.1.4.
- 5.21 As detailed previously, the high density component (Area C) of PC2 has been reduced to address concerns raised in submissions and to better align the proposed zoning with the PSP. I believe that the necessary integration of the PC2 land holding with the wider township will be able to be successfully achieved. In addition, PC2 will satisfy the minimum household yields prescribed in PC1 to facilitate urban consolidation, without undermining the character of Prebbleton.
- 5.22 There is uncertainty in the submissions received as to the difference between medium and standard housing densities. As means of clarification, the Area C densities proposed in PC2 will accommodate stand alone homes that are akin to standard residential areas, rather than the more intensive living environments encompassing 'medium' density or 'comprehensive housing'. It will not include connected terraces of houses, apartments or closely spaced homes built "one behind the other".
- 5.23 The adoption of the suggested amendments to the Living XA (Deferred) Zone provisions will ensure that PC2 delivers the same quality of living environments as standard residential developments. This includes providing sufficient private yard space, ensuring the higher housing densities do not appear out of context due to their bulk or design and that the streetscape is not compromised.

- 5.24 I believe that PC2 is able to deliver an integrated and sustainable development framework to meet the demand for housing in Prebbleton without compromising the character elements detailed in the PSP¹³.
- 5.25 One submitter recommends that any future sections are a minimum size of 800m² unless for over 60's units [**S1405.02** – *J Dixon*]. This submission is supported by one further submission [**F1412** – *G Craig*]. The reasons given for precluding higher densities of development are the need to avoid ghetto style housing. A similar submission recommends that high density housing not be constructed unless for retirement purposes and that it be restricted if there is no demand for this form of development [**S1422.02** – *G & R Savage*]. This submission is also supported by one further submission [**F1412** – *G Craig*].
- 5.26 **Assessment:** The above submitters indicate a degree of comfort with higher densities of development, but only where they are provided as elderly persons housing. As detailed above, the higher densities of development in the Living XA (Deferred) Zone are limited to a portion of the site within a generally centralised location some distance from current residential land. The applicant has lowered the densities of Area C to address the above submissions and to align PC2 with PC1 and the PSP.
- 5.27 Higher density housing of the nature proposed in Area C will not equal low quality housing, rather it will provide for a diversity of living environments within Prebbleton to meet a wider range of needs. This includes singles, small families, professionals or elderly persons who want the convenience, amenity, services and social networks available in a small semi-rural town but do not want large sections, gardens or yard space to maintain.
- 5.28 The existing bulk and location standards will continue to apply to the Living XA (Deferred) Zone, which ensures that any future dwellings will be of a similar form to what already exists in Prebbleton.
- 5.29 One submission point opposes PC2 on the grounds that the proposed through road will fail to retain the character and atmosphere of Prebbleton [**S1413.02** – *M Hollis*]. This submission is supported by two further submissions [**F1412** – *G Craig* and **F1461** – *K & S Coffey*].
- 5.30 **Assessment:** The proposed through road is not only essential in providing the necessary links and connectivity for the Living XA (Deferred) Zone, but also in enabling the integrated development of the western urban area of Prebbleton. The road hierarchy has been formulated to direct vehicles to the appropriate connection points, which is based on a grid layout that is conducive to efficient vehicle, pedestrian and cycle movements. I believe that the proposed network will assist in integrating development on the western side of Springs Road with the town centre, services, community facilities (town hall and bus stops), identified 'Greenfield' development areas and established residential neighbourhoods to the east of the site.
- 5.31 The PSP identifies the through road as a key component of a future walking and cycling route that will eventually link the open space reserves, town centre and community facilities through a dedicated circular network¹⁴ (see **Attachment D**). These factors will promote the character and liveability of Prebbleton by promoting a conventional grid layout in preference to cul-de-sacs.
- 5.32 Two submission points seek the provision of low density housing to the rear of the directly adjoining properties fronting Norris Street. These same submissions also request that restrictions are placed on multi-level buildings [**S1420.02** – *H Steer* and **1421.01** – *P Reveley*]. One further submission supporting S1420.02 and three further submissions support S1421.01 were received [**F1412** – *G Craig*, **F1460** – *A Meaclem & R Hyndman* and **F1461** – *K & S Coffey*].

¹³ The PSP identifies that the current village can support a limited amount of development over the next 30 years, but highlights a number of qualities that contribute to the character of the township that need to be protected. These include: (a) sense of character; (b) rural aspect; and (c) sense of community.

¹⁴ PSP: 11.3 Circular Walking and Cycling Route, Page 54

- 5.33 **Assessment:** Only a small portion of higher density housing is proposed (Area C 450m² minimum and 550m² minimum average lot sizes), which are located centrally within the site away from the established residential areas on the eastern boundary of the site. As stated above, the high density component (Area C) of PC2 has been reduced to address concerns raised in submissions and to better align the proposed zoning with the PSP. This will ensure that the PC2 land holding will be integrated into the surrounding land and the wider township. It will also satisfy the minimum household yields prescribed under PC1 to facilitate urban consolidation, without undermining the character of Prebbleton.
- 5.34 The interface between the existing residential land and the PC2 land is proposed to incorporate allotments ranging from between 600m² to 900m² (Area B) to achieve a graduated density. This layout will avoid any housing that is significantly more intensive than the standard Living 1 Zone (800m²) allotments in Prebbleton, which are located directly adjacent to the properties fronting Norris Street.
- 5.35 The standard maximum building height of 8m will apply to all future housing in accordance with the SDP unless resource consent is sought. This will preclude multi-level housing and provide the submitters with a degree of certainty that the bulk and location of any future houses in the Living XA (Deferred) Zone will be consistent with other residential areas in Prebbleton. In any case, I do not believe that the provision of the smaller lots in Area C will be inappropriate.
- 5.36 One submission point requests Council to ensure that infill development occurs before 'Greenfield' land is developed and that one set of consistent planning rules should apply to all **[S1417.02 – Akaroa Orchards]**.
- 5.37 **Assessment:** Council cannot preclude the lodgement of private plan change requests and resource consent applications, which provide scope for innovation, facilitates 'effects' based planning and enables sustainable development that has not necessarily been anticipated by the District Plan to occur where it satisfies the purpose and principles of the RMA.
- 5.38 The comprehensive suite of development controls that apply to the 350m² sections in the Living L1A5 Zone of Prebbleton are not considered appropriate for PC2, which has mixed densities where larger sections on the periphery offset the smaller sections proposed for the central core of the site.
- 5.39 It should also be recognised that the Living 1A5 Zone package was formalised prior to PC1, which has set urban limits to growth, identified 'Greenfield' development areas and prescribed minimum household densities. The strategic planning approaches espoused in PC1 and the PSP are preferred to intensifying established residential areas, as conflict is likely to arise where the character and amenity of existing residents may be compromised by significant infill development.

RECOMMENDATION:

That for the reasons discussed, all the above submissions **1422.02, 1405.02, 1411.01, 1411.03, 1412.02, 1406.06, 1408.01, 1408.02, 1409.02, 1421.01, 1459.04, 1404.02, 1407.01, 1417.02, 1415.02, 1413.02, 1420.02** and further submissions **F1412, F1460 and F1461** be **ACCEPTED IN PART** and submission **1417.02** be **REJECTED**.

(ii) Vehicle movements

- 5.40 Six submitters oppose PC2 on the grounds that any additional vehicle movements down Williams, Norris and Charles Streets should be restricted **[S1405.01 – J Dixon, 1406.01 & 1406.02 – K Gillespie, 1409.01 – A Rudd, 1411.02 – D Schurgers, 1412.01 – G Craig, 1415.01 – P & J Francis]**. One further submission supports the above submission points **[F1412 – G Craig]**. Nine similar submission points recommend that Council decline PC2 and that the proposed road connections accessing Williams Street should be amended to cycle and pedestrian links only **[S1404.01 – C Fossey, 1413.01**

& **1413.03** – M Hollis, **1414.02** – N Carlisle, **1416.01** – W Nicholson, **1418.01**, **1418.02** & **1418.03** – B & D Craddock and **1422.01** – G & R Savage].

- 5.41 **Assessment:** The request proposes a grid layout that is conducive to good pedestrian permeability, whilst also recognising the capacity and hierarchy of the local roads that feed into the development site. This is to achieve an integrated road network that promotes connectivity, whilst having the least impact on existing and future residents and road users. This road network, and the associated pedestrian and cycle links, align with what is anticipated in the UDS and PC1 at a strategic level. It also aligns with the PSP and assists to deliver an integrated road network for the township.
- 5.42 All potentially adverse traffic effects arising from the proposal have been considered by Traffic Design Group in the request, and subsequent addendum transport assessment, and by AECOM on behalf of the Council. These traffic assessments have concluded that any additional vehicle movements that can be attributed to PC2 will not compromise the safety and efficiency of the road network.
- 5.43 A number of submitters (eight) have concerns that the additional vehicle movements will compromise the safety of residents, including children, elderly and learning impaired persons living in Williams, Norris and Charles Streets. Particular concerns were raised for the safety of children commuting to the Primary School, the Williams Street playground and the Plunket rooms at the corner of Williams Street and Springs Road [**S1404.01** – C Fossey, **1405.01** – J Dixon, **1406.01** – K Gillespie, **1411.02** – D Schurgers, **1412.01** – G Craig, **1414.02** – N Carlisle, **1416.01** – W Nicholson, **1418.01** & **1418.04** – B & D Craddock and **1422.01** – G & R Savage]. These submission points were supported by one further submission [**F1412** – G Craig].
- 5.44 **Assessment:** Mr Owen of AECOM considered these submission points and concluded that the traffic volumes for Williams, Charles and Norris Streets are low, that the carriageway specifications and road status are able to cater for the projected household numbers, and that these vehicle movements can be incorporated into the wider network without compromising road safety or efficiency.
- 5.45 One submission point opposes any additional vehicle movements as it is believed it will exacerbate car parking overspill associated with the Primary School on Blakes Road [**S1413.01** – M Hollis]. One further submission was lodged in support of this submission point [**F1412** – G Craig].
- 5.46 **Assessment:** Mr Owen has inspected the site and did not encounter any parking overspill at the time of his visit. However, Mr Owen notes that there is no existing broken yellow limiting parking or yield control at the Blakes Road and Norris Street intersection.
- 5.47 It is recommended that these controls are investigated further at the time of subdivision, should PC2 be adopted. This approach has been confirmed as being appropriate by Council's Asset Manager: Transportation.
- 5.48 Three submission points recommend that Council decline PC2 on the grounds that any additional vehicle movements through the Waratah Park and Cairnbrae Drive subdivisions should be restricted [**S1459.01**, **1459.02** & **1459.03** – V & J Cannell (*Late Submission*)]. One further submission was lodged in support of this submission point [**F1412** – G Craig].
- 5.49 **Assessment:** As detailed above, this through connection is required to achieve the necessary road hierarchy to effectively service the subject land and the transport network supporting development to the west of Springs Road.
- 5.50 Mr Owen considered these submission points and concludes that the traffic volumes through the Waratah Park development via Lindsay Drive and Cairnbrae Drive are low, the carriageway specifications and road status are able to cater for the projected household numbers, which can also be accommodated into the wider road network without compromising road safety or efficiency.

RECOMMENDATION:

That for the reasons discussed, submissions **1405.01**, **1406.01**, **1406.02**, **1409.01**, **1411.02**, **1412.01**, **1415.01**, **1404.01**, **1413.01**, **1413.03**, **1414.02**, **1416.01**, **1418.01**, **1418.02**, **1418.03**, **1422.01**, **1404.01**, **1405.01**, **1406.01**, **1411.02**, **1412.01**, **1414.02**, **1416.01**, **1418.01**, **1418.04**, **1459.01**, **1459.02**, **1459.03** and further submission **F1412** be **REJECTED** and submission **1413.01** and further submission **F1412** be **ACCEPTED IN PART**.

(iii) Cycle ways and walkways

- 5.51 Two submitters support and encourage the cycle way and walkway network proposed in the ODP of PC2 [**S1405.03** – J Dixon and **1418.06** – B & D Craddock]. Two similar submission points seek to restrict additional vehicle movements onto Williams Street, which they feel should be integrated into the development site by a walkway access and cycle way link only [**S1414.01** – N Carlisle and **1418.04** – B & Craddock]. These two submissions are supported by one further submission [**F1412** – G Craig].
- 5.52 **Assessment:** In my view the provision of an integrated road network that includes dedicated space for cycling, walking and other modes of transport as alternatives to private motor vehicles is essential in delivering liveable urban areas that have safe and efficient transport and commuter networks. This is supported by a number of sub-regional and local planning strategies¹⁵ and confirmed in the traffic assessments undertaken by Traffic Design Group and AECOM.
- 5.53 Any restrictions on vehicle movements through the proposed Williams Street access will compromise the efficiency of the remaining road network provided in PC2. The cycle way and walkway network proposed in the ODP and PC2 provisions are therefore considered to be necessary and appropriate.

RECOMMENDATION:

That for the reasons discussed above, submissions **1405.03** and **1418.06** be **ACCEPTED**, submissions **1414.01**, **1418.04** and further submission **F1412** be **REJECTED IN PART**.

(iv) Infrastructure

- 5.54 Two submission points identify that PC2 should not proceed until there is sufficient capacity in the reticulated wastewater system [**S1406.04** – K Gillespie and **1417.01** – Akaroa Orchards]. One further submission was lodged in support of these submission points [**F1412** – G Craig].
- 5.55 **Assessment:** PC2 is seeking a deferred zone acknowledging that wastewater connections are not currently available, but that Council will have sufficient network capacity in the near future.
- 5.56 Development in Lincoln, Prebbleton, Springston and Tai Tapu are currently dependent upon an agreement with Christchurch City Council, which enables wastewater from these townships to be pumped to the Bromley Plant for treatment and disposal. This arrangement is unable to be continued.
- 5.57 The existing demand for connections, coupled with the additional households proposed in the 'Greenfield' development areas within PC1, has necessitated Selwyn District Council to progress the East Selwyn Sewer Scheme (ESSS). The ESSS involves a

¹⁵ UDS, PC1, CRETS, Regional Land Transport Strategy 2008 – 2018, Canterbury Regional Travel Demand Management Strategy 2008, SDC Walking and Cycling Strategy & Action Plan and the Prebbleton Structure Plan

significant upgrade to the existing Pines Wastewater Treatment Plant in Rolleston to cater for the long term growth projected for the eastern area of Selwyn District¹⁶.

- 5.58 The District Plan acknowledges this situation and land has been rezoned in Prebbleton for intensification to residential densities in lieu of available wastewater connections being available¹⁷. This is in recognition that these deferred zones satisfy the objectives and policies of the SDP, including those relating to the Preferred Growth option for Prebbleton, and the relative surety that connections will be made available in the short to medium term.
- 5.59 On this basis, I am of the opinion that the Deferred Zone proposed in PC2 is consistent with the approach undertaken to rezone land in Prebbleton in recent years and is appropriate under the circumstances.
- 5.60 Two submission points identify that the density of development proposed will place a strain on community resources, such as the Primary School, road network, sewer, water supply and public transport [**S1408.03** – *A Berry and 1411.01* – *D Schurgers*]. These two submission points are supported by one further submission respectively [**F1412** – *G Craig*]. One similar submission point seeks assurances that the necessary investment will be given to easing the current pressure on what they believe is already stretched infrastructure in the township [**S1418.05** – *B & D Craddock*]. One further submission was lodged in support of this submission point [**F1412** – *G Craig*].
- 5.61 **Assessment:** The PSP has investigated the infrastructure requirements, public transport needs and necessity for an additional school based on the projected households in the township up to 2041. This takes into account the additional households proposed in PC2 and the projected population growth anticipated for Prebbleton over the next 30 years.
- 5.62 Environment Canterbury and the Ministry of Education have confirmed that additional bus services and school are not required when assessed against the 30 year population projections. Council is also progressively upgrading the road network and infrastructure services through implementing Asset Management Plans and the capital works programme identified in the Long Term Council Community Plan.
- 5.63 The consistency of PC2 with the PSP confirms that development is able to be co-ordinated in a manner that will avoid any undue strain on existing infrastructure, services and community facilities. Council's Asset Manager: Utilities has reviewed the application and confirmed that there are no fundamental concerns with the provision and operation of infrastructure to the Living XA (Deferred) Zone.
- 5.64 One submission point seeks reassurance that an existing soak pit, thought to be located on the subject land in close proximity to the existing residential area, is recognised and factored into any development of the site [**S1421.03** – *P Reveley*]. This is to avoid any adverse drainage problems caused to the submitter's land, who has experienced run-off from the property during high rainfall events.
- 5.65 A similar submission raises concerns that the new subdivision may increase the risk of flooding into adjacent properties [**S1422.03** – *G & R Savage*]. One further submission was lodged in support of this submission point [**F1412** – *G Craig*].
- 5.66 **Assessment:** The application identifies that the treatment and disposal of stormwater to ground is the preferred method given the nature of the soils and the limited stormwater reticulation available to service the site. A number of comprehensive measures to ensure that stormwater and associated run-off are treated and disposed of within the development site are outlined in PC2.

¹⁶ Resource consents have recently been lodged with Environment Canterbury to establish and operate the ESSS. Notices of Requirement to designate the necessary land for the ESSS have been lodged with Selwyn District Council and are expected to be notified shortly. The modular plant and associated land proposed as part of the ESSS will be sufficient to cater for the treatment and disposal of reticulated wastewater in the UDS Area of Selwyn District for the next 100 years.

¹⁷ Land in Prebbleton that has been zoned, and in some circumstances consented, pending the availability of reticulated wastewater connections – Living X (Deferred), Living 1A (Deferred), Living 2A (Deferred), Living 1A5 (Deferred) and Business 1 (Deferred).

- 5.67 Councils Asset Manager Utilities has confirmed that more specific investigations will be required at the subdivision consent stage to ensure that stormwater is appropriately managed, including the need to obtain the necessary stormwater discharge consents from Environment Canterbury. No impediments to the efficient treatment and disposal of stormwater have been identified and the site is some distance from the high water table and flood prone land in Prebbleton, which is to the east of Springs Road.

RECOMMENDATION:

That for the reasons discussed above, submissions **1406.04, 1417.01, 1408.03, 1411.01, 1418.05** and further submission **F1412** be **REJECTED** and submissions **1421.03** and **1422.03** and further submission **F1412** be **ACCEPTED IN PART**.

(v) Nuisance effects

- 5.68 Several submitters seek compensation payments for any extra cleaning costs incurred as a result of earthworks, including dust and airborne pollution [**S1410.02** - *B Jeurson, 1420.01* – *H Steer* and **1421.02** – *P Reveley*]. One further submission supports these submissions [**F1412** - *G Craig*]. Two similar submission points seek clarification of the measures proposed to mitigate noise nuisance and requested that notice be provided several months prior to construction commencing on the site [**S1410.01** – *B Jeurson* and **1422.04** – *G & R Savage* respectively]. One further submission supports these submissions [**F1412** - *G Craig*].
- 5.69 **Assessment:** The District Plan currently includes provisions to reduce nuisance effects in a general sense, by prescribing noise limits and controlling earthworks for example. It is also standard practice to prescribe conditions on resource consents requiring development works to comply with an approved Earthworks Management Plan¹⁸.
- 5.70 I believe the submissions and further submission raise valid resource management issues, but that the appropriate time to address these concerns is when the necessary resource consents are sought to develop the Living XA (Deferred) Zone, should it be incorporated into the SDP. In my view it is not necessary to require any additional provisions to be included in PC2 to avoid, remedy or mitigate potential nuisance effects.

RECOMMENDATION:

That for the reasons discussed above, submissions **1410.01, 1410.02, 1420.01, 1421.02** and **1422.04** and further submission **F1412** be **ACCEPTED IN PART**.

(vi) Reserves

- 5.71 One submitter requests that the subject land be developed as an 18.58ha park or left in its current rural state [**S1406.05** – *K Gillespie*]. This submission is supported by one further submission [**F1412** – *G Craig*].
- 5.72 **Assessment:** The PSP has identified the reserve land required for the projected population of the township up to 2041. This includes a 10ha extension to Prebbleton Domain and a number of local reserves throughout the PC1 'Greenfield' development areas of the village. This reserve provision has been determined on a per capita and spatial proximity basis¹⁹. The PSP provides a degree of certainty to the community and

¹⁸ An Earthworks Management Plan as part of the conditions of a resource consent typically include measures such as restricted hours of operation, installation of noise dampers on heavy machinery, measures to contain silt laden run-off, suppress dust, limit the time and extent of earth exposed, compensation for any damage to property arising from development works and the provision of contact details of site manager's and other health and safety information.

¹⁹ PSP: 4ha of active recreation reserve per 1,000 residents and passive reserves within a 400m radius of Living zoned land

Asset Managers on the capital expenditure and rates projected for the next 30 years, and ensures the current and future residents would be provided with quality passive and active reserves as the township grows.

- 5.73 There are two open space reserves, and a further two stormwater reserves, incorporated in the proposed PC2 ODP to provide for the direct needs of the future residents of the subject site and those living on the periphery. This reserve provision generally aligns with the preliminary ODP prepared for the PSP (see **Attachment D**).
- 5.74 In my opinion, size and location preclude the sites appropriateness for a reserve based on the previous needs analysis undertaken by Council. The retention of the property in rural land would compromise the ability to achieve the urban consolidation and strategic planning of Prebbleton espoused in the District Plan, UDS, PC1 and the PSP, and could contribute to adverse reverse sensitivity effects to the extent that the viability of ongoing rural productivity could be undermined.
- 5.75 One submission point requests that shade or shelter be provided if the Williams Street playground is extended [**S1408.04** – *A Berry*]. This submission is supported by one further submission [**F1412** – *G Craig*].
- 5.76 **Assessment:** The specific layout, use and type of playground equipment for the expanded Williams Street reserve cannot be determined until additional land is vested in Council and the necessary asset management plans and capital expenditure is finalised. There are no additional provisions considered necessary or appropriate in the context of PC2 to address the submission and further submission point.
- 5.77 One submission point supports the proposed extension to the Williams Street children's playground [**S1405.03** – *J Dixon*].
- 5.78 **Assessment:** This submission is supported as the proposed playground extension forms part of the future reserve network identified for Prebbleton to meet the current and future recreational and amenity needs of the community.

RECOMMENDATION:

That for the reasons discussed above, submissions **1406.05** and **1408.04** and further submission **F1412** be **REJECTED** and submission **1405.03** be **ACCEPTED**.

(vii) Outline Development Plans (ODPs) and District Plan provisions

- 5.79 One submitter raises a number of queries and suggests amended planning provisions relating to the ODP and District Plan rules being sought in PC2 [**S1419.01**, **1419.02**, **1419.03**, **1419.04** and **1419.05** – *D & P Williams*]. One further submission supports Submission point 1419.01 [**F1412** – *G Craig*]. The specific ODP requirements and District Plan rules are summarised below, with my assessment and recommendation identified against each point. Section 8 details the modifications to the Living XA (Deferred) zone provisions that are proposed at the conclusion of this report.
- 5.80 The submitter requests that proposed Rule 12.1.3.33 be moved to the land use section of the District Plan as new Rule 4.9.12 under the heading Prebbleton on Page C4-007. Alternatively, the matter of building setbacks should be addressed as a subdivision assessment matter or via a resource consent [**S1419.01**].
- 5.81 **Assessment:** I concur with the submitter's relief that proposed Rule 12.1.3.33 is better located in the Buildings and Building Position Section of the SDP as new Rule 4.9.12. This reinforces the restriction identified in the ODP prepared for PC2. Any subdivision consents to create residential allotments should also reflect this restriction via consent notices registered on the certificates of title of affected properties. I believe the Living XA (Deferred) Zone rules should be amended accordingly [see Section 8 – Amendment 14].

- 5.82 The submitter requests that proposed Rule 12.1.3.34 be deleted to avoid unnecessary duplication, or alternatively, existing Rule 12.1.3.21 be amended to include the requirement for the LXA (Deferred) Zone to accord with Appendix 19 (ODP's) **[S1419.02]**.
- 5.83 **Assessment:** I concur with the submitter's relief that proposed Rule 12.1.3.34 is superfluous to requirements and that existing Rule 12.1.3.21 should be amended to include the Living XA (Deferred) Zone so that future development accords with the ODP proposed for Appendix 19 [see Section 8 – Amendment 15].
- 5.84 The submitter seeks an amendment to proposed Rule 12.1.3.35 to specify the minimum width of the planting required for the 'landscape buffer' in order to retain a restricted discretionary status. It is identified that a 5m buffer should be provided in the proposed PC2 ODP **[S1419.03]**.
- 5.85 **Assessment:** Mr Craig identifies the need to provide additional wording to specify the treatments for the 'landscape buffer' so that adequate screening is achieved along the interface with the Kingcraft Drive EDA. I believe the Living XA (Deferred) Zone rules should be amended accordingly Section 8 [Amendments 11 and 12].
- 5.86 The submitter identifies that the proposed wording for Table C12.1 is unnecessary as there is no need to obtain either a Council resolution or resource consent to uplift the deferral on the land. In any event, the necessary provisions already exist in the 'Standards and Terms' of subdivision District Plan subdivision standards in Prebbleton **[S1419.04]**.
- 5.87 **Assessment:** It is considered that the proposed wording be retained to ensure consistency with the wording provided for the other Deferred Zones in Prebbleton. Table 12.1 clearly sets out the mechanisms for uplifting the deferral on land in Prebbleton. Furthermore, the PC2 wording reiterates the mixed densities proposed in the Living XA (Deferred) Zone. Section 8 includes additional amendments to facilitate the amended allotment sizes provided in the amended ODP [Amendment 7].
- 5.88 I believe it is also necessary to include the Living XA (Deferred) Zone in the General Policies list of deferred zones under the heading 'Reticulated Sewage and Deferred Zoning' to include the Living XA (Deferred) Zone in the list. I believe the General Policy relating to the Preferred Growth Option for Prebbleton should be amended accordingly (see Section 8 – Amendment 10).
- 5.89 The submitter requests a number of changes to the proposed subdivision assessment matters, including: (1) Either delete proposed assessment matter 12.1.4.37 or redraft it to achieve the intended purpose; (2) Amend proposed assessment matter 12.1.4.38 relating to the 5m building setback to address submission points 1419.01 and 1419.03 above; and (3) Delete proposed assessment matters 12.1.4.39 and 12.1.3.40.
- 5.90 **Assessment:** Having reviewed the proposed assessment matters against the existing SDP provisions, it is considered that the ODP and the suggested modifications to the Living XA (Deferred) Zone outlined in Section 8 [Amendments 15 to 18] achieve the necessary environmental outcomes without the need for additional assessment matters. Proposed assessment matters 12.1.4.37, 12.1.4.38 and 12.1.4.39 should therefore be deleted. Proposed assessment matter 12.1.4.40 should be retained as it promotes the compatibility of the road network and associated structures with other successful developments in Prebbleton.
- 5.91 One submitter supports the provision of connections from the development site through the Meadows Mushrooms property to Springs Road **[S1458.02 – ECan]**.
- 5.92 **Assessment:** PC2 currently presumes that the Meadow Mushrooms site will continue to operate from their current property in the centre of Prebbleton. However, confirmation has been provided by the land owner that the current operations are likely to be relocated from the site in the medium to long term. This is acknowledged in the PSP, where a potential future use of the site as a community precinct and mixed use

activities are identified as being suitable land uses that would benefit the make up of the township.

- 5.93 A preliminary ODP has been incorporated into the PSP that identifies the anticipated road network linking the subject land with the Meadow Mushrooms site and Springs Road to the east (see **Attachment D**). This ODP seeks to promote connectivity between the village core to the western outskirts of the township, which includes the residential housing, reserves and destinations either within or in close proximity to the subject land. The ability to provide these possible future connections will be lost if they are not recognised in PC2. Mr Owen verifies the need for an additional road connection linking the subject land to the Meadow Mushrooms site to the east. The applicant has now provided this additional linkage to address the relief sought in submissions (see **Attachment B**).
- 5.94 One submitter requests an amendment to the PC2 ODP to include a road linkage and an extension of the proposed landscape buffer treatments between the development site and the submitter's land on the southern boundary [**S1419.06 – D & P Williams**]. One further submission supports this submission [**F1458 – ECan**].
- 5.95 **Assessment:** The submitter's land has subsequently been identified as a 'Greenfield' development area SP4 in PC1. This is recognised in the PSP, where the use of the land to the south of the subject site has been identified for residential development that will benefit the overall make up of the township.
- 5.96 A preliminary ODP has been incorporated into the PSP that included the anticipated road network linking the subject land with the SP4 'Greenfield' land to the south (see **Attachment D**). This ODP seeks to promote connectivity between the village core to the western outskirts of the township, which includes the residential housing, reserves and destinations either within or in close proximity to the subject land. The ability to provide these possible future connections will be lost if they are not recognised in PC2. Mr Owen verifies the need for additional road connections linking the subject land to the 'Greenfield' land to the south.
- 5.97 The amended ODP and addendum assessment provided in **Attachment B** now provides this linkage and higher densities along the interface between the PC2 land and the PC1 residential 'Greenfield' land to the south. I support the removal of the landscape buffer treatment along the given that the adjoining land has been identified for future 'Greenfield' development.
- 5.98 I also support the proposed amendments to the ODP to amend the 1,000m² lots along the southern boundary as far as the connection to the Waratah Park development to 600m² to 900m². These changes will ensure that: (a) The overall yield of the PC2 land satisfies the minimum densities of 10 households per hectare prescribed for Prebbleton 'Greenfield' residential areas in Policy 11 of PC1; and (b) PC2 aligns with the integrated development of the town outlined in the PSP.
- 5.99 This may increase the risk of reverse sensitivity effects arising with the ongoing operation of the Trent's Berry Farm in the short term. However, the amended densities will promote a more contiguous form of residential development in the long term and the submitter's land is already recognised for lifestyle rather than rural purposes through the Kingcraft Drive EDA Zoning. As a result, I am supportive of the PC2 ODP being amended to include higher densities along the southern boundary but to retain the lower densities and landscape buffer treatment along the western boundary of the Living XA (Deferred) Zone (see **Section 8 – Amendment 2**).
- 5.100 As discussed previously, I have concerns that the amended densities for Area B may result in additional effects over and above what were anticipated when the request was publicly notified and whether all potentially affected parties have been given the necessary opportunity to consider and lodge submissions on the change.
- 5.101 There are some general submission points that could be addressed through the proposed increase in densities [**S1419.06 – D & P Williams and S1415.02 – P & J Francis**]. However, the weight able to be afforded to these submissions in facilitating the proposed change is subjective depending on how the relief sought in submissions

is interpreted. It is for these reasons that I support the changes in principle, but believe that they are not within scope.

- 5.102 One submitter supports an exemption to Rules 5.1.1.4 and 5.1.5.5 of the District Plan and requests that footpaths are provided on both sides of the roads proposed in PC2 [**S1458.01** – *ECan*]. One further submission supports this submission [**F1412** – *G Craig*]. One similar submission point identifies that PC2 and the ODP fails to fully have regard to the UDS and Selwyn District Council's Walking and Cycling Strategy [**S1458.03** – *ECan*].
- 5.103 **Assessment:** Mr Owen has considered this matter and confirmed that the Living XA (Deferred) Zone provisions align with the District Plan specifications for road infrastructure. It is further noted that the road cross-sections detailed in the ODP provide for a dedicated cycle way and pedestrian footpath that is separated from the vehicle carriageway to promote alternative modes of transport and road safety.
- 5.104 It is therefore believe that PC2 has given sufficient regard to the UDS, PC1 and Council's Walking and Cycling Strategy.

RECOMMENDATION:

That for the reasons discussed above, submissions **1419.04**, **1458.01**, **1458.03** and further submission **F1412** be **REJECTED**, and submissions **1458.02**, **1419.01**, **1419.02**, **1419.03**, **1419.06** and further submission **1458** be **ACCEPTED** and submission **1419.05** be **ACCEPTED IN PART**.

(viii) Natural habitat

- 5.105 One submission point opposes PC2 as the conversion of the rural land holding to residential densities will further reduce bird habitat [**S1406.03** - *K Gillespie*]. This submission was supported by one further submission [**F1412** - *G Craig*].
- 5.106 **Assessment:** The subject land offers limited bird habitat due to the current agricultural use of the land. The exception to this is a cluster of oak trees located in close proximity to the homestead, and intermittent hedging on the periphery of the site. I believe that the establishment of domestic gardens, reserve areas, street trees and associated landscaping arising from the implementation of PC2 would offer significantly more habitat and food sources for birds in the area than what is currently the case.
- 5.107 Although not directly raised by submitters, I take this opportunity to identify two mature oak trees surrounding the homestead. It is understood that these trees are to be retained in the grounds of the homestead once the parent titles are subdivided, should PC2 be adopted.
- 5.108 The applicant has confirmed in the addendum assessment provided in **Attachment B** that they are supportive of the two oak trees being investigated for protection under Council's Plan Change 18 (PC18) process.
- 5.109 I can confirm that Council has received a joint submission from Selwyn District Council and the applicant requesting that these two trees be investigated for protection under PC18. This submission highlights that the trees contribute to the village character of the township and represent an historic link to the homestead.

RECOMMENDATION:

That for the reasons discussed above, submission **1406.03** and further submission **F1412** be **ACCEPTED IN PART**.

6. SELWYN DISTRICT PLAN – OBJECTIVES AND POLICIES

- 6.1 PC2 provides an assessment of the proposal against the objectives and policies set out in the District Plan. The relevant objectives and policies are detailed in Attachment J. That assessment concludes that overall, PC2 is consistent with the relevant District Plan objectives and policies. I concur with that assessment, with the exception of Policy B4.1.4.
- 6.2 PC2 proposes additional wording to Policy B4.1.4 of the Growth of Townships section of the SDP to outline the zones form and character and to identify its consistency with PC1. This approach is not considered appropriate on the basis of the proposed Living XA (Deferred) zones conflict with the Living X zone description. The preferred Living 1A6 (Deferred) zone is better administered through amendments to Policy B4.1.1, which supports a range of living environments while retaining the overall character of townships. Policy B4.1.4 relates specifically to Living X zones.
- 6.3 Section 8 of this report transfers the proposed Policy B4.1.4 provisions being sought in PC2 to Policy B4.1.1 and includes a number of consequential changes [Amendments 8 and 9]. These proposed amendments will ensure that the Living 1A6 (Deferred) zone is managed by the correct policies and also goes some way to addressing some of the concerns raised in submissions in regards to the compatibility of the proposed Living XA (Deferred) Zone with adjoining residential areas.
- 6.4 The reduction in the higher density housing component of PC2 now ensures that Area C will be consistent with standard residential developments and will not be recognised as 'medium' or 'comprehensive' development.
- 6.5 Overall, it is considered that PC2 is consistent with the other relevant objectives and policies of the District Plan, including the remaining Growth of Townships provisions discussed in Section 3 that identify the appropriate densities and preferred growth options for Prebbleton. If the recommended modifications outlined in Section 8 of this report are adopted, I believe that PC2 would be consistent with the District Plan objectives and policies.

7. STATUTORY ANALYSIS

- 7.1 S74 of the RMA sets out the matters that must be considered in preparing a change to the SDP. Amongst other things, s74 requires the local authority to: (a) Comply with its functions under s31; (b) Its duties under s32; (c) Ensure the necessary matters are stated in the contents of District Plans under s75; and (d) Have regard to the overall purpose and principles set out in Part II, including the Matters of National Importance (s6), the Other Matters (s7) that require particular regard in achieving the purpose of the RMA, and the Treaty of Waitangi (s8).

Section 31

- 7.2 Council's functions under s31 are as follows:
- “(a) the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district”*
- 7.3 PC2 amends the mechanism (zoning, policies and rules) for managing the subject site to ensure its development reflect an efficient use of the land resource. The amended PC2 standards for built development and activities on the site ensure that the Living XA (Deferred) Zone will be developed in a consistent manner with the: (a) Living 1 and Living X Zones to the east; (b) Living X (Deferred) Zones to the north of Blakes Road and directly to the south (Waratah Park); (c) Future PC1 'Greenfield' land directly to the south (SP4) and to the north of Blakes Road (SP1); and (d) Kingcraft Drive EDA on the western boundary.

- 7.4 Rezoning the subject land achieves the integrated management of all directly adjoining properties and the wider Prebbleton Township through the provision of an interconnected transport system, safe and direct routes for pedestrians and cyclists, passive open space and stormwater reserves. The scale and density of development is consistent with PC1 and the PSP. The reduced housing densities in Area C will ensure that the limited amount of higher density housing deliver the anticipated environmental outcomes. This will ensure that any future housing developed under the Living XA (Deferred) Zone, should it be formalised, will accord with the character anticipated for Prebbleton.

Section 32

- 7.5 The Council has a duty under s32 of the RMA to consider alternatives, benefits and costs of the proposed change. The s32 analysis is a process whereby initial investigations, followed by the consideration of submissions at a hearing, all contribute to Council's analysis of the costs and benefits of the amended provisions in its final decision making. Having assessed the analysis provided in the request²⁰, I am of the opinion that PC2 is the best approach when considered against s32 of the RMA.
- 7.6 As PC2 is rezoning land and adding specific development controls to the District Plan it is necessary that the final decision-making carefully considers the costs and benefits of the new or amended provisions.

Section 74 and 75

- 7.7 S74 (2)(a) requires a Council to have regard to any proposed regional policy statement, while s74 (2)(b)(i) requires Council to have regard to any management plan or strategy prepared under other Acts. S74 (2A)(a) requires Council to take into account any relevant planning document recognised by an Iwi authority and lodged with the Council. S75 (3)(c) requires Council to give effect to any regional policy statement.
- 7.8 **Canterbury Regional Policy Statement:** Chapter 12 of the RPS - Settlement and the Built Environment, is primarily concerned with the outward expansion of urban areas and the protection of regionally important infrastructure, such as Lyttelton Port and Christchurch Airport. PC2 is not in conflict with any of the objectives and policies of this chapter of the RPS.
- 7.9 Chapter 7 of the RPS - Soils and Land Use, is concerned with the protection of the life supporting capacity of soils and in particular, minimising the irreversible effects of land use change on versatile soils. It is understood that the development site is comprised of Class II Versatile Soils (Land Use Capability)²¹, which according to the application represent approximately 0.06% of the versatile soils in Canterbury. I concur with the application where it concludes that the wider strategic benefits of developing the site in a sustainable and compact form to meet the projected growth patterns of Greater Christchurch outweigh the relatively minimal impacts this will have on the versatile soil resource²².
- 7.10 As outlined in Section 3 of this report, the rezoning of the land is consistent with the objectives, policies and urban growth principles espoused in PC1 to the RPS.
- 7.11 **Canterbury Natural Resources Regional Plan (NRRP)²³:** The NRRP sets a framework to assist in ensuring the integrated management of the region's natural and physical resources, and to control the use of land.
- 7.12 PC2 is considered to be consistent with the NRRP as it will be required to provide future households with connections to reticulated water and wastewater services. An application for resource consent to discharge stormwater will be required at the time of subdivision consent, should PC2 be adopted. This will ensure that any potentially

²⁰ PC2 Application Request; Section 7 – Pages 22 to 41, Revision 3 December 2008

²¹ ECan: GIS Versatile Soils dataset www.ecan.govt.nz and RPS – Figure 4: Land Use Capability Classes in the Canterbury Region

²² PC2 Application Request; Paragraph 5.67, Revision 3 December 2008

²³ Environment Canterbury: Canterbury Natural Resources Plan, Operative in part 27.10.2009

adverse environmental effects associated with this aspect of the proposal will be assessed and any measures to avoid, remedy or mitigate these effects will be enforced where necessary. I therefore conclude that PC2 is not inconsistent with the NRRP.

- 7.13 **CRETS²⁴ and the Canterbury Regional Land Transport Strategy (RLTS)²⁵:** The CRETS is a collaborative study focusing on the shortcomings in the strategic transport network in the area to the south and south-west of Christchurch. It details the appropriate methods to achieve the most integrated, safe, responsive and sustainable road network to satisfy the projected demands of the Greater Christchurch Area.
- 7.14 The primary response affecting development in Prebbleton is Stage 2 of the Christchurch Southern Motorway (CSM2), which will entail significant changes to the road hierarchy in and around the township. The Traffic Design Group and AECOM traffic assessments have considered the CRETS upgrades and the existing patterns of vehicle movements in assessing the traffic related effects of PC2. They have both concluded that PC2 is consistent and appropriate in the context of the CRETS.
- 7.15 The RLTS supports the greater use of public transport by encouraging new developments to be located to facilitate access to passenger transport services. The Strategy promotes the greater use of walking (Policy 1.1) and cycling (Policy 1.2). The RLTS also supports the location of housing that supports sustainable transport choices and reduces the need to travel, especially by private motor vehicle (Policy 4.1).
- 7.16 The application at paragraph 5.42 confirms that the majority of the proposed households will be within 500m of the existing bus stops located on Springs Road. In addition, the ODP provides for a comprehensive road network that incorporates appropriate pedestrian and cycling corridors to promote walking and cycling within the Living XA (Deferred) Zone and throughout Prebbleton. This is supported by the PSP. Overall, it is my opinion that PC2 is consistent with the CRETS and the RLTS.
- 7.17 **Walking and Cycling Strategy and Action Plan (WCSAP)²⁶:** The WCSAP seeks to develop and promote walking and cycling as a means of transport and recreation. It builds on the success of the Prebbleton to Lincoln section of the Christchurch to Little River Rail Trail and the RLTS. The Action Plan describes how the Strategy will be implemented and funded.
- 7.18 As detailed above, the ODP provides for a comprehensive road network that incorporates appropriate pedestrian and cycling corridors to promote walking and cycling within the development and throughout Prebbleton. This network includes connections throughout the existing and future residential areas west of Springs Road, whilst also linking into the Christchurch to Little River Rail Trail and circular network supported in the PSP. PC2 is therefore considered to be consistent with Council's WCSAP.
- 7.19 **New Zealand Urban Design Protocol (NZUDP):** The Council signed the NZUDP in September 2008. The Protocol has been produced by the Ministry for the Environment and aims to make New Zealand's towns and cities more successful through quality urban design. The NZUDP identifies seven essential design elements for quality urban design (the "7Cs").
- 7.20 It is my opinion that PC2 is in accordance with the NZUDP. It promotes a choice of housing in a layout which has been designed to complement the traditional grid pattern of older parts of Prebbleton. It provides connections to adjacent land for future development and uses a connected road network which is generally considered to be both environmentally sustainable and healthy.

²⁴ Christchurch, Rolleston and Environs Study: Transportation Study: Transport Strategy Report, September 2007 (CCC, SDC, ECan, NZTA and Christchurch International Airport)

²⁵ Environment Canterbury: Canterbury Regional Land Transport Strategy 2008-2018, July 2008

²⁶ Selwyn District Council: Walking and Cycling Strategy, January 2009

- 7.21 **Subdivision Design Guide²⁷:** The Subdivision Design Guide outlines best practice urban design methods to deliver high quality living environments and public space. Some of the key outcomes of the Subdivision Design Guide are:
- ☐ Connectivity, as measured by a walkable block size of 800 perimeter;
 - ☐ Pleasant open streets with minimal rear sections;
 - ☐ A hierarchical road design with streets that are designed for their intended use; and
 - ☐ Utilising contextual analysis to guide development and preserve existing character.
- 7.22 It is considered that PC2 and the accompanying ODP, in their amended forms, are able to deliver the key outcomes of the Design Guide and will achieve high quality residential environments. There are appropriate connections and associated road hierarchy to compliment the housing densities and ODP layout, which have been based on contextual analyses of the development site and wider area.
- 7.23 **Five Waters Strategy:** Selwyn District Council has adopted a Five Waters Strategy²⁸, which includes seven sustainability principles for the management of water. The 'Five Waters' are stormwater, wastewater, land drainage, water races and reticulated water supply. The Strategy creates the vision and boundaries for Activity Management Plans.
- 7.24 Appendix K of the application provides an assessment of PC2 against the Five Waters Strategy and the seven principles contained within it. I am satisfied that PC2 meets the broad level principles outlined in the Five Waters Strategy.
- 7.25 **Iwi Planning documents:** Te Whakatau Kaupapa: Ngāi Tahu Resource Management Strategy for the Canterbury Region and Te Taumutu Rūnunga Natural Resource Management Plan are the Iwi Management Plans of relevance to PC2. In respect to PC2, the effects land use change may have on the atmosphere and air, land and water and the impact those activities may have on cultural activities, wāhi tapu, wāhi taonga, mahinga kai and ecosystems in general are of interest to Iwi.
- 7.26 To the best of my knowledge there are no sites of historic or cultural significance to Iwi, nor are there specific Tangata Whenua values that require additional protection through PC2. In my opinion, the rezoning of the land subject to PC2 does not present any conflicts or inconsistencies with either of the above Iwi Management Plans and no such matters are identified in the PSP.

Part II Matters

- 7.27 S5 of the RMA requires the Council to manage the use and development of physical resources in a way, or at a rate, that will enable the community to provide for its social, economic and cultural wellbeing while avoiding, remedying, or mitigating any adverse effects of activities on the environment.
- 7.28 It is my opinion that PC2 in its amended form (see [Section 8](#)) better achieves the purpose and principles of the RMA91 than the current District Plan provisions. I base this conclusion on the fact that the proposed rezoning is consistent with the PSP, PC1 and the Town Growth Policies of the SDP, all of which have identified this area of Prebbleton as being suitable for urban expansion.
- 7.29 The Living XA (Deferred) Zone and accompanying ODP are based on sound urban design principles and comprehensive site assessments that will enable a diversity of households to be provided to accommodate the projected population growth in Prebbleton. These factors will ensure the character and amenity of adjoining residents and the wider community is not undermined.

²⁷ Selwyn District Council: Design Guide for Residential Subdivision in the Urban Living Zones, Adopted 23.09.2009

²⁸ Selwyn District Council: Five Waters Strategy, August 2009

- 7.30 There are no Matters of National Importance listed in s6 that are considered to be of relevance to PC2.
- 7.31 The following Other Matters under s7 are considered to be of particular relevance to PC2:
- (b) The efficient use and development of natural and physical resources;
 - (c) The maintenance and enhancement of amenity values;
 - (f) Maintenance and enhancement of the quality of the environment.
- 7.32 In my view, the efficient use of the existing resources of the land that is subject to PC2 and the maintenance of the surrounding amenity values are of primary concern. The subject land has been identified for urban intensification through Environment Court decisions on the SDP, and more recently through PC1 and the PSP. The planning provisions and ODP, as amended by the changes detailed in Section 8 of this report, will deliver housing densities that are compatible with the surrounding land uses and entail integrated development to high urban design standards. The PSP identifies that the development of the site to the densities proposed will not undermine the existing character of Prebbleton. It is for these reasons that I believe PC2 is able to satisfy the relevant Other Matters detailed in s7 of the RMA.
- 7.33 There are no known sites of significance or specific cultural values affecting the development site and Iwi have been consulted as part of the RMA process. The Treaty of Waitangi has been considered in assessing the PC2.
- 7.34 In conclusion, it is my opinion that PC2 in its amended form is able to better achieve the purpose of the RMA than the current District Plan provisions.

8. RECOMMENDATION

- 8.1 My recommendations on submissions are set out in Attachment I.
- 8.2 On the basis of the discussion in this report, it is my recommendation that proposed PC2 be accepted, subject to the following modifications (Changes to the SDP text are underlined and deletions are ~~striktthrough~~ text):

RECOMMENDED MODIFICATIONS TO PC2

Amendment 1:

Rename all references to the Living XA (Deferred) zone in PC2 to the Living 1A6 (Deferred) zone.

Comment: The Living XA (Deferred) zone description is inconsistent with Table A4.4 – Description of Townships zone, which defines ‘Living X’ zones as [A4-011]:

“Areas zoned as Living but not yet developed. The developer may choose the residential density for the zone, but it may not be more than that of the Living 1 zone in the township”.

PC2 proposes densities higher than the 800m² average minimum lot size in the Living 1 zone of Prebbleton. The proposed Living 1A6 (Deferred) zone is consistent with other zone descriptions in Prebbleton and will avoid any confusion in administering the District Plan. The Council proposes to consolidate the zone descriptions in Prebbleton as part of the forthcoming PC21 to formalise the PSP into the SDP and to incorporate a more strategic approach to managing development in the township.

Amendment 2:

Amend the Outline Development Plan [E-019], as detailed in **Attachment B**, if it is deemed to be within scope. This will confirm the amended Area B (600m² to 900m²) densities along the southern boundary with the PC1 SP4 'Greenfield' land and retain the landscape buffer treatment along the full extent of the western boundary of the Living 1A6 (Deferred) zone.

Amendment 3:

Amend proposed Amendment 2 of PC2 to change the zoning on the Planning Map 13 from Living XA (Deferred) zone to Living 1A6 (Deferred) zone in accordance with **Amendment 1** above.

Comment: The proposed Living 1A6 (Deferred) zone is consistent with other zone descriptions in Prebleton and will avoid any confusion in administering the District Plan.

Amendment 4:

Delete proposed Amendment 3 of PC2, which seeks to incorporate the Living XA (Deferred) zone into Table 4 [A4-010].

Zone	Description
Living XA (Deferred)	Areas zoned as living but not yet developed. Subdivision shall achieve a minimum of 10 lots per hectare with consideration given to maintaining and reinforcing the rural urban interface with lots of not less than 1000m² along the common boundary of the Kingcraft Drive Existing Development Area."

Comment: The Living 1A6 zone description detailed in **Amendment 1** above negates the need to update the General Zone descriptions outlined in Table 4 of the District Plan and proposed Amendment 3 of PC2.

Amendment 5:

Delete proposed Amendment 4 of PC2, which seeks to include the Living XA (Deferred) zone into the Residential Strategy section of the Growth of Townships description [B4-002].

~~"Section 4B.1~~

~~Existing residential areas have a similar density in the new plan, to the existing density. The residential density in new Living zones or undeveloped Living zones (Living X, and Living XA (Deferred)) is determined by the subdivider, but is not more dense than the density in the Living 1 zone for the township, except for identified Greenfield site where the Regional Policy Statement requires otherwise."~~

Comment: The Living 1A6 zone description detailed in **Amendment 1** above negates the need to update the Residential Strategy introduction to Growth of Townships description.

Amendment 6:

Delete proposed Amendment 7 of PC2.

Table C4.1 Site Coverage Allowances

Zone		Site Coverage
Living XA (Deferred)	Prebleton	35%

Comment: The amended Living 1A6 (Deferred) zone will default to the Living 1 zone site coverage restriction of 35% set out in Table C4.1 [C4-005].

Amendment 7:

Reference the amended densities provided in the addendum assessment and updated ODP into Table C12.1 Allotment Sizes (proposed Amendment 10 of PC2) so that the allotment sizes for the Living 1A6 (Deferred) zone reads as follows [C12-009]:

~~“...Area A on ODP: minimum net site area of 1,000m². Area B on ODP: lot size to be contained within a range of 600m²—900m². Area C on ODP: average lot size to be contained within a range of 400m²—600m².”~~

“...Area A: 1,000m² minimum net allotment area. Area B: 600m² minimum net allotment area and 900m² maximum net allotment area. Area C: 550m² minimum average allotment area and 450m² minimum net allotment area and...”

In all cases development shall proceed in accordance with the ODP and shall achieve a minimum density of 10 lots/hectare once the entire site has been developed”

Comment: This amended wording goes some way to ensuring PC2 aligns with the PC7 and the PSP, while also reducing the housing densities within the inner core of the development site to land holdings that are of standard, rather than medium, household densities.

Amendment 8:

Delete proposed Amendment 5 of PC2 [B4-005]:

~~“Policy B4.1.4~~

~~Allow choice in housing density in Living X and Living XA (Deferred) Zones, provided, provided that development in the Living Z zone is not more dense than that for the Living 1 zone(s) in the township, and that development in the Living XA (Deferred) Zone is consistent with the density provisions of Chapter 12A of the Regional Policy Statement, and has regard to the form and character of development in the adjacent living zones, with a particular emphasis on maintaining residential lots of not less than 1000m² along the common boundary of the Kingcraft Drive Existing Development Area.~~

Amend existing Policy B4.1.1 to include the (a) reference as follows [B4-003]:

Policy B4.1.1 (a)

Provide for a variety of allotment sizes for erecting dwellings in Living 1 Zones, while maintaining average section size similar to that for existing residential areas in townships.

Add Policy B4.1.1 (b) as follows [B4-003]:

Policy B4.1.1 (b)

“Facilitate and that development in the Living 1A6 (Deferred) Zone in Prebbleton where it is consistent with the density provisions of Chapter 12A of the Regional Policy Statement, and has regard to is compatible with the form and character of development in the adjacent living zones, with a particular emphasis on maintaining residential lots of not less than 1000m² along the common boundary of the Kingcraft Drive Existing Development Area.”.

Comment: These amendments are considered necessary as they are: (a) More specific and prescriptive; (b) Consequential to removing the reference to the Living XA Deferred Zone and its inconsistency with the Living X zone statement (as per **Amendment 1** above); and (c) Goes some way to addressing some of the concerns raised by submitters in regard to the compatibility of development with existing residential forms.

Amendment 9

Delete proposed Amendment 6 of PC2 [B4-005]:

“Explanation and Reasons

~~Living X and Living XA Deferred zones are areas zoned for residential development...Policy B4.1.4 requires residential density for the Living X zone to be no greater than the Living 1 zone for the township, to maintain the ‘spacious’ character identified in Objective B4.1.1. Higher density residential areas can be provided for in Business 1 zones. Policy B4.1.4 also requires development of the Living XA Deferred zone to be consistent with the density provisions of the Regional Policy Statement, whilst having regard to the form and character of development of the adjacent living zones. This is to ensure development proceeds in a sustainable and compact manner, without adversely impacting on the ‘spacious’ character of existing development in the vicinity of the site.”~~

Add the following wording as a second paragraph to the existing ‘Explanation and Reasons’ section of Policy B4.1.1 [B4-003]

“Policy B4.1.1 (b) also requires development of the Living XA Deferred zone to be consistent with the density provisions of the Regional Policy Statement, whilst having regard to the form and character of development of the adjacent living zones. This is to ensure development proceeds in a sustainable and compact manner, without adversely impacting on the ‘spacious’ character of existing development in the vicinity of the site.”

Comment: These amendments are considered necessary as they are consequential to removing the reference to the Living XA Deferred Zone and its inconsistency with the Living X zone statement (as per **Amendments 1** and **8** above).

Amendment 10:

Include the Living 1A6 (Deferred) Zone in the list of deferred zones under Policy B4.3.59 - General Policies that relate to the Preferred Growth Option for Prebbleton as follows [B4-058]:

“However, in recognition of the appropriateness of land at Prebbleton meeting the specific policies above, the Council rezoned limited areas of land that adjoin existing Living 1, Living X or Business 1 zoned land as either Living X (Deferred), Living 1A (Deferred), Living 2A (Deferred), Living 1A5 (Deferred), Living 1A6 (Deferred) or Business 1 (Deferred).”

Comment: The inclusion of the reference to the Living 1A6 (Deferred) Zone provides additional clarification that the deferral relates to the availability of connections to public reticulated sewage treatment and disposal systems. This compliments the matters outlined in Table C12.1 (Amendment 10 of PC2), which prescribe the process required to be undertaken to uplift the deferral. The change is consequential to **Amendment 1** above, but also will assist in interpreting and administering the District Plan.

Amendment 11:

Amend proposed new Rule 12.1.3.35 (i) (proposed Amendment 9 of PC2) to read as follows [C12-006]:

“...Native shrubs shall provide under planting to this tree row and shall be spaced at no more than 3m centres and that this area is to be fenced along all boundaries.”

Comment: These amendments are considered necessary to achieve adequate vegetative screening along the interface between the Kingcraft Drive EDA and the Living 1A6 (Deferred) Zone, and that the location and extent of this area is demarcated so as to be readily identifiable for implementation and maintenance

purposes. It is noted that fencing can be transparent and it is recommended that this comprises rural style post and wire construction (as per proposed Rule 12.1.3.36 – Amendment 9 of PC2).

Amendment 12:

Insert a new paragraph (iv) into proposed new Rule 12.1.3.35 (Amendment 9 of PC2) to read as follows [C12-006]:

“Rule 12.1.3.35

In the Living 1A6 (Deferred) Zone, any subdivision plan shall be accompanied by a landscape plan detailing plantings to be undertaken:...

... (iv) and any subdivision of land within the area shown in Appendix 19 shall be in accordance with the development plan shown in that Appendix. Prior to the issue of any completion certificate under Section 224 of the Act, a restrictive covenant in the form of an appropriate legal instrument acceptable to the Council shall be registered in favour of the Council requiring: (i) The ongoing maintenance and retention of the landscape mitigation in accordance with the approved landscape plan; and (ii) The restriction of buildings within the landscape buffer identified in the Appendix 19 ODP.”

Comment: This additional provision will ensure that the landscape mitigation required in proposed new Rule 12.1.3.35 is maintained in perpetuity, to the necessary standard, in accordance with the ‘approved’ Landscape Management Plan.

Amendment 13:

Amend Rule 12.1.3.37 (Amendment 9 of PC2) to read as follows [C12-006]:

“In the Living 1A6 (Deferred) Zone, any fencing along a boundary adjoining a reserve or pedestrian accessway shall be limited to a height no greater than 1.2m and that no fencing be permitted within the minimum building setback from any road boundary.”

Comment: The addendum assessment provided in **Attachment B** confirms the fencing restrictions to be applied to the Living 1A6 (Deferred) Zone, which will default to the Living 1 zone setback of 4m. These amendments are considered necessary to ensure this mitigation measure is implemented through rules in the District Plan.

Amendment 14:

Delete proposed Amendment 9 of PC2 from the ‘Living Zone Subdivision Rules’ [C12-005]:

“Rule 12.1.3.33

~~For the Living XA (Deferred) Zone in Prebbleton, no dwelling shall be sited within 5m of the common boundary with the Kingcraft Drive Existing Development Area, as identified in the ODP contained in Appendix 19.”~~

Insert as new Rule 4.9.9 in the ‘Living Zone Rules’ as follows and make numbering changes to the following rules [C4-008]:

“Rule 4.9.9

For the Living 1A6 (Deferred) Zone in Prebbleton, no dwelling shall be sited within 5m of the common boundary with the Kingcraft Drive Existing Development Area, as identified in the ODP contained in Appendix 19.”

Comment: This reinforces the building restriction identified in the ODP prepared for PC2, which is best located in the land use controls of the SDP. The inclusion as

Rule 4.9.9 will require changes to the following rule number references to ensure that the Living 1 and Living 2 zone provisions are grouped together.

Amendment 15:

Delete proposed Amendment 9 of PC2 to insert Rule 12.1.3.34 into the Prebbleton subdivision provisions [C12-005]:

“Rule 12.1.3.34

~~In the Living XA Deferred Zone in Prebbleton, no dwelling shall be sited within 5m of the common boundary with the Kingcraft Drive Existing Development Area, as identified in the ODP contained in Appendix 19.~~

Amend existing Rule 12.1.3.24 to incorporate the Living 1A6 (Deferred) zone [C12-005]:

“In the Living 1A1, 1A2, 1A3, 2A, 1A6 and any deferred living zone at Prebbleton, any subdivision is in general accordance with the respective concept and/or Development Plans in Appendix 19; and...”

Comment: This will avoid any unnecessary duplication of District Plan provisions.

Amendment 16:

Delete proposed Amendment 11 of PC2 to Assessment Matter 12.1.4.37 and make any consequential numbering changes.

“12.1.4.37

~~In the Living 1A6 (Deferred) zone at Prebbleton, the necessity for large allotments along the common boundary with the Kingcraft Drive Existing Development Area to provide section sizes sympathetic to the character of the adjoining Kingcraft Drive Existing Development Area.”~~

Comment: This assessment matter is not considered necessary as the ODP and **Amendments 11 and 12** above provide surety that the appropriate buffer treatments and building restrictions are provided at the interface of the Living 1A6 (Deferred) Zone and the Kingcraft Drive EDA.

Amendment 17:

Delete proposed Amendment 11 of PC2 to Assessment Matter 12.1.4.38 and make any consequential numbering changes.

“12.4.38

~~In the Living 1A6 (Deferred) zone at Prebbleton, the extent to which landscaping and the 5m building setback along the common boundary of the Kingcraft Drive Existing Development Area, is sufficient to clearly demarcate the rural urban boundary.~~

Comment: This provision is no longer considered to be necessary as **Amendments 12 and 14** above includes land use provisions to control the landscape mitigation and building setbacks, which are also illustrated in the ODP.

Amendment 18:

Delete proposed Amendment 11 of PC2 to Assessment Matter 12.1.4.39 and make any consequential numbering changes.

“12.4.39

~~In the Living 1A6 (Deferred) zone in Prebbleton, the extent to which the subdivision layout achieves a road network width which is suited to their particular function and the design techniques adopted to differentiate between priority roads and pedestrian/cycle network.”~~

Comment: The requirements outlined in the above assessment matters relating to the road network and compatibility of the associated infrastructure with the associated road hierarchy are not considered necessary as they duplicate existing SDP Rules 12.1.4.11 through to 12.1.4.14.
