

#### 13 December 2021

Brookside Road Residential Limited c/- Aston Consulting Ltd PO Box 1435 CHRISTCHURCH 8140

Attention: Fiona Aston

Sent by email to: fiona@astonconsultants.co.nz

Dear Fiona,

PC210082 (PC82): Private Plan Change Request to the Operative Selwyn District Plan from Brookside Road Residential Limited in Rolleston (Brookside Road) – Request for further information

Thank you for your application lodged on behalf of Brookside Road Residential Limited requesting a change to the Operative Selwyn District Plan. In accordance with Clause 23 of Schedule 1 of the Resource Management Act 1991, the following information is requested to enable Council to better evaluate the potential effects of the proposal, the ways in which adverse effects may be mitigated and the nature of consultation undertaken.

## **Identification of Ownership**

- In Table 1, the registered owner of Lot 3 & 4 DP 20007 is identified as Gallina Nominees Limited.
   In paragraph 7 of the application, these titles are identified as the 'former Gallina/Wattie Heinz' site. Council records identify the ratepayer for these titles as Tegal Foods Ltd. Please clarify the owner of Lots 3 & 4 DP 20007.
- Related to this, please clarify whether the lease mentioned in the application expires in 2022 (as mentioned in paragraph 7 of the application) or in 2027 (as identified on page 6 of the s32 assessment).

# **Reverse Sensitivity**

3. Within the plan change request, the potential for reverse sensitivity with Council nearby strategic infrastructure, namely the Pines Wastewater Treatment Plant (Designations D411 and D416) and the Pine Resource Recovery Park (Designation D412) is identified. At paragraph 34, it is identified that, for consistency purposes, the measures proposed in PC73 to address this matter from an odour perspective can be adopted by this request. The ODP goes onto identify a 600m buffer/setback odour constraint, and identifies that dwellings are not permitted in this area, and that no sensitive activities are to be provided for within this same area. Please provide details of



- where this odour constrained area has been measured from. Please identify what measures proposed in PC73 are proposed to be adopted in relation to this request.
- 4. At paragraph 50, the Edwards/Brookside Road corner of the plan change area is identified as the western extent to Rolleston's westward growth, as beyond this, "with suitable intervening buffers" are significant parts of the Council's District infrastructure. Please identify what these intervening buffers are and if any are to be identified within the boundary of the plan change request area. Please clarify if it is necessary to identify these within either the ODP (either on the plan or accompanying text) or as a specific provision within the District Plan.
- 5. Through the hearing process for PC73, proposed provisions were proffered for inclusion within the District Plan that precluded the development of residential allotments within 1500m of the Pines Wastewater Treatment Plant buildings prior to certification by Council's Asset Manager that the resource management approvals required to enable the Plant to provide treatment capacity for 120,000 person equivalents of incoming flow have been obtained or 31 December 2025, whichever is the sooner. Please advise if this measure is also proposed to be adopted in relation to this plan change. If so, please provide a map indicating the extent of the plan change area affected by this measure and identify this within either the ODP (either on the plan or accompanying text) or as a specific provision within the District Plan.
- Please clarify how the land within the Odour Constrained Area identified on the ODP is to be managed and integrated into the development, while ensuring activities sensitive to odour are avoided within these areas.

#### Note:

- i. The full extent of the various Council designations does not appear to be reflected accurately within the plan change request refer to paragraph 34 below. In responding to the above requests, please ensure that the full extent of the designations are mapped appropriately.
- 7. It is noted at paragraph 37 that, if PC73 is approved, it contains a 150m Odour Setback Area from the existing intensive farming operation within this plan change area. As proffered at the hearing, it was proposed that building within this area be a non-complying activity and, within the ODP text, that this restriction be supported by an enduring legal mechanism. As such, the assertion in paragraph 37 that "dwellings are excluded until and if residential subdivision proceeds on the current chicken breeder site or if the chicken breeder site is no longer operating on the site" is incorrect. Further, it is stated that this "request proposes that the removal of the [odour setback area] will enable a more efficient use of the PC73 land for urban purposes" however the request does not include any amendments to this effect. While it is acknowledged that a decision has not yet been made in relation to PC73, should a favourable decision be made in relation to PC73, and Council resolves to accept this plan change (PC82) for notification, please clarify if it is proposed to vary the provisions within PC73 that respond to the existing intensive farming operations with the plan change area.

# **Ecological Assessment**

8. Please provide an ecological assessment of the water race that traverses the plan change area and clarify how this water race is to be treated.



#### Note:

ii. The water race that traverses the plan change area is a continuation of the same water race that traverses the PC73 Holmes Block to the north, and continues along the boundary with the PC73 Skellerup Block before terminating within PC81 to the south. In relation to PC73, and referred to in PC81, feedback from Mahaanui Kurataiao Limited recommended that the infilling of the Holmes Block waterway was avoided and that a minimum 10m setback between all waterways and development be provided. It is also noted that, within the Rolleston environs, some open water areas have been maintained for aesthetic and ecological reasons.

#### Infrastructure

#### Reserves

The plan change request have been reviewed by Mark Rykers, Manager Open Space and Strategy.

- 9. There is a conflict in the information provided in the Urban Design Statement (pages 15-16) and in the ODP (both the plan and accompanying text) on the provision of green space for the proposed development. The Urban Design Statement refers to 4 smaller reserves yet there are 5 shown on the ODP. The ODP commentary refers to the distribution being based on 500m walking radius and in the Urban Design Statement the figure of a 400m walking radius is quoted. Please clarify and provide the rationale for the number of "local" reserves, including the function and distribution of these spaces. This should take into account the surrounding reserves and recreation spaces, including those proposed by other plan change requests, noting that the Council's adopted standard is a 500m walking radius.
- 10. Please clarify if the diagonal green link to the north east to connect with Brookside Road is a separate green corridor or if it follows alongside a road connection.
- 11. The request mentions the location of a water race within the plan change area but does not indicate whether this has the potential to be integrated with open space areas. Has this opportunity been considered?

# Note:

iii. In terms of the "local" reserves, although the Urban Design Statement talks about reserves providing space to service higher density development, most of these are located in the lower density areas. Some are also close (<300m) to either the central reserve or other existing or proposed reserves, such as that proposed in the adjoining Skellerup Block (PC 73). The assessment requested above should assess distribution and provision standards in consideration of Council's adopted levels of service and take account of existing and proposed reserves in close proximity to the plan change area.

#### Water and Wastewater

The Infrastructure Report provided with the plan change request was reviewed by Murray England, Asset Manager Water Services.

12. Please confirm what consented water consents could be transferred to Council to service this proposed plan change.



### Notes:

- iv. Rolleston is expected to see significant growth over the next 30 years and, to meet this growth, capacity upgrades are proposed. Recently Council developed the 2021 31 Long Term Plan which included budget for further development funded capacity upgrades on the Rolleston water supply. As the township grows the consented allocation will be put under pressure. To ensure that growth is appropriately integrated with the provision of infrastructure, and planned growth is able to be serviced, priority of water allocation needs to be given to those developments within the Rolleston Structure Plan area. If development is to occur outside of the Rolleston Structure Plan area then provision of consented water allocation should be provided by the applicant.
- v. Council is currently completing an updated wastewater master planning for the Southern Rolleston area. Although this master plan doesn't include this proposed plan change area, it will provide some guidance to future servicing options. Please contact the Asset Manager Water Services for further information.
- 13. Please advise if there development staging is proposed and if so how will this proceed?

# Transport

The Integrated Transport Assessment provided with the plan change request was reviewed by Mat Collins from Flow Transportation Specialists and Andrew Mazey, Asset Manager – Transportation.

- 14. Please confirm how the plan change will ensure development aligns with the intersection upgrades identified in Section 8.3.2 of the ITA. Further, please confirm how the plan change can respond in the instance that the timing of these upgrades is not brought forward.
- 15. Please confirm how the proposed upgrade for the Goulds Road/Dunns Crossing Road/Selwyn Road intersection will be funded and delivered, noting that it is not funded or programmed in Council's Long Term Plan.

#### Notes:

- vi. Dunns Crossing Road/Selwyn Road upgrade is not programmed or funded by Council.
- vii. Dunns Crossing Road/Lowes Road upgrade is programmed by Council for 2035/36.
- viii. Dunns Crossing Road/Burnham School Road upgrade is programmed by Council for 2035/36, and proposed by PC73 prior to any development.
- ix. Dunns Crossing Road/Main South Road upgrade is funded by Waka Kotahi for 2024.
- 16. Please confirm how development within the plan change will be delayed until the third party intersection upgrades identified in the ITA, and above, are undertaken.

#### Note:

x. It is noted that the request proposes to change Rule 12.1.3.50(a) to address some, but not all of the above identified intersections. Council considers that, where it is proposed that the occupation of dwellings should be restricted until such time as infrastructure upgrades have been completed, it is appropriate that any rule proposed to be incorporated into the Subdivision Chapter of the Operative District Plan be clearer than that proposed and provide that no completion certificate be issued under section 224 of the Act (other than for a



boundary adjustment or creation of an allotment solely for utility purposes), until such time as the identified works has been completed. See Rule 12.1.3.57A for an example.

17. Please provide an assessment of the transport effects of this plan change request on Edwards Road, including the intersection with Ellesmere Junction Road. Where relevant, please also refer to Council Standards and Guidelines in regard to carriageway widths and pavement type.

### Note:

- xi. The ITA notes that there will be a degree of traffic generated by the plan change that will route via the southern portion of Edwards Road, which is not identified in the ODP as requiring an upgrade. Section 9.3 of the ITA recommends that an assessment be undertaken of the southern section of Edwards Road, including the intersection of Edwards Road and Ellesmere Junction Road, prior to the occupation of any dwellings that may gain access to Edwards Road. It is considered that the assessment of the unsealed section of Edwards Road and the intersection with Ellesmere Junction Road should be undertaken as part of the plan change, as delaying this assessment to future subdivision consent stage is unlikely to allow Council to consider the cumulative effect of full buildout within the plan change area. Further, no mechanism is proposed to require the assessment (as proposed in the ITA) prior to occupation of dwellings. As expressed in x. above, Council considers that any limit on the occupation of dwellings due to infrastructure requirements should be included as a rule in the District Plan.
- 18. Please confirm if PC80 and PC81 are represented in the Rolleston Paramics model used to support this plan change request (PC82) ITA. If they are not, please provide an updated modelling assessment which includes these plan changes. Further, please provide the Paramics model files for review.
- 19. Please provide the SIDRA model files for the State Highway 1/Dunns Crossing Road/Walkers Road intersection that have been used for the assessment included in the ITA. Further, please confirm that the SIDRA model includes traffic generated by PC80 and PC81.
- 20. Please provide an assessment of the Dunns Crossing Road/Brookside Road (east) intersection, including any interaction (e.g. queuing effects) between this intersection and the proposed Dunns Crossing Road/Lowes Road roundabout. Please also consider and clarify how existing property access on the northern side would be provided. It is noted in the Urban Design Statement that the termination of part of Brookside Road would allow the existing small enclave to the north to be directly connected to the residential development within the plan change area. As the proposed realignment will have a direct impact on land owners in the vicinity, it is not considered appropriate that this be considered at subdivision stage, as suggested in Section 8.3.2 of the ITA, where opportunity for engagement by and with these property owners is not provided for.
- 21. Please comment on how this plan change request may affect the future performance of Dunns Crossing Road/Newmans Road and Lowes Road/Broadlands Drive.

### Note:

xii. Based on the reviewers awareness of other plan change requests within the area, it is understood that there are potential performance issues indicated in the Rolleston Paramics model that are not reported on within the ITA accompanying this request.



- 22. To assist Council to ensure that the transport network indicated in the plan change request aligns with adjacent future developments being proposed via other plan change requests, please provide an overlay of the OPDs for PC70, PC73 (as modified during the hearing) and this plan change. Please comment on the degree to which the transport network proposed by this plan change request aligns with adjacent future development.
- 23. Please comment on whether a concept design for the Dunns Crossing Road/Lowes Road/Brookside Road intersection has been developed which reflects the assumed form adopted in the SIDRA model, and whether the OPD should identify the need to allow for land protection/vesting to enable this intersection to be formed.

#### Note:

- xiii. It is noted that the existing legal road boundaries at this intersection may mean the intersection needs to be offset from the Dunns Crossing Road centreline.
- 24. Please explain why cycle facilities are not proposed on Brookside Road and Edwards Road along the site frontage, referring to relevant Selwyn District Council cycle facility standards and guideline.
- 25. There appears to be a conflict in Section 8.2 of the ITA and the ODP in terms of the number and location of roading connections between the area of the plan change and the adjoining roading network. For example, three connections are referenced in the ITA to Edwards Road while only two are shown on the ODP and one connection is mentioned to Brookside Road, while the ODP shows two connections. Please clarify and confirm that the modelling undertaken aligns with the ODP proposed.
- 26. Please clarify if direct vehicle access is to be provided for along Dunns Crossing Road. The ODP identifies road frontage upgrades along this road, however Section 9.1.2, paragraph 2, of the ITA, states direct access "could also be provided along the [western] site frontage, however this would need to be considered further at the subdivision stage".

### **Urban Design**

The Urban Design Statement and Character and Visual Assessment provided with the plan change request were reviewed on behalf of Council by Hugh Nicholson of Urban Shift.

- 27. Currently the plan change area is surrounded on three sides by rural land, although there are proposals for residential plan changes to the south and north. In particular the western parts of the PC82 area are a significant distance from the nearest existing residential housing on Dunns Crossing Road. To what extent does the proposed plan change rely on adjacent plan changes to provide a coherent outcome, and what staging or sequencing is necessary to prevent perverse outcomes?
- 28. While realigning Brookside Road with Lowes Road may make sense in terms of vehicle traffic and effects on intersections, the diagonal alignment of Brookside Road currently provides the shortest and most direct route (or routes) into the town centre which is particularly important for pedestrians and cyclists. It is also arguably one of three diagonal roads in a rectangular township that provide legibility and a sense of place in a flat landscape. Please provide some



- further analysis of the necessity for this change and how the positive characteristics of Brookside Road might be retained.
- 29. The existing poultry farm operations and buildings do not appear to have been considered as part of the receiving environment. To what extent do these affect the analysis of the receiving environment and consequently the changes to landscape character and the visual impact?
- 30. Please provide before and after photo simulations of typical Living Z development with any proposed boundary treatments from viewpoints 5 and 6b.
- 31. Are any blue networks proposed and how will stormwater off the streets be treated?
- 32. Are any urban ecological or low impact design initiatives proposed?
- 33. Expert evidence on landscape character and visual impact is generally provided by landscape architects or landscape planners in New Zealand, although on occasion other professionals may be involved as part of a team approach. Please provide evidence of the expert qualifications and knowledge of the author with regard to landscape character and visual impact assessments. Alternatively, a peer review by a qualified and experienced landscape architect may be appropriate.

## **Urban Design Statement**

34. Figure c on page 5 does not accurately reflect the full extent of the designations associated with the Pines Wastewater Treatment Plant. Designation D416 extends south of the area shown down to Brookside Road, as per the figure below. Please acknowledge the full extent of the various designations associated with both the Pines Wastewater Treatment Plan and Resource Recovery Park and advise if the proximity of the designations, being some 180m from the edge of the plan change area has an impact on the site of the plan change request.



Figure 1 Extent of Selwyn District Council Designations (outlined and hatched in red)

35. The figure on page 13 appears to indicate that the scale of the Business 1 zones proposed within the plan change area are of a lessor scale than the Business 1 zones proposed by and within PC73. Similarly, the following commentary, from page 12, expresses that "the commercial activities proposed by PC 73 would provide alternative local commercial centres in closer proximity [to the



town centre]. The Holmes block commercial area would be located 700m from the northern corner of the Site and the Skellerup Block local commercial area would be approx. 800m away from the south-west corner of the Site. Both areas would be within a 10min walking distance." This commentary appears to consider that the commercial areas proposed within PC73 would be such that they could be at a greater scale than that proposed within this plan change area. However, PC73 seeks to provide the same zoning as proposed by this request, namely Business 1 (Local Centre). Please clarify the nature and scale of the Business 1 zone proposed by this request and amend as appropriate.

36. On page 18, under the heading *Rules to Consider under the Operative District Plan*, it is observed that the existing fencing rules within the District Plan create "anomalies for corner sites", creating "visually awkward results". A possible solution is proposed, however this is not reflected in the amendments proposed to the District Plan as part of this request. Please clarify if an amendment is sought to the existing fencing provisions within the District Plan and provide any amendment for consideration.

# **Character and Visual Assessment**

- 37. In Section 3.2, under the heading of *Vegetation*, reference is made to vegetation types in the surrounding rural residential blocks to the south "on Nobeline Drive". Nobeline Drive is located on the eastern side of the Rolleston township, quite some distance from the site of this plan change request. Please review the assessment under this heading and confirm that it relates to the plan change area and amend as appropriate.
- 38. On page 10¹, the commentary suggest that direct access may not be provided from the west i.e. at the Brookside/Edwards Road intersection, and that rural, open style fencing, combined with landscape planting will act as property demarcation towards the road/rural neighbour to the west. The ODP shows that the road frontages in this location will be upgraded. While the two approaches may not be mutually exclusive, please clarify the response to the road frontage treatments proposed in this location. If fencing and landscaping is proposed, please consider if it is necessary to identify this within either the ODP (either on the plan or accompanying text) or as a specific provision within the District Plan. Please also address the appropriateness of any treatment proposed in light of the commentary within the request that the growth of the township to the west is "a logical next step in the sequence of development within the urban growth pattern of Rolleston...".
- 39. Further on page 10, under the heading of *North*, the commentary proposes that the Brookside Road reserve corridor provides sufficient separation to address any potential reverse sensitivities between the existing rural and proposed residential activities by including generous shrub and street tree planting within the road reserve to partially screen dwellings and break up continuous roof scapes. Please clarify the appropriateness of this in light of comments on page 12 and the figure on page 13 of the Urban Design Statement which suggest that the area to the north, between the PC73 Holmes Block and the plan change area could be a residential infill area in the future. If planting is considered to be required in this area to address any potential reverse sensitivities between the existing rural and proposed residential activities, please clarify if it is

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<sup>&</sup>lt;sup>1</sup> The same commentary is made on page 18 of the Urban Design Statement.



- necessary to identify this within either the ODP (either on the plan or accompanying text) or as a specific provision within the District Plan.
- 40. On page 15, under the heading *Rural neighbours,* is it the small rural lifestyle properties to the north across Brookside Road, rather than Dunns Crossing Road, that are being referred to?
- 41. In Section 5 *Mitigation Measures*, although it is identified that the mitigation measures are either covered in the ODP or are already part of subdivision design standards and district planning rules and therefore no specifically tailored mitigation measure are required in relation to the plan change request, it is considered that the following three mitigation matters need to be considered further.
- 42. MM3 seeks that, where practicable, existing individual mature specimen trees may be retained and integrated into the future residential development in suitable locations such as open green spaces, green links or within the road reserve where they can be included without conflict with services and that any decision on any retention of trees should be undertaken at detailed design stage and assessed as part of the subdivision design. Section 3.1 identifies that there are several standalone Eucalyptus trees, 5m to over 15m in height, within the plan change area. This would make them significant trees in the context of Rolleston, in terms of height. Paragraph 197² on page 56 of the application also states that "the plan change seeks to include landscaping within the reserves, and in road corridors, using the existing policy framework (Policy B3.4.33, B4.1.11, B4.2.4, B4.1.13 and Objective B4.2.3)". A number of these policies reference the retention trees on the site as part of new development. Please identify the location of these trees within the plan change area and provide an arborists assessment of the health and suitability of retention of these trees, and any other existing mature trees.
- 43. MM7 (rural fencing and planting at rural interface) and MM8 (road boundary treatment to all boundary roads) suggest measures to mitigate any potential effects on the landscape character, landscape values and/or visual amenity. Please clarify if it is necessary to identify these mitigation measures within either the ODP (either on the plan or accompanying text) or as a specific provision within the District Plan.

### **Geotechnical Assessment**

The Geotechnical Assessment provided with the plan change request was reviewed on behalf of Council by Ian McCahon of Geotech Consulting Limited.

- 44. Please comment on the reason why only about 40% of the plan change area (on two of the five titles) has had any site testing made on it. Please advise if, and why, this is considered adequate for the overall area, or please supply additional test information on the remaining areas.
- 45. Please provide a RMA s106 hazard assessment.
- 46. Please advise whether further testing is required at subdivision consent and building consent stages.

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 $<sup>^2</sup>$  It appears that the paragraph numbering within the request is incorrect, with the numbering jumping from 193 on page 51 back to 179, and continuing on from this throughout the balance of the document. This has the effect of duplicating paragraph numbers 179 – 193.



- xiv. The MBIE Guidance for plan change investigations for subdivisions suggests 0.2 0.5 deep test per hectare. For 110 hectare, this suggests 22 to 55 tests. The number of tests is therefore adequate, but the coverage is confined to less than half of the overall site area. While Mr McCahon notes that this general area is known for the uniformity of deep gravel dominated soil profile, a relatively deep depth to ground water and a general lack of any issue of geotechnical concern, he notes that professional judgement on adequate testing varies widely. As such, while his preference would be for at least some testing on the untested parts of the site to verify that the shallow soil profile is present, he notes that other's judgement that the available information is sufficient, if this is justified.
- xv. While the report concludes that the site is not susceptible to liquefaction due to the deep groundwater and the soil profile, and that an equivalent Foundation technical category TC1 is appropriate, other RMA section 106 hazards are not considered. Although it is most unlikely that any other RMA section 106 hazards are present to the level that would prevent development, this does need to be addressed.

## **Preliminary Site Investigation (PSI) Report**

47. The PSI report provided with the plan change request was reviewed on behalf of Council by Environment Canterbury. No further information is requested following this review.

#### Note:

xvi. Should the plan change be approved, a detailed site investigation will be required prior to the commencement of any large scale earthworks or constructing occurring.

# **Economic Assessments**

- 48. The assessment provided with the application by Insight Economics does not acknowledge the proposed Business 1 zoning included as part of the plan change request, and as such does not proffer any assessment in this regard. The assessment provided with the application by Brown, Copeland & Co Ltd does acknowledge the provision of the two Business 1 zones, which are "intended only to meet the convenience needs of the local residents (and possibly some weekend users of Brookside Park) and will be governed as to scope and scale by the controls for Neighbourhood Shopping Centres contained within the Selwyn District Plan". However, the controls noted that would limit the scale of that retail activity (being a total floor area limited to 450m², and individual tenancies limited to 350m²) are those for local centres (refer to Rule 22.11.1 in the Operative District Plan). Please clarify and amend as appropriate.
- 49. Please provide an economic and/or retail assessment of the viability of the proposed Business 1 (local centre) zones, taking into account the local and neighbourhood centres that are either zoned or proposed to be zoned by way of the various plan change requests in the vicinity of the site e.g. PC70, PC73 and this plan change itself. Please identify the likely catchment of each of the proposed centres and provide a rationale for the proposed centres within this request. Although located outside of the boundary of the Rolleston Structure Plan, please identify how the proposed centres align with the Centres Strategy contained within the Structure Plan. Please identify if, given the growth to the west of the township proposed by the various plan changes, the location of the neighbourhood and local centres proposed within the structure plan is still appropriate.



- Please also consider if a hierarchy of centres should be employed through this proposed west Rolleston growth area.
- 50. In Section 5.4 of the assessment from Insight Economics, and in paragraph 83 of the application, reference is made to generating employment for "3,065 people years". Please clarify what is meant by this statement.

#### Soils

51. Please identify the land use classification of the soils within the plan change area. Please also identify the source of the quote included in Section 5.5 *Foregone Rural Production* in the assessment from Insight Economics.

Note:

xvii. While the request notes several times that the sites does not contain Land Use Classification 1-3 soils, it does not actually identify the land use classification of the soils within the plan change area.

## **Operative District Plan and Outline Development Plan (ODP)**

- 52. As addressed above, Council considers that, where it is proposed that the occupation of dwellings should be restricted until such time as infrastructure upgrades have been completed, it is appropriate that any rule proposed to be incorporated into the Subdivision Chapter of the Operative District Plan be clearer than that proposed and provide that no completion certificate be issued under section 224 of the Act (other than for a boundary adjustment or creation of an allotment solely for utility purposes), until such time as the identified works has been completed. See Rule 12.1.3.57A for an example. Please provided amended wording to the proposed amendment to Rule 12.1.3.50(a) to reflect this, acknowledging all of the infrastructure upgrades required.
- 53. It is also considered that the plan change request will require an amendment to Policy B4.3.77, to identify the specific matters that are identified within the ODP for the area.
- 54. Please clarify how, as expressed in paragraph 203 in the application, the operative "zoning and associated rules (Outer Plains Zone with a minimum lot size for subdivision and a dwelling 20ha)" does not reflect the present intensive shed-based development on Lots 3 and 4 DP 20007. The existing activity would appear to be appropriately reflective of the intent of the operative zoning.
- 55. The ODP text states that the area comprises "approximately 109.7737 hectares..." The area stated is precise, rather than approximate. For the purposes of the accompanying text to the ODP, Council is comfortable if the text states that the area comprises "approximately 110 hectares". Please amend the ODP accordingly.
- 56. The ODP should also be amended to reflect any matters raised in the points in this request for further information.

#### Note:

xviii. It is noted that through the Proposed District Plan process, Council is seeking to establish a consistent ODP design with an approach to minimise features on an ODP and utilise assessment considerations in supporting text. While this is a request to change the



Operative District Plan, please be aware that alignment of the ODP design may be sought as this request progresses.

#### Consultation

- 57. Please advise if the request has been provided to Mahaanui Kurataiao Limited for their comment and provide a copy of any feedback received.
- 58. Please provide evidence of any consultation with the land owners affected by this request.

#### **Process from here**

Once we have received a response to the above requests, it may be necessary to ask for further clarification of the extent to which this response addresses the above requests.

Whist you may decline to provide the above information (Clause 23(6)), you need to be aware that the Council may reject the request on this basis.

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

Please contact me on (03) 347 1809 or jocelyn.lewes@selwyn.govt.nz if you have any questions.

Yours faithfully

Jocelyn Lewes

**Strategy and Policy Planner**