

6 September 2019

R and C Wright  
c/- Baseline Group CLS Ltd  
PO Box 8177  
Riccarton  
CHRISTCHURCH 8440

Attention: Anna Bensemman

Sent by email to:       anna@blg.nz

Dear Anna,

**PC190061: R & C Wright Private Plan Change – Request for further information**

Your application for the above plan change has been assessed for completeness under the First Schedule of the Resource Management Act 1991. A review has been undertaken of the application, with the following further information request being issued, to enable Council to better evaluate the nature and effects of the request (Clause 23(1)):

**National Policy Statement on Urban Development Capacity**

Please provide an assessment against the NPS-UDC. This would particularly look at Policy PA3. Discussion should include; what vacant business land there is in Darfield, broad understanding of uptake in new development in the area, how this development is potentially feasible or commercially viable, and how it may differ to the other business land in Darfield.

**Landscaping**

Can you confirm that the ongoing management of the landscaping will be the responsibility of the landowners?

**Roading**

1. Can you provide further information outlining how the proposal:
  - a. considers roading and walkway connections to Ascot Park to the south. This includes the internal walkway connections depicted on the ODP aligning with Ascot Park subdivision. It is worth noting that the Ascot Park approved subdivision plan differs slightly from the ODP; and
  - b. could provide for pedestrian and cycling access through the north-west of the site to provide safer access to Darfield Township, avoiding the use of SH73.
2. Can you provide further information showing some indicative road and access cross-sections, which can help us understand the basis for the road layout and the level of service being provided to cater for the generated traffic.
3. Can you provide alternative road layout that takes into account the operative plan's restriction on cul-de-sacs of 150m in length, as outlined in appendix 1. This is to provide for safety in emergencies and better access through the development.

Also, there are several notes in appendix 1 from the transport review.

### Outline Development Plan (ODP)

The context map is required to show how it fits with the surrounding development and township. It should show:

1. The site is situated next to a consented subdivision, including Ascot Park and 339 Creyke Rd.
2. The industrial areas over SH73. Please overlay the 300m buffer from the intensive farm to the north.
3. Access to reserves and commercial areas.
4. How it fits within the Darfield Township.

### Air Quality Review

As per our peer review of the air quality report. Can you please respond to the following questions:

1. **Please consider revising the contaminant emission rates using the process specific emission factors, advise how they compare to the emission rates used in the modelling supplied, and assess how the differences would affect the modelling results.**

Some emissions weren't included in the assessment. The assessment covered fuel combustion from the kilns but no other potential emissions from the brick material itself. Contaminant emission rates have been calculated based on fuel consumption rates, using emission factors for coal and oil. Emissions of metals have also been estimated based on the assumed concentrations of metals in the recycled oil. We note that there are emission factors specific to brick drying (see Australian Government NPI Emissions Estimations Technique Manual for Bricks, Ceramics and Clay Product Manufacture and USEPA AP-42, Section 11.3 – Bricks and Clay Related Processes). The emission factors include emissions from the drying of brick material itself as well as the products of fuel combustion used to provide heat to the kilns. These contaminants include metals, fluoride, and VOCs not emitted from fuel combustion itself, so are additional.

2. **Please assess the potential effects of fugitive dust from material storage piles, crushing, grinding and screening operations, and any existing and proposed mitigation measures.**

No assessment of dust caused from manufacturing and where it may drift. We note that there are a number of potential sources of dust from the manufacture of bricks, which are not discussed in the air quality report.

3. **Please provide a discussion of likely background concentrations and an assessment of cumulative results with the kiln discharges.**

Modelling did not include any general background contaminants. Background concentrations of air contaminants have not been included in the assessment for determining cumulative effects of the kiln discharges with background concentrations. Section 5 of the air quality report states that there is no publicly available ambient air quality monitoring data for the Darfield area. The MfE Good Practice Guide for Assessing Discharges to Air from Industry (2016) provides guidance on deriving background contaminant concentrations in the absence of monitoring data.

4. **Please provide a discussion of any potential odour effects from the operation of the kilns and combustion appliances at the site.**

There is no discussion of odour effects from the brick manufacture.

### Provisions

The approach to provisions may need to change to align better with the proposed district plan, with standards linked more to the ODP, though this can be later through the process.

**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.

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

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

Please contact me on (03) 347 1854 or [ben.baird@selwyn.govt.nz](mailto:ben.baird@selwyn.govt.nz) if you have any questions.

Yours faithfully  
SELWYN DISTRICT COUNCIL

Ben Baird  
**Strategy and Policy Planner**

## Appendix 1: Transport Notes

There are several points of note from the Transport review regarding the road layout.

1. The cul-de-sac at the end of the proposed road servicing the business road will need to be a minimum 30m head diameter.
2. The business road is an overly long no exit road. Having that degree of traffic generation only accessible to the wider roading network at one point is inadvisable, providing no resilience if an access is blocked (e.g. in an emergency).
3. The length of the cul-de-sac's are restricted to 150m in length.
4. The road for the living zone seems overly narrow. The provisions would require it to be formed and vested as a minimum 6m wide carriageway.
5. The road for the living zone, whilst indicating continuing through to the adjacent site, should provide for a turn-around space until that road is continued.

Notes regarding the State Highway Adjustment:

1. The adjustment of Creyke Rd to SH73 does not assess the potential impact on access to the North. The current design of the intersection provides for north-south connection. By realigning it, this creates a stagger arrangement that has not been assessed or accounted for, or its appropriateness and how any effects could be mitigated.
2. It is preferred that upgrades to the intersection be done in a single well planned process to avoid ongoing disruptions to local and State Highway traffic.
3. An assessment of lowering the speed limits to provide compliance against NZTA's Speed Limit Guidelines Rules is required. It is understood that lowering the speed is a logical step, the assessment will provide justification.
4. The section of Creyke Rd adjoining the site does not need to be classified as a collector road. The status of the road does not preclude Council requiring a wider seal from SH73 and that new intersection being provided to a standard to include a right hand turn bay and other elements established through consent conditions.