

Notice of Further Submission on Plan Change 5 to the Ashburton District Plan – Ashburton District Council

Resource Management Act – Form 6

Name of submitter: Canterbury Regional Council

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Declaration: We made a submission on this Council-initiated plan change – our submitter ID number is: **S1** and we are a local authority for the relevant area.

Hearing option: We **do** wish to be heard in support of our submission and we would consider presenting a joint case with others who have made a similar submission.

Canterbury Regional Council would like to comment on the submissions of:

Submitter & Submitter ID	Address	Submission points
Ministry of Education S3	c/- Beca Ltd Attention: Sara Hodgson PO Box 13960 Christchurch 8141 Email: sara.hodgson@beca.com	S3.2, S3.5
KiwiRail Holdings Limited S4	Attention: Sheena McGuire Level 1 Wellington Railway Station Bunny Street PO Box 593 Wellington 6140 Email: sheena.mcguire@kiwirail.co.nz	S4.2

Fuel Companies (BP Oil, Mobil Oil, Z Energy) S5	c/- 4Sight Consulting Limited Attention: Phil Brown 201 Victoria Street West Auckland Central Auckland 1010 Email: philipb@4sight.co.nz	S5.1, S5.2, S5.3, S5.4, S5.5, S5.6, S5.7, S5.8
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Where a deletion is sought it is ~~striked-through~~ and where an insertion is sought it is underlined. All amendments to policy wording is in red.

Please find the details of our further submission included in the attached table below.

Yours faithfully



Jeff Smith

Team Leader Planning

We support parts and oppose parts of the following submissions:

This further submission is in relation to the submission of:	The submission point we support or oppose is:	Our position on this submission point is:	The reasons for my/our support or opposition are:	The decision we want Council to make:
Ministry of Education	S3.2	Reject.	Policy 5.3.7 of the CRPS in relation to strategic land transport network and arterial roads, to avoid development which adversely affects the safe efficient and effective functioning of this network and these roads. Despite the Ministry being of the opinion that avoidance of effects is unnecessarily restrictive, avoidance of adverse effects of development is required by the CRPS.	Reject the relief sought by the Ministry of Education on this submission point.
Ministry of Education	S3.5	Reject.	The Section 32 report seeks to align the Ashburton District Plan with the proposed plans of neighbouring districts. Both Selwyn and Timaru proposed plans maintain a 70-student threshold for Basic Integrated Transport Assessments.	Reject the relief sought by the Ministry of Education on this submission point.
KiwiRail Holdings Ltd	S4.2	Support in part.	<p>The National Planning Standards do not have a definition for Transport Network. The definition used by Waimakariri DC in their proposed district plan is broader in definition and specifically includes critical, strategic, and significant infrastructure which are defined under the RPS and include rail networks.</p> <p>The Waimakariri PDP includes a definition for 'transport system' which "means all transport infrastructure, services and mechanisms that contribute to providing for all forms of transport including multi modal transport and active transport. It includes those parts of the transport system that form part of critical infrastructure, strategic infrastructure, regionally significant infrastructure, land transport infrastructure, and strategic transport networks."</p>	Amend.

The Fuel Companies	S5.1	Accept.	The inclusion of this policy supports Policy 5.3.8 of the CRPS to promote the use of transport modes which have low adverse effects.	Support the relief sought by the Fuel Companies on this submission point.
The Fuel Companies	S5.2	Reject.	The policy intent is to promote opportunity for safe and efficient travel. In the scope of high traffic generating activities, congestion can result in poor safety outcomes. Electric vehicles, whilst powered by more sustainable fuel sources, are still private motor vehicles and do not reduce congestion. Policy 5.3.8 of the CRPS directs the integration of land use and transport planning in a way that promotes the use of transport modes which have low adverse effects and the safe, efficient and effective use of transport infrastructure and reduces where appropriate the demand for transport.	Reject the relief sought by the Fuel Companies on this submission point.
The Fuel Companies	S5.3	Reject.	Policy 5.3.7 of the CRPS in relation to strategic land transport network and arterial roads, to avoid development which adversely affects the safe efficient and effective functioning of this network and these roads. Despite the Fuel Companies opinion that avoidance of effects is unrealistic, avoidance of adverse effects of development is required by the CRPS.	Reject the relief sought by the Fuel Companies on this submission point.
The Fuel Companies	S5.4	Accept.	Agree that it is unclear in the policy wording of what is proposed. The s32 report indicates the 'benefits of high trip generating developments' is the provision for accessibility by a range of transport modes. Therefore, I suggest amending the wording to Promote positive transport effects from <u>Promote positive transport effects from multi-modal transport options around high traffic generating activities.</u>	Amend.
The Fuel Companies	S5.5	Reject.	Reject changes proposed consistent with decisions sought by Council to Policy 10.3H and 10.4E	Reject the relief sought by the Fuel Companies on this submission point.

The Fuel Companies	S5.6	Reject.	<p>10.8.1 a) Additions, alterations and maintenance activities may increase vehicle movements. A change in use is not equivalent to an expansion of an existing activity nor is a change in use necessarily covered under a new land use activity, particularly if the activity falls within the same zoning in the district plan, for example, one commercial activity is replaced with another, similar yet different commercial activity with the potential to contribute to traffic differently.</p> <p>10.8.1 b), 10.8.1 c) The Anticipated Environmental Results are not solely focused on new or expanded activities and do in fact target the existing environment. Therefore, it makes sense that any activities that exceed the threshold (including existing activities) are not exempt from inclusion in these site standards.</p> <p>10.8.1 d) If an expansion of an existing activity is within the scope of the ITA and in accordance with the resource consent the rules do not apply. The wording of this clause is written in such a way that exempts sites within the scope of existing ITAs, not to exempt existing activities that have been established without an ITA.</p>	Reject the relief sought by the Fuel Companies on this submission point.
The Fuel Companies	S5.7	Accept.	<p>Generally, support the provision of Electric Vehicle Charging Stations. However, this should be provided in such a way that services existing carpark spaces to promote the transition to EVs rather than the provision of new carparking spaces. This provision supports the submission point at S5.1 to include a policy to enable charging stations to serve existing car parks. Amend to:</p> <p><u>The installation of a new, or replacement of existing, electric vehicle charging stations is a permitted activity, provided that the charging unit is installed immediately adjacent to an existing, permitted or consented vehicle parking space, and</u></p>	Amend.

			<p>does not exceed:</p> <ul style="list-style-type: none"> - 2.5m in height - 10m2 in footprint. 	
The Fuel Companies	S5.8	Neutral.	<p>Queuing Space Length requirements for less than 20 car parking spaces provided is consistent with neighbouring districts, Timaru and Selwyn, of between 5.5 and 6 metres. Whilst queuing spaces on entry to the site is not consistent with other approaches taken, this is at the discretion of the Council. The s32 report indicates it wishes to provide a consistent approach with neighbouring districts.</p>	<p>Neutral to the relief sought by the Fuel Companies on this submission point.</p>