

**SUBMISSION ON PROPOSED WAIMAKARIRI DISTRICT PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

To: Waimakariri District Council
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developmentplanning@wmk.govt.nz

Name of Submitter: R [REDACTED] Kimber

1. The specific provision of the Proposed District Plan that this submission relates to are as follows:

1.1 RLZ - Rural Lifestyle Zone

1.2 NH- Natural Hazards

2. The submission is that:

2.1 I am the part owner of 166 Jeffs Drain Road, Ohoka (Part Rural Section 5713 and Part Rural Section 6130) which is a 16.9351 hectare vacant rural property. The site, 166 Jeffs Drain Road, has been in the Kimber family for three generations. I grew up in the neighbouring property at 198 Jeffs Drain Road where the surrounding land was owned by my grandparents and then subsequently by my father. Recently 166 Jeffs Drain Road has obtained subdivision consent to divide it into four 10 acres lots in accordance with the current Rural zone provisions. This has enabled my sister and I to individually own a portion of the family farm, which was part of my father's succession planning. Attached is a copy of the approved Land Transfer Plan.

2.2 The property, 166 Jeffs Drain Road, is located on the northeastern side of Jeffs Drain Road, north of the intersection of Raddens Road. The site is an easy commute to the towns of Kaiapoi and Rangiora. The property is only 20km from Christchurch City. Broadly, the wider area predominately consists of rural lifestyle living with the occasional larger farming unit. The attached aerial photograph shows the number of rural lifestyle properties between Silverstream, Ohoka and Mandeville. To the north and west of the site are

multiple lifestyle properties of an approximate 4-hectare size average. There are also many lots smaller than 4 hectares in area including the adjacent property at 198 Jeff Drains Road and the four properties that share the northern boundary of the site.

- 2.3 I generally support the Proposed District Plan however I consider that amendments to the Proposed District Plan would better achieve sustainable management in terms of Part 2 of the Resource Management Act.
- 2.4 I support the proposed rezoning of 166 Jeffs Drain Road to Rural Lifestyle Zone (RLZ) as the existing activities being undertaken and subsequent nature and character of the surrounding area is consistent with the RLZ zone description in the National Planning Standards being *Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.*
- 2.5 I oppose the RLZ zone description in the Proposed District Plan. As guided by the National Planning standard I consider the purpose of the zone is not to provide for primary productive activities as proposed but rather to provide for predominant rural lifestyle use while enabling primary production.
- 2.6 The ability to provide for primary production is constrained on a 4-hectare site. This is highlighted in the MRB Rural Production Advice- Rural Land Zoning which supports the Proposed District Plan. This assessment states:
The Waimakariri District currently has a single rural land zone of 4 hectares. This has resulted in a large increase in lifestyle blocks since 2006 as Christchurch commuters were able to purchase lifestyle properties at comparable values to a house in town. Unfortunately, these properties replaced productive farmland and with a general lack of expertise and scale, production off these properties is generally sub-optimal. Also, a large proportion of the land area is used for domestic purposes including housing, sheds, horse grazing etc.
- 2.7 While a 4-hectare lot size has limited productive use it also is more than what is deemed necessary for a residential lifestyle within a rural environment. The MRB report also acknowledges that many lifestyle owners have limited agricultural knowledge with regards to simple crop husbandry, irrigation, grazing management, regulations etc. As small farm sizes increase, the standard of operator knowledge needs to increase or there is a need to employ

outside expertise. It is considered that a smaller lot size would better meet the demand/need for rural lifestyle living in the district.

- 2.8 A review of other Proposed District Plans being prepared under the National Planning Standard has found that the minimum lots size for the RLZ is often much less than 4 hectares proposed as illustrated in the table below:

District Plan	RLZ Minimum Lot Size
New Plymouth District Plan	<ul style="list-style-type: none"> • no more than four proposed allotments being created have a lot size of less than 1 ha in area; and • every allotment has a minimum lot size of 4,000m²; and • for each allotment that has a lot size between 4,000m² and 1 ha in area, a corresponding allotment of over 1 ha in area is provided;
Manawatu District Plan	Minimum Site Size – 5000m ² Maximum Site Size – 1 hectare
Queenstown Lakes District Plan	One hectare providing the average lot size is not less than 2 hectares.
Thames Coromandel District Plan	2 hectares minimum net lot area.

- 2.9 For the above reasons I oppose the reference to a minimum lot size of 4 hectares in the RLZ policies, rules and standards and consider a minimum lot size of 1 hectare to be appropriate for those areas zoned RLZ.
- 2.10 I generally support the natural hazard chapter however I have some concerns regarding the Flood Assessment Certificate potentially being inaccurate. Is the Flood Assessment based on LIDAR data or ground survey? For accuracy it is recommended that ground survey is utilised. Would Council's Flood Assessment Certificate be peer reviewed and how can the findings in the Flood Assessment be challenged?

3. I seek the following decision from the Council:

- 3.1 The RLZ zone is retained for 166 Jeffs Drain Road, Ohoka and the subsequent parcels created by LT Plan 564981.

AND

- 3.2 The RLZ zone description and subsequent objectives and policies is amended to recognise the predominant use for rural lifestyle living activities and to ensure that the role, function and predominant character and amenity of the zone is not compromised by incompatible activities.

AND

- 3.3 Reduce the minimum lot size within the RLZ to 1 hectare.

AND

- 3.4 Ensure the Flood Assessment Certificate is as accurate as practically possible.

AND/OR

- 3.5 Any such further or other relief as may be necessary to address the issues or concerns outlined above.

4. The submitter does wish to be heard in support of this submission

5. If others make a similar submission the submitter would be prepared to consider presenting joint case with them at any hearing.

Email: robertkimber@gmail.com

Aerial Photograph



Source: <https://waimakariri.isoplan.co.nz/draft/#/Property/10005>