



Submission on Proposed Waimakariri District Plan Variation 1

J■■■ and C■■■ Broughton

September 2022

Waimakariri District Council

RESOURCE MANAGEMENT ACT 1991

WAIMAKARIRI DISTRICT COUNCIL

SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN VARIATION 1

Submitter Details

Name: J■■■ and C■■■ Broughton

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Trade Competition:

Ability to gain a trade competition advantage through this submission - No

Hearing Options:

We do wish to be heard in support of our submission. If others are making a similar submission, we may consider presenting a joint case with them at the hearing.

Specific Provisions to Which this Submission Relates:

All the Proposed Waimakariri District Plan (PWDP) Variation 1, including but not limited to:

District Planning Maps.

General District Wide Matters – Strategic Directions

Area Specific Matters – New Development Areas – West Rangiora Development Area.

Note: this submission should be read in conjunction with the submission lodged on behalf of J■■■ and C■■■ Broughton (hereafter referred to as ‘the Broughtons’) made a submission on the notified Proposed Waimakariri District Plan (PWDP). Except where this submission provides an

update to the relief sought, this submission should be read alongside and subject to that earlier submission.



Figure 1: Site subject to the submission

Decision we wish the Council to make:

Preferred Relief:

1. Amend Proposed Waimakariri District Plan (PWDP) Planning Maps by rezoning the following land from Rural Lifestyle Zone (**RLZ**) to Medium Density Residential Zone (**MDRZ**). The landownership and cadastral information directly affected by this submission is shown in **Table 1** below.

Registered Owner	Address	Appellation Title	Area (ha)
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John and Coral Broughton	113 Townsend Road	Lot 2 DP 495345	4.0389
John and Coral Broughton	117 Townsend Road	Lot 3 DP 495345	4.4546
			8.4935 ha

Table 1. Legal descriptions and ownership of land parcels for which MDR rezoning is sought.

2. Delete or in the alternative amend the PWDP subdivision certification provisions including so that it is a fair, equitable, transparent, appealable, efficient and fast process for delivering land for housing and does not duplicate matters that can be dealt with at subdivision stage; and to address any other concerns with certification which arise on further investigation.
3. Amend the PWDP provisions (additions in bold and underlined, and deletions as strike out) as below, and in addition delete or amend the PWDP certification provisions to give effect to the relief outlined in 2. above. This includes by amending the West Rangiora Development Area provisions to removal all references to the certification process, and instead rezoning the land the subject of this submission to MDRZ.
4. Amend the West Rangiora Outline Development Plan (ODP) to identify all residential areas as Medium Residential Density; and to give effect to the other changes to the ODP sought in the Broughton submission on the PWDP as set out below; and amendments to the West Rangiora ODP narrative and other provisions to be consistent with these amendments.

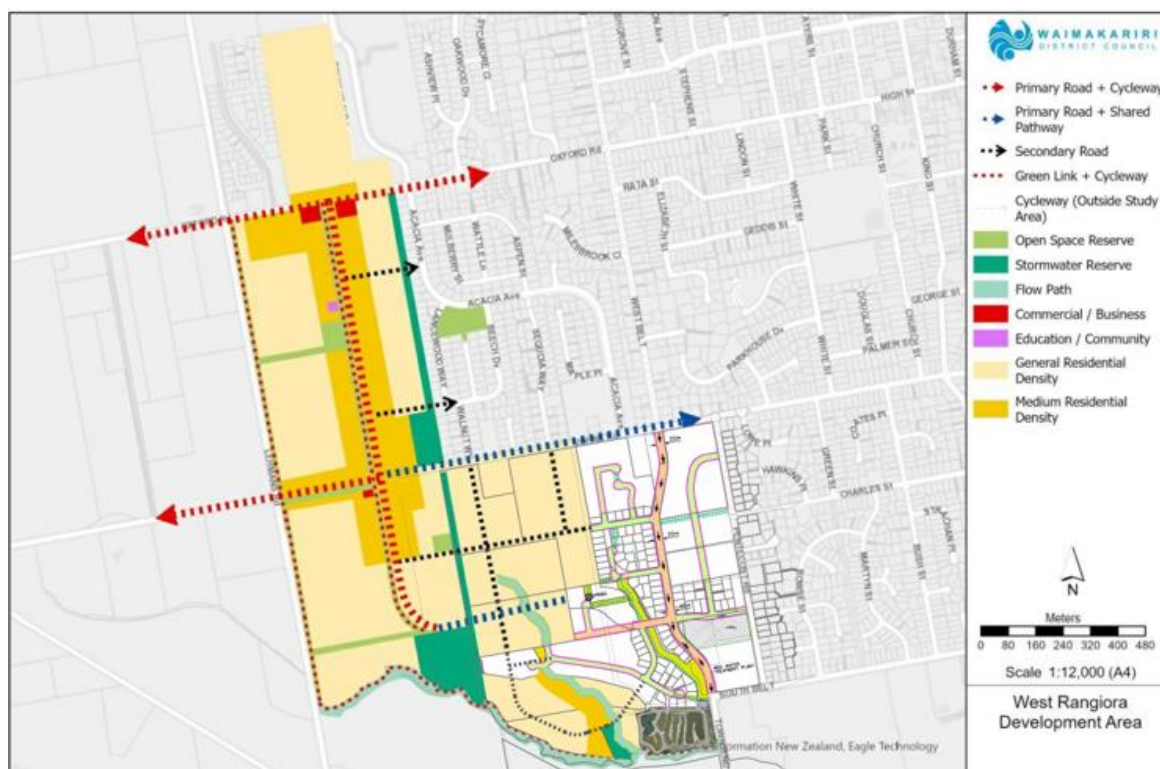


Figure 2: Amendments to West Rangiora ODP sought in Broughton submission PWDP. These amendments are sought in the Variation 1 submission, except that all residential areas should be identified as Medium Density Residential.

5. Any consequential, further or alternative amendments to the PWDP to be consistent with and give effect to the intent of this submission, and the interests of the Submitter.

Part 2 – District Wide Matters.

Strategic Directions

SD-03

Urban development and infrastructure that:...

6. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to **as a minimum** achieve the housing bottom lines in UFD-O1.

Reasons for the Submission

4. The reasons for our submission are, in summary because

- a) The preferred relief including the proposed rezoning is both appropriate and necessary to achieve sustainable growth and development of Rangiora and to meet the requirements of the National Policy Statement for Urban Development 2020 (NPS-UD). It is consistent with and gives effects to the Resource Management Act 1991, including Part 2 and Section 32 and the Resource Management Enabling Housing (and other matters) Amendment Act 2021.
- b) The Site identified in Figure 1 is a logical and preferred location for further urban growth of Rangiora. It adjoins existing urban development to the north east (known as Townsend Fields) and the West Rangiora Development Area land proposed to be rezoned MDRZ under Variation 1 (to the north). It has been identified in the Proposed Waimakariri District Plan (PWDP) as part of the West Rangiora Development Area and recognized as a Future Development Area (FDA) in the Canterbury Regional Policy Statement (CPRS).
- c) The FDAs for Rangiora on Map A of the CRPS need to be rezoned now to give effect to the NPS-UD 2020.
- d) At present rates of land uptake there is about 4 years vacant land supply in Rangiora. Given it takes 3-5 years to bring land from zoned state to on the market as developed lots, there is urgency in providing additional capacity. Increased intensification opportunities resulting from MDRZ are anticipated to result in an additional 269 dwellings in Waimakariri in the next five to eight years.¹ In comparison, the Variation Section 32 estimate that 13 500 additional dwellings will be required for the period up to 2051. This proposal helps address an anticipated shortfall in residential zoned plan enabled land.
- e) The proposed rezoning will accommodate approximately 127+ lots (based on a yield of 15 hh/ha), which will contribute towards meeting the housing needs of Rangiora.
- f) Rezoning of the Site for residential purposes will give effect to Policy 12 in the CRPS.
- g) Variation 1 only proposes to rezone 86ha of FDA land (at south west Rangiora and north east Rangiora), with an anticipated yield of around 1000 households and in the ownership of just two major local developers. This favours these existing developers and is inconsistent with the direction of the NPS-UD which, among other things, promotes a competitive land market. It is also inadequate to meet Rangiora housing needs in both the short and medium term.

¹ Section 32 page 46.

- h) The rezoning will help achieve a compact, and efficient, urban form with connectivity with multiple transport modes and will contribute to a well functioning urban environment.
- i) Adverse effects on the environment arising from the proposed rezoning will be minimal, if any, and can be adequately mitigated.
- j) The proposed rezoning is consistent with the PWDP objectives and policies, relating to Strategic Directions Urban Form and Development and Urban Growth, including as sought to be amended by the Broughton submissions on the PWDP and Variation 1.
- k) The alternatives of retaining General Rural or Large Lot Residential zones across the entire Site are not an efficient use of land and does not give effect to Change 1 of the CRPS.
- l) The proposed subdivision certification process is opposed for the reasons outlined in the Broughton submission on the notified PWDP.
- m) With respect to the amendments sought in the Broughton submission on the notified PWDP, for all the reasons outlined in that submission.
- n) The proposed rezoning and other amendments sought are consistent with and the most appropriate, efficient, and effective means of achieving the purpose of the RMA.

CONCLUSION

- 49. There is no resource management reason as to why the Site cannot be zoned for residential development immediately. The Council, through its planning has removed most of the statutory barriers to bringing the land to the market and leaving it rural is not an efficient, nor appropriate use of the Site given the high demand and high land prices in Rangiora and other parts of the District. It is understood that vacant standard residential section prices in Rangiora have, similar to Rolleston, approximately doubled in price in the last 6-18 months.
- 50. The proposal is in accordance with and supports the growth direction for Rangiora set down in the Canterbury Regional Policy Statement and Proposed Waimakariri District Plan; It promotes the social economic and cultural well-being of current and future residents of Rangiora by adding to land supply. It gives effect to Change 1 of the CRPS and the National Policy Statement on Urban Development 2020 (NPS-UD) and is in accordance with, and supports, the objectives and policies of the other relevant planning documents. The proposed rezoning is the most appropriate planning outcome for the using the land in a

manner the promotes the purpose and principles of the RMA; and supports the Council in carrying out its functions under Section 31 of the Act.

51. The proposed certification process for delivering land for housing within the New Development Areas including at West Rangiora is opposed. In circumstances where there is an acute housing need and rapidly escalating house and land prices fueled in part by a shortage of supply, the Council needs to act quickly and with certainty to address the shortfall. Whilst innovation is important, this is not the time to be testing a new uncertain and unproven method for delivering land for housing. A much quicker and more certain method for the Council to rezone the land in the New Development Areas, including the Site.
52. The mandatory requirement of the NPS-UD is that every tier 1 local authority must provide at least sufficient development capacity to meet expected demand for housing. Development capacity for the medium term must be zoned in a proposed plan and be infrastructure ready². The Council has not choice – it must rezone the Site MDRZ in Variation 1 to the PWDP.



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(Signature of applicant or person authorized to sign on behalf of the submitter)

Date: September 9, 2022

² NPS-UD clauses 3.2 and 3.4