

Before the Independent Hearings Panel appointed by the Waimakariri District Council

Under: The Resource Management Act

In the matter of: Private Plan Change RCP31 to the Operative District Plan

And: Rolleston Industrial Developments Limited

Niki Mealings- SUBMISSION 638 ON PRIVATE PLAN CHANGE RCP31

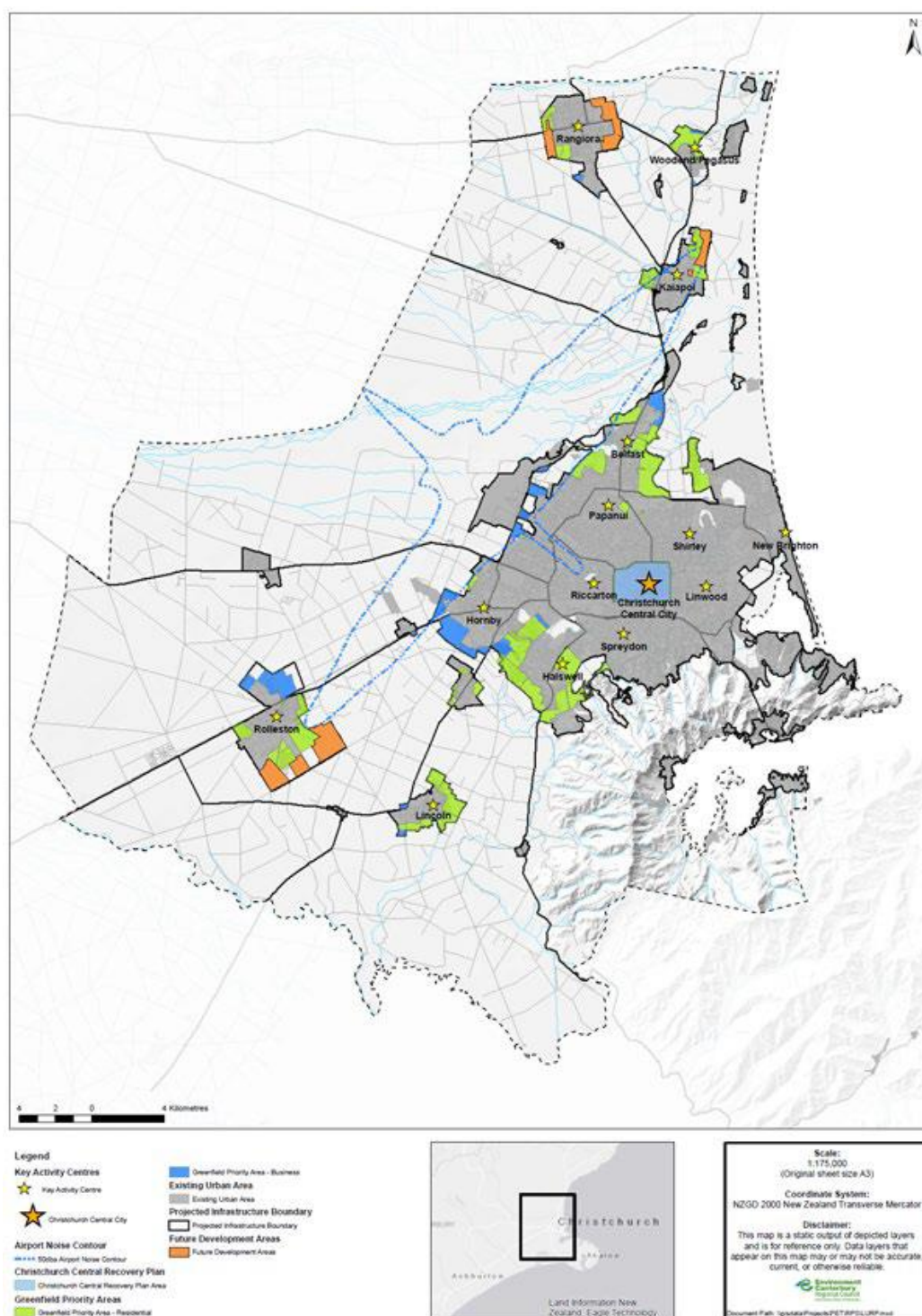
**Introduction**

- 1) I have been an Ohoka resident for over 24 years residing approximately 400m from the plan change area. Although this submission is put forward in my personal capacity as an affected party and in advocacy for my community, I would also like to disclose that I am a second term Waimakariri District councillor for the Oxford-Ohoka Ward and a member of the Oxford-Ohoka Community Board. For both terms I have held the Climate Change and Sustainability portfolio and have sat on the Greater Christchurch Partnership. I have been a member of the Ohoka Rural Drainage Advisory Group for 4 years and was a member of the executive committee of the Ohoka Residents Association for 7 years. Furthermore, my husband is the 4<sup>th</sup> generation of his family born and raised in Kaiapoi, the downstream receiving environment of this proposal. To be clear, I am not holding myself out as an expert, but as one with long-term close ties with Ohoka and its surroundings and who is well-informed of the issues that concern it.
- 2) I wish to record my opposition to PC31 for the reasons laid out in my original submission and further detailed in my evidence and seek for it to be declined in its entirety.

**NPS-UD**

- 3) Whilst I will leave it to the experts to delineate their points more completely, I disagree that intensified development of Ohoka is justified by the NPS-UD as laid out in my original submission. I concur with the positions stated by Mr. Schulte in his submission on behalf of the Waimakariri District Council.
- 4) Policy 8 of the NPS-UD states that *"Local authority decisions affecting urban environments should be responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: unanticipated by RMA planning documents; or out-of-sequence with planned land release."*
- 5) This plan change application is not just out of sequence with *planned* land release; land release in Ohoka is not planned *for*. Similarly, it is not simply unanticipated, Ohoka does not appear on Map A in C:6, p. 92 of the CRPS as a Greenfield Priority Area or Future Development Area because it has been consciously and comprehensively ruled out by numerous prior planning processes and consultation over many years. Such a development in the proposed location does not contribute to a well-functioning urban environment as it is in a rural area totally disconnected from the district's urban areas, hence the reason it is unanticipated.

6) **Map A - Greenfield Priority Areas and Future Development Areas** (viewable in more detail at [www.ecan.govt.nz](http://www.ecan.govt.nz))



As regards NPD-UD Objective 3 it states, “Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities; the area is well-served by existing or planned public transport; there is high demand for housing or for business land in the area, relative to other areas within the urban environment.” Ohoka does not fulfil any of these criteria.

- 8) I note that in the evidence of Mr. Jones that he says there is *“considerably higher demand for housing in Ohoka relative to other surrounding areas such as Kaiapoi, Swannanoa, Fernside and Rangiora”*, and he refers to Ohoka as being *“the most popular lifestyle and residential location by far”*.
- 9) Whilst I do not doubt Mr’ Jones’ credentials as an accomplished real estate agent, a quick look at his business website at [www.chrisjonesbayleys.nz](http://www.chrisjonesbayleys.nz) reveals that Mr. Jones deals primarily with real estate on the south-western side of Christchurch and in Selwyn, with very limited activity in the eastern Waimakariri District and none in Ohoka or its surrounds. I have never seen a property advertised by him in Ohoka, and no other resident in the area has ever heard of him, thus I do not believe him qualified on the matter of demand in Ohoka or the greater Waimakariri District.
- 10) Mr. Carter states in para 17 of his evidence that *“Although we have in no way marketed any of the sections for the development, since lodging the application, we have had a huge number of direct enquiries from both builders and individuals who are highly interested to buy sections in our development.”*
- 11) Giving Mr. Carter the benefit of the doubt that perhaps he was unaware of it, there has been a website, [www.ohokaestate.co.nz](http://www.ohokaestate.co.nz) promoting the proposed development from at least early August 2022 as an attempt was made to promote it at that time in the local community social media pages. This may have induced some of the demand referred to. I referenced this website in my original submission lodged on 5 August 2022.
- 12) NPS-UD Objective 8 that *“New Zealand’s urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change”*. This too, fails to meet the mark. I agree with Mr. Willis in his memo to Mr. Buckley regarding the Assessment of GHG Emissions from the proposed subdivision, particularly his comparison of GHG emissions of the current farming activity vs. the proposed development.
- 13) Further, although the wording has been recently changed somewhat, the Applicant stated on the aforementioned website at the time of my submission that ‘Ohoka Estate’ is *“an easy drive into Christchurch”*. It now reads *“just ten minutes from nearby Rangiora and Kaiapoi, and with the new Northern Corridor motorway, it’s only 20 minutes from the Christchurch CBD.”* They appear to be very much aware and accepting that any future residents of this would-be development would be commuting via private motor vehicles as their main mode of transport.
- 14) In line with New Zealand’s emission reduction goals, Waka Kotahi’s Emissions Reduction Plan actively seeks to reduce VKT (vehicle kilometres travelled) by 20% by 2035 irrespective of changes in economic and population growth. PC31 is also contrary to this goal.
- 15) Whilst I will leave the finer points of discussion to the expert witnesses, I believe development at this scale in Ohoka would represent a perverse outcome and unintended consequence of the

NPS-UD. I contend that reliance on the NPS-UD as justification for this application is contrary to the spirit and intent of the policy statement.

### **Other reasons for objection**

- 16) I accept that the proposed development is not captured by the National Policy Statement – Highly Productive Land (NPS-HPL), however, the productive capacity of the subject land should still be considered. It has been a highly productive farm, growing all its feed requirements on site, as well as supporting dairying and high value genetics breeding operation for many years. Other historic land uses included growing of lucerne, clover, hay, wheat, barley, oats, linen flax, and potatoes as referenced in the book '*Survey of Ohoka School District*' written by Std 2 to Form 2 Students in 1943.
- 17) PC31 is not consistent with Objective 14.1.1, Policy 14.1.1.1, Policy 18.1.1.3, and especially Policy 18.1.1.9 of the Operative District Plan. Its understanding is also inconsistent with the attributes of Residential Zone Characteristics in table 17.1 of the Operative District Plan.
- 18) Ohoka has also been rejected as an area for more intensive urban development in previous district development strategies, such as the Rural Residential Strategy 2019, and in the development work for the District Plan Review currently underway.
- 19) The impacts of intensification on 3 waters infrastructure: water supply, wastewater and stormwater, remain insufficiently understood, with an unacceptable potential for adverse effects at Ohoka and further downstream given remaining uncertainties around the proposed solutions and how infrastructure will be integrated.
- 20) I and my community are concerned that the flooding events that occurred in 2014, 2017, 2021, 2022, and now 2023 have not been taken fully into account. These events are now occurring more frequently and with greater intensity as a result of climate change. In spite of drainage infrastructure improvements and diligent management by council staff before and during rain events, local drains already reach peak capacity during high rainfall events. Adding more surface water from impervious surfaces if PC31 was approved would push local drainage beyond capacity. The impacts on drainage leading to flooding at Ohoka and further downstream are concerning. This area is low-lying, slow-draining and is increasingly flood prone with a high water table that makes conventional solutions unworkable.
- 21) The most recent rain event which has been broadly discussed in these proceedings only registered 105mm of rain around the plan change area, which correlates to a 15 year return period, or a 6.7% aep, with the critical duration period of 24 hours registering 91.4mm. This doesn't even register as an event a developer would be required to design for, yet the drains were overflowing the roads and flooding people's properties. It is my understanding that council modelling does not take groundwater levels into account, nor already saturated catchments. This causes concern for the accuracy of modelled projections and the fitness of proposed solutions.
- 22) The transport and traffic impacts have not been satisfactorily assessed, especially from a wider area, district and regional perspective. The effects of intensification on already marginal rural

roads, and the potential costs to upgrade the local, and wider, traffic network has not been adequately assessed or understood.

- 23) The adverse landscape and visual effects on Ohoka have been unduly minimised, in an assessment that is considered inadequate.
- 24) There is a potential for increased reverse sensitivity effects given the increase in intensity and the number of potentially sensitive receptors. The floodgates argument of allowing such intense development will also ultimately decrease housing choice for those wanting rural or rural residential living by diminishing those options in siting urban scale residential dwelling intensity in Ohoka.
- 25) In conclusion, I believe that a development of the size and scale proposed is inappropriate for a small settlement like Ohoka. There is a lot of discussion by experts about the *feasibility* of infrastructure to service the proposed development, but very little discussion of the *actual cost* of providing it in comparison with locations with already existing infrastructure and services, which will ultimately be borne by the ratepayer at the expense of investment in better suited areas. As such, I do not regard this proposal as an efficient use of resources and ask for it to be declined.

Thank you for your time in hearing my submission.