

RESOURCE MANAGEMENT ACT REGULATIONS FORM 6

Further submission in support of, or in opposition to, a submission on the notified Proposed Waimakariri District Plan Clause 8 of the First Schedule, Resource Management Act.

To: Waimakariri District Council,

By email only: developmentplanning@wmk.govt.nz

Further Submitter Details

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Contact Person Fiona Aston

I/we made a submission on the Proposed Waimakariri District Plan – My submitter ID number is:
183

I am a person who has an interest in the proposal that is greater than the interest the general public has as I am directly affected by the content of a submission. There are potential effects on my property and its development arising from the submission.

Submission details – see attached table.

Hearing options

Do you wish to be heard in support of your submission?

Yes

If others are making a similar submission, would you consider presenting a joint case with them at the hearing?

Yes



Fiona Aston, Principal Aston Consultants Ltd

.....

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

Date: 21/11/2022

FURTHER SUBMISSION ON NOTIFIED PROPOSED WAIMAKARIRI DISTRICT PLAN

R&G SPARK ID 183

This submission is in relation to the submission of: (name & number)	The submission point I/we support of oppose is	I/we oppose in part or full/support in part of full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
316 Environment Canterbury	The submission in its entirety, including but not limited to SD -UFD (Strategic Directions – Urban Form & Development), UG (Urban Growth) and SUB (Subdivision); including but not limited to the submission points set out below.	Oppose in part	The amendments sought are not realistic, achievable, necessary, or appropriate, and are inconsistent with the RMA and national policy direction, including the NPS-UD. The submitter wishes to be a party to the notified provisions sought to be retained by ECAN, as these may impact on the consenting framework for the rezoning and other Proposed Waimakariri District Plan (PDP) amendments sought by R&G Spark.	Reject submission to the extent that it is inconsistent with the relief sought by R&G Spark, the intent of their submission and their interests.
316 Environment Canterbury	316.3 SD-04 Amend SD-04 to more explicitly provide for the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land	Oppose	Any amended wording needs to reflect the NPS-Highly Productive Land but also recognise the circumstances under which urban zoning of HPL is appropriate.	Retain SD-04 as notified

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316.8	UFD P2 Amend policy to give effect to Chapter 6 in the CRPS	Oppose	The Waimakariri District Olan (WDP) must also give effect to the National Policy statement on Urban Development (NPS-UD). There are likely to be areas not yet identified that are suitable for urban development but are outside of the areas currently identified on Map A	Retain UFD P2 as notified
316.9	UFD P3 Amend policy to provide for rural residential development in the part of Waimakariri District that is within the Greater Christchurch area only where it has been identified in an adopted Rural Residential Development Strategy and is in accordance with Policy 6.3.9.	Oppose	The density of LLR should not be bound by Policy 6.3.9 of the CRPS. That Policy, and consequential rural residential strategies in district plans, are no longer appropriate in terms of emerging growth patterns in Greater Christchurch, and the NPD UD 2020.	Retain UFD P3 as notified.
316.15	To give effect to Policy 5.3.12 of the Canterbury Regional Policy Statement (CRPS), urban development outside of the identified new development areas should be avoided where highly productive soils are present.	Oppose	The relief sought is contrary to the RMA and NPS-HPL which specifies circumstances where use of HPL for urban development is appropriate.	Reject submission
316.187	Amend certification process to include: - All natural hazards in Future Development Areas are assessed and it is demonstrated that risks can be avoided or mitigated before land is released for development. This includes not increasing	Oppose	Not necessary. Duplicates other RMA processes for assessing these matters.	Reject submission.

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	<p>risk to surrounding land through mitigation techniques. Deferring effective consideration to the subdivision stage is inadequate.</p> <p>- Identification and protection of indigenous biodiversity, especially wetlands, given the policy positioning in the National Policy Statement on Freshwater Management and the rules in the National Environmental Standards for Freshwater</p>			
295 Horticulture NZ	<p>295.70</p> <p>Amend SD-O2:</p> <p>"...</p> <p>11. that avoids versatile soils and avoids creating incompatible activities on rural zone boundaries."</p>	Oppose	Contrary to RMA and NPS-UD, and and NPS-HPL which sets out circumstances under which HPL can be rezoned for urban development; and appropriate use and development of HPL, including where subject to longterm or permanent constraints to production.	Reject submission
295 Horticulture NZ	<p>295.74, 295,205-212</p> <p>UFD, P1-P8, P9 – amend to ensure the life supporting capacity of soils are safeguarded. No wording given.</p>	Oppose	Contrary to RMA, NPS-HPL and NPS-UD (depending on wording of amendments sought – none given)	Reject submission
295 Horticulture NZ	<p>UFD P10 2. minimise avoid reverse sensitivity effects on primary production from activities within new development areas. Where avoidance</p>	Oppose	Avoidance carries a very strong directive	Retain UFD P10 as notified.

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	compromises through setbacks and screening, without compromising the efficient delivery of new development areas., <u>then impacts are mitigated through development design, setbacks, and screening.</u>			
295 Horticulture NZ	295.99 SUB - Wawahia whenua - Subdivision Insert new policy SUB-PX: "Within the Rural Zones and in urban areas with an interface with a rural zone ensure that subdivision does not compromise the use of highly productive land and versatile land for rural production."	Oppose	Proposed wording of new policy inconsistent with RMA, NPS-HPL and NPS-UD. Not all HPL as defined in the NPS-HPL is capable of being used for productive farming purposes.	Reject submission
414 Federated Farmers	SD-04 Amend SD-04: "... 1. providing for rural production activities, activities that directly support rural	Oppose	Inconsistent with RMA, NPS-HPL and NPS-UD. Not all HPL as defined in the NPS-HPL is capable of being used for productive farming purposes	Reject submission

This submission is in relation to the submission of: (name & number)	The submission point I/we support of oppose is	I/we oppose in part or full/support in part of full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	<p>production activities and activities reliant on the natural resources of Rural Zones</p> <p>and limit other activities;</p> <p>2. limit other activities;</p> <p>3. ensuring that within rural areas the establishment and operation of rural</p> <p>production activities are not limited by new incompatible sensitive activities; and</p> <p>4. protecting LUC 1 – 3 class land and other identified versatile soils from subdivision and development in order to maintain the life-supporting capacity of soil."</p>			
<p>414</p> <p>Federated Farmers</p>	<p>414.58-66</p> <p>UFD P 1-9</p> <p>Add to policies additional wording:</p> <p>"Avoid where practicable any development on LUC 1-3 soils."</p>	<p>Oppose</p>	<p>Inconsistent with RMA, NPS-HPL and NPS-UD. Proposed wording is vague and uncertain.</p>	<p>Reject submission</p>

This submission is in relation to the submission of: (name & number)	The submission point I/we support of oppose is	I/we oppose in part or full/support in part of full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
414 Federated Farmers	414,67 UFD P10 Reword "3. Minimise reverse sensitivity effects on primary production, including LUC 1-3 soils."	Support in part	Proposed wording is more flexible in terms of implementation options. Words 'including LUC1-3 soils' unnecessary.	Proposed wording is more flexible in terms of implementation options. Words 'including LUC1-3 soils' unnecessary.
414 Federated Farmers	414.206 SUB O1 Amend SUB-O1(3): "3. supports protection of cultural and heritage values, high class soils and conservation values, and"	Oppose	Not appropriate. This Objective is about subdivision design – headed SUB-O1 Subdivision design	Reject submission
169 NZ Pork	169.12 Amend UFD-P2 Identification/location of new Residential Development Areas, to include criteria for considering effects on primary production and highly productive land	Oppose	Not necessary or appropriate	Reject submission
325 Kainga Ora	The submission in its entirety, in particular but not limited to parts relating to SD, UFD, SUB, UG, RESZ, GRZ, LLRZ, CMUZ, NCZ, LCZ, Rezoning	Oppose in part.	Opposed to extent inconsistent with our interests and the relief sought and intent of the R&G Spark submission on the PDP. The submitter wishes to	Reject submission where inconsistent with, or has

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	Maps, NEW, including but not limited to the specific points below.		be a party to the notified provisions sought to be retained by Kainga Ora, as these may impact on the consenting framework for the rezoning and other Proposed Waimakariri District Plan (PWDP) amendments sought by R&G Spark	implications for the relief sought by R&G Spark, the intent of their submission and their interests.
325.3 Kainga Ora	Amend SD-O2: "Urban development and infrastructure that:.... 4. provides a range <u>and mix of</u> housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve <u>at all times at least</u> the housing bottom lines in UFD-O1; ...	Support in part (clause 4)	Consistent with NPS-UD	Accept submission re SD-02.4
325.27 Kainga Ora	Amend UFD-O1: " There is, at all times, at least S sufficient feasible development capacity for residential activity to meet specified housing bottom lines..."	Support	Consistent with NPS-UD	Accept submission
360	The submission in its entirety, in relation to matter raised under the submission headings 'Provision for urban activities in Development	Oppose	Inconsistent with RMA, NPS-UD and NPS-HPL. The submitter wishes to be a party to the notified provisions sought to be retained by Christchurch	Reject submission to the extent that it is inconsistent with

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Christchurch City Council	Areas in accordance with the RPS Greenfield Priority Areas'; 'Alignment with Greater Christchurch partners'; 'Use of highly productive land for urban, rural lifestyle and other activities', including but not limited to the submission points below		City Council, as these may impact on the consenting framework for the rezoning and other Proposed Waimakariri District Plan (PWDP) amendments sought by R&GSpark	the relief sought by R&G Spark, the intent of their submission and their interests.
360.9 Christchurch City Council	Policy UFD-P2. The Council opposes this policy as it potentially allows for new residential development outside of the identified Development Areas 'as-of-right'. Such development could not only be contrary to the FDS and the CRPS urban growth direction but also be inconsistent with the strategic direction in the proposed Plan's Objective SD-02	Oppose	The City Council has misinterpreted the manner by which the NPS-UD 2020 applies to District Plan Reviews ie the responsive provisions are not confined to Policy 8.	Retain UFD P2 as notified
212.1 CSI Properties	Submission requesting rezoning of 149 Boys Road, 197 Boys Road, 243 Boys Road, 4 Marsh Road, 137 Marsh Road, 150 Marsh Road, 228 Marsh Road, 287 Boys Road, 2 Dunlops Road, 10 Dunlops Road, 24 Dunlops Road, 28 Dunlops Road, 32 Dunlops Road, 34 Dunlops Road, 17 Gerkins Road, 21 Gerkins Road, 109 Camside Road, and part of 65 Northbrook Road	Support in part	<p>The submission is similar and appears to overlap with my submission (Submitter 183) but includes substantial areas of additional land to the east, and some additional land to the west.</p> <p>The rezoning of that part of the land which is covered by submission 183 (and any amendments to land I seek to be rezoned, including but not limited to taking into account possible amendments to the alignment of the</p>	Accept the request to the extent it supports the relief sought in the submission by R&G Spark, the intent of that submission and their interests, and as per the

This submission is in relation to the submission of: (name & number)	The submission point I/we support of oppose is	I/we oppose in part or full/support in part of full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
			<p>proposed Rangiora Bypass which crosses my land) is supported in principle. If the Council is minded to consider rezoning any land additional to this then as a minimum the submitter needs to:</p> <ol style="list-style-type: none"> 1) provide a robust assessment of the effects of the additional rezoning sought, including on the surrounding area and my land; 2) address how the additional rezoning will be integrated with my land, including but not limited to an integrated approach to services and infrastructure; 3) provide a planning assessment which establishes that the additional rezoning is consistent with the direction of the NPS-UD and the RMA 	<p>'relief' specified under 'Reasons for my support/opposition'; and any re-zoning of land outside the land the subject of submission includes appropriate connectivity and other Outline Development Plan and other PDP provisions to our satisfaction.</p>
<p>408 Mark Allan, Aurecon</p>	<p>The submission in its entirety including as it relates to SD, UFD, Planning Maps, TRAN, SUB, HH, SASM, NATC, RESZ, GRZ, MRZ, CMUZ, LCZ, SER – South East Rangiora, WDC – Designation WD-47 (Rangiora East Road Connection)</p>	<p>Support in part</p>	<p>This submission relates to PDP provisions that affect rezoning, subdivision and development of land at East Rangiora, including the land the subject of R&G Spark submission and neighbouring land. These include amendments to the South East Rangiora Outline Development</p>	<p>Accept to the extent it supports the relief sought in the submission by R&G Spark, the intent of that</p>

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			Plan which have potential implications for the development of the Spark land (including to roading, infrastructure, open space and green links, cycleways, and stormwater and open space features). No reasons are given for the changes, or justification or assessment of the effects of the same.	submission and their interests. Any changes to the South East Rangiora Development Area provisions, including the SE Rangiora Development Plan which we consider are not appropriate or supportive of rezoning and development of the Spark land are opposed. Any changes are to be to our satisfaction.
413.2 Chris Fowler, Saunders & Co	413.2 Seeks to rezone Bellgrove South and Bellgrove North from proposed Rural Lifestyle Zone	Support in part	The submitter's land is north of the R&G Spark land.	Accept to the extent it supports the relief sought in the submission by R&G Spark, the

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	<p>to:</p> <p>(a) a mix of Residential General Density Zone and Residential Medium Density Zone generally as shown on the North East Rangiora Outline Development Plan (ODP) and the South East Rangiora ODP; or</p> <p>(b) to Residential Zone, as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b; and</p> <p>(c) Commercial / Business Zone as detailed in the first submission [408] on attachment 3a and 3b, and attachment 4a and 4b.</p>			<p>intent of that submission and their interests; and any re-zoning of land neighbouring the Spark land includes appropriate connectivity and other Outline Development Plan and other PDP provisions to our satisfaction.</p>