

## Hearing of Submission 102.1 – 666 Mt Thomas Road – MJ Borcoskie Family Trust

Thank you for the opportunity to speak to this submission. My family have owned this property for 45 years, we have seen the district and our area change from a farming community to predominantly lifestyle block ownership of 4ha with new housing built. Residents of the area now walk their dogs on leashes, run and cycle the roads, and landscape their properties. The area has changed from a land based primary production settlement with “the prominent character of an open, large-scale productive landscape with open grassland, pastoral farming, cropland and small areas of forestry,” to a Residential Lifestyle community.

We therefore seek that that this area be zoned in accordance with its current characteristics.

I take it you have read the evidence or supporting document I have supplied. I wish to highlight the key takeaways from this.

- 1) 666 Mt Thomas Road is more akin to RLZ land because of its size and the surrounding smaller parcels of land which represent the type of land described as RLZ in the proposed plan.
- 2) Fragmentation of this area has already occurred in the past 20 years with the subdivision of 4ha blocks reducing land based primary production. Many 4ha blocks of land are unproductive. Therefore, I believe that this land is not highly productive or of a large and geographically cohesive area as described in the NPS-HPL.
- 3) The soils of the land of 666 Mt Thomas Road are not of a type to justify the GRUZ designation and would be better reflected as RLZ land. I believe ECan is classifying the land as LUC3 under the NPS-HPL however they are **Rangitata**, essentially very stony sand with low nutrients, and not Highly Productive. The soil type is more marginal than other land in LUC3.
- 4) Due to the lands size, physical attributes including low-quality sandy soil and boundary of a public reserve and surrounding smaller blocks with potential reverse sensitivity issues, permanent or long-term constraints mean that the use of this property for land-based primary production is **not able to be economically viable**, and these constraints cannot be addressed through any reasonably practicable options that would retain the HPL's productive capacity.

If this property **is** to be zoned GRUZ:

- 1) The GRUZ activity rules should not require consents, as it is a contradiction to redefine the GRUZ and then require resource consents for intensive indoor and outdoor farming activities. The proposed rules are not consistent for a rural zone because many sites within the GRUZ are in substance RLZ land. There is no benefit whatsoever to the GRUZ in the proposal when the activity rules are essentially the same as RLZ. This being said, the zoning should be made on a case by case basis.

- 2) The GRUZ must have Council rates calculated based on largescale farmland not 4ha block rating. Potentially the WDC will impose rates within the GRUZ which includes smaller residential blocks to the detriment of the farmers whom operate in GRUZ.
- 3) The NPS-HPL Policy 4 states, “The use of highly productive land for land-based primary production is prioritised and supported.” With this in mind the needs of primary producers in the GRUZ should be prioritised over smaller land holders who are more akin with the RLZ.
- 4) The NPS-HPL Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land. Currently with, in effect 4ha RLZ blocks surrounding larger blocks of land reverse sensitivity issues are already occurring with rubbish from small block owners entering farmland and killing stock. ie plastic bags entering farmland and being eaten by livestock which has caused internal damage and death.
- 5) There needs to be benefits in GRUZ zone in the proposal for land based primary production to occur, above those in the RLZ, and residents of the GRUZ need to be aware and be prepared for the fact that land based primary production is the priority for this area. Complaints from small block holders need to be treated with this priority in mind by the WDC, and land based primary production should not be restricted.
- 6) Strategies for dealing with reverse sensitivity effects include:
  - a) Protecting the existing activity through rules in the district plan.
  - b) Requiring the new activity enter into a “no complaints” covenant via a land encumbrance.

In summary, due to the points, I have highlighted in these key takeaways, firstly, I strongly believe 666 Mt Thomas Road needs to be zoned RLZ due to its size, surrounding smaller parcels of land, fragmentation of the land in this area, soil types and inability to in itself be economically viable.

Secondly, if this area is to be zoned GRUZ more consideration needs to be given to prioritizing land based primary production over the needs of what are in effect Rural Lifestyle blocks within this zone, with further benefits given to land based primary production activities and minimal regulation.

Thirdly, I request that each parcel of land be considered on its individual characteristics as to whether it is in the GRUZ or RLZ, not collectively with overarching principles as outlined in the body of the Stream 12B Rural Rezone Requests S42A Report.

# Proposed Waimakariri District Plan

666 Mount Thomas Road,  
Fernside

Property ID: 2651

Area: 272,102.237 sqm

Legal Desc: RS 6926 8.093700

Ha



- 1. [Go to Property Service Proposed District Plan](#)
- 2. [Show full Proposed District Plan](#)
- 3. [Zoom to selected property](#)
- 4. [Clear selected property](#)

Notified: 22 Feb 2024

Revision: 22 Feb 2024

[Change](#)

The following information applies to this property

- Zones
- GRUZ
- [View section](#)

- Hazards and Risk Overlays
- Non-Jehin Flood Assessment Area



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