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## Submission on Waimakariri District Council - Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Waimakariri District Council - Development Planning Unit

**Date received:** 25/11/2021

**Submission Reference Number #:**102

This is a submission on the following proposed plan (the **proposal**): Waimakariri District Council - Proposed District Plan

**Address for service:**

C [REDACTED] Brown

[REDACTED]  
New Zealand

Email: charlie@rhodes.co.nz

**Submission on behalf of:**

M J Borcoskie Family Trust

**Attachments:**

Lifestyle.png

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **No**

## Submission points

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### Point 102.1

**Section:** GRUZ - General Rural Zone

**Sub-section:** GRUZ - General Rural Zone

**Sentiment:** Oppose

**Submission:**

This submission relates to the property at 666 Mount Thomas Road (“the Property”). The specific provisions of the proposal that my submission relates to are as follows:

This submission opposes the new rural zoning area rules of the proposed district plan which relate to the Property. It opposes the rationale behind which areas are designated General Rural Zone (“GRZ”) and which areas are designated Rural Lifestyle Zone (“RLZ”). Specifically, the submission challenges the way in which the Council has determined the boundaries of the GRZ and RLZ and the implications this has for the Property.

The following are some reasons behind the opposition to the proposed district plan. My submissions:

1. The Waimakariri District Council consultation summary says that the GRZ, while it contains a number of smaller sites, intends retain the prominent character of an open, large-scale productive landscape with open grassland, pastoral farming, cropland and small areas of forestry. The submitter disagrees with this interpretation and argues the distinction is arbitrary. The Property is actually 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. It is a contradiction to redefine the GRZ and then require resource consents for intensive indoor and outdoor farming activities. The rules are not consistent for a rural zone because many sites within the GRZ are in substance RLZ land. There is no benefit whatsoever to the GRZ zone 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.
3. The submitter does not believe the soils of the land in its area are of a type to justify the GRZ designation and would be better reflected as RLZ land. The attachment shows that the land is not an area with open large scale production available.
4. The attachment below highlights that the property is surrounded by small parcels of land that are more in the nature of RLZ land, despite being zoned GRZ. The Council will impose rates within the GRZ which includes these smaller blocks to the detriment of the farmers whom operate in GRZ.
5. Council subdivision of the land adjoining or adjacent to the Property have already impeded on rural activities
6. The Property is closer to a township than other land that has been zoned RLZ.
7. Given the fact that the Property is surrounded by smaller properties, reserve sensitivity issues will arise and it is unlikely the submitter will be able to use the land as intended by the GRZ designation. There appears to be no activity rules provided in the proposed district plan to mitigate these factors.
8. The imbalance and arbitrary nature of defining the RLZ and GRZ areas is likely to lead to subsequent benefits to those within the RLZ to the detriment of the GRZ.

**Relief sought**

We seek the following decisions from the Waimakariri District Council:

1. That the existing District Plan rules, as they apply to the property, remain unchanged.
2. Alternatively, the submitter seeks that its property is zoned RLZ and not GRZ.
3. If the land is to be zoned GRZ then the rules relating to that zone need to be amended to allow for any future subdivision to be either a controlled activity or a discretionary activity, to allow more flexibility in the future, and provide a better balance as to what may be in the best interests of a particular property where its inclusion with GRZ is more marginal than the other areas containing the best quality GRZ land.
4. If the GRZ zoning is to remain, the rules that apply need to be clear and concise and give greater ability for that land to be used as a rural lot, including more intensive rural related uses on the property. If GRZ land is incapable of future subdivision, then that zoning should have the widest possible meaning in terms of future use and development of that land, and that reverse sensitivity issues are adequately covered.

Search for an address:



Mount Thomas  
RNSIDE

Property ID: 2651

Legal Desc: RS 6926

3700 Ha

Property Specific Proposed  
Waimakariri District Plan  
Changes  
View the full Proposed  
Waimakariri District Plan  
Changes for selected property

Decision

Information applies  
to property

