

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:
244

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 THE NOTIFIED PROPOSED WAIMAKARIRI DISTRICT PLAN
DAVID COWLEY (PDP submitter 244)**

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in 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	The amendments sought are not realistic, achievable, necessary, or appropriate, and are inconsistent with the RMA and national policy direction, including the NPS-UD; and for the reasons outlined below. 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 (PWDP) amendments sought by David Cowley	Reject the amendments sought and provision sought be retained where these are inconsistent with and/or have implications for the relief sought by David Cowley submission and his 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	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.	Reject the submission

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	through further fragmentation of rural land			
316 Environment Canterbury	<p>316.8 UFD-P2</p> <p>Amend UFD-P2 to give effect to Chapter 6 in the Canterbury Regional Policy Statement.</p> <p>Concerned that clause 2 appears to provide for new Residential Development Areas within Greater Christchurch that are outside of the future development areas identified in Map A of the CRPS.</p> <p>To give effect to Policy 5.3.12 of the CRPS, the need to protect highly productive soils should also be considered when assessing any new development areas.</p>	Oppose	<p>The relief sought is contrary to the RMA and the NPS-UD. The latter provides for unanticipated (in RMA documents) and out of sequence development where this adds significant additional development capacity and contributes to a well-functioning urban environment; as is the case with the rezoning sought by David Cowley.</p> <p>Any amended wording needs to reflect the NPS-Highly Productive Land but also recognise the circumstances under which urban zoning of HPL is appropriate.</p>	Reject submission
316	316.9	Oppose	<p>The relief sought is contrary to the RMA and the NPS-UD. The latter provides for unanticipated (in RMA</p>	Reject submission

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
Environment Canterbury	Amend UFD3 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 Canterbury Regional Policy Statement Policy 6.3.9		documents) and out of sequence development where this adds significant additional development capacity and contributes to a well-functioning urban environment; as is the case with the rezoning sought by David Cowley.	
316 Environment Canterbury	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 NRMA and NPS-HPL which specifies circumstances where use of HPL for urban development is appropriate.	Reject submission
160 Rolleston Industrial Developments Ltd	The submission in its entirety, in relation to Introduction and General Provisions; SD - Objectives and UF&D (Urban Form & Development; Part 2	Support in part	Consistent with the RMA and NPS-UD 2020, except with respect to minimum and average lot sizes in the Large Lot Residential Zone.	Allow the submission, except where inconsistent with the relief sought by David

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	General District Wide Matters Urban Form and Development and Subdivision; Part 3 Residential Zones			Cowley's submission. In particular, Policy ResZ P14 and the subdivision and large lot residential zone provisions which should be amended to provide for a Large Lot Residential zone for the land the subject of the Cowley submission (and potentially other land) with a minimum lot size 1000m ² average lot size not less than 2000m ² .
360 Christchurch City Council	The submission in its entirety, in relation to matter raised under the submission headings 'Provision for urban activities in Development Areas in accordance with the	Oppose	Inconsistent with RMA, NPS-UD and NPS-HPL	Reject submission

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	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			
360 Christchurch City Council	360.9 Reconsider provisions that would enable development outside of the current future growth areas for consistency with the current collaborative crossagency planning framework in place to meet the reasonably foreseeable needs of land for future urban development in Greater Christchurch. Recommends review of the wording in UFD-P2(2)(a) as the meaning of the term 'concentrates' is not clear	Oppose	Inconsistent with RMA and NPS-UD	Reject submission
360	360.22	Oppose	Contrary to RMA and NPS-UD, and and NPS-HPL which sets out circumstances under which HPL can be rezoned for urban development.	Reject

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
Christchurch City Council	LLR Zones - Amend General Objectives and Policies for all Rural Zones, Rural Lifestyle Zone and Large Lot Residential Zone objectives, policies and rules to protect the highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying.			
360 Christchurch City Council	360.20 RURZ - General Objectives and Policies for all Rural Zones. Amend General Objectives and Policies for all Rural Zones, Rural Lifestyle Zone, and Large Lot Residential Zone objectives, policies and rules to protect the highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying.	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 economically viable production.	Reject submission

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
360 Christchurch City Council	360.21 RLZ – Rural Lifestyle Zone Amend General Objectives and Policies for all Rural Zones, Rural Lifestyle Zone, and Large Lot Residential Zone objectives, policies and rules to protect the highly productive land/versatile soils from fragmentation and unsuitable 'primary production' activities such as forestry or quarrying.	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 economically viable production.	Reject submission
295 Horticulture NZ	295.70 Amend SD-O2: "... 11. that avoids versatile soils and avoids creating incompatible activities on rural zone boundaries."	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	295.74, 295,205-212 UFD, P1-P8, P9 – amend to ensure the life supporting	Oppose	Contrary to RMA, NPS-HPL and NPS-UD (depending on wording of amendments sought – none given)	Reject

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	capacity of soils are safeguarded. No wording given.			
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
295 Horticulture NZ	295.119 LLR-R36. Delete	Oppose	LLRZ-R36 Primary production enables rural production to occur where land is zoned LLR but potentially not yet fully developed for this purposes. Development can occur in stages. It is also feasible to undertake primary production, albeit on a limited scale, on LLR sized lots	Reject submission
414 Federated Farmers	414.53 SD-04 Amend SD-04:	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 or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	<p>"...</p> <ol style="list-style-type: none"> 1. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; 2. limit other activities; 3. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities; and 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. " 			
414	414.58-66	Oppose	Inconsistent with RMA, NPS-HPL and NPS-UD. Proposed wording is vague and uncertain.	Reject

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
Federated Farmers	UFD P 1-9 Add to policies additional wording: "Avoid where practicable any development on LUC 1-3 soils."			
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.	Allow in part. Amended wording should be: "3. Minimise reverse sensitivity effects on primary production."
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

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
414 Federated Farmers	414.209 Amend SUB-P3(3) to add (e): "e. the treatment and/or attenuation of human sewage where the site size and characteristics permit it."	Support	Enables on site systems where circumstances including environmental effects are suitable for this. More flexible and enabling in accordance with the RMA	Accept submission
212 CSI Property; 237 Carter Group Ltd	212.3 Oppose Rural Lifestyle zoning of 301 Bradleys Road and rezone to General Residential Zone and Large Lot Residential Zone, with commercial zoning as required to service that area. 237.1 Rezone land at Ohoka legally described as Lot 2 & 3 DP 318615, Lot 2 & Part Lot 1 DP 8301, Lot 2 DP 61732, Lot 1 DP 55849, Lot 2 DP 55404, Part RS 2220, Lot 1 DP 318615 and Part Lot 1 DP 2267, a	Support in part.	This land is the subject of PC31 Ohoka. I have submitted in support of PC31 in part. The land the subject of my submission on the PDP is also at Bradleys Road, Ohoka. Support to the extent that the submission is consistent with the relief sought in my submission on the PDP (submission 244) which seeks LLR zoning (average lot size 2000m ²) of other neighbouring land in Bradleys Road and vicinity.	Accept submission to extent consistent with relief sought by David Cowley submission on PC31, and any other relevant documents including Variation 1 and the Proposed District Plan.

This submission is in relation to the submission of: (name & number)	The submission point I/we support or oppose is	I/we oppose in part or in full/support in part or in full	Reasons for my/our support/opposition are:	Decision I/we wish the Council to make:
	combination of GRZ (including an overlay providing for Educational facilities and retirement village activities), LLRZ, LCZ, and OSZ.			
228 Grace Cameron and; Nathan Wilson 2 David Lorns	228.1 Rezone 351 Bradleys Road, Ohoka (1505m ²) from Rural Lifestyle Zone to Settlement Zone 2.1 Rezone 351 Bradleys Road, Ohoka, a lot of 0.1505ha (more or less), from Rural to Residential.	Support in part.	I have sought that this land be rezoned LLR (minimum average lot size 2000m ² , minimum lot size 1000m ²) as it is part of the land I have sought to be rezoned LLR in my submission on the PDP.	Accept the submission to the extent it is consistent and compatible with relief sought in my submission on the PDP and any other relevant planning documents.
169 NZ Pork	169.12 Amend UFD-P2 Identification/location of new Residential Development Areas, to include criteria for considering effects on primary	Oppose	Not necessary or appropriate.	Reject submission

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	production and highly productive land			
325 Kainga Ora	325.3 SD-02 Urban development "Urban development and infrastructure that: 1. is consolidated and integrated with the well functioning urban environments; 2. that recognises existing character, planned urban form and amenity values, and is attractive and functional to residents, businesses and visitors; ... 4. provides a range and mix of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve at all times at least the housing bottom lines in UFDO1;	Support in part	Consistent with RMA and NPS-UD	Accept submission in re SD-02. NB consequential changes required to policy when new development areas are rezoned.

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325 Kainga Ora	325.7 UFD-O1 Amend UFD-O1: "There is, at all times, at least sufficient feasible development capacity for residential activity to meet specified housing bottom lines..."	Support	Consistent with RMA and NPS-UD	Accept submission
325 Kainga Ora	325.8 UFD-O2 Amend UFD-O2: "There is, at all times, at least sufficient feasible development capacity to meet commercial and industrial development demand over the short term, medium term and the long term."	Support	Consistent with RMA and NPS-UD	Accept submission
325 Kāinga 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 Maps,	Oppose in part to the extent that it is inconsistent with, or has	Opposed / supported to extent inconsistent with my interests and the relief I seek in my submission on the PDP (submission 244)	Reject the submission to the extent that it is inconsistent with or

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	NEW, including but not limited to the specific points above.	implications for the relief sought by David Cowley (submission 244)		has implications for the relief sought by the David Cowley (submission 244)
224.2 McCracken & Associates	Support UFD-P3(2), which enables a new Large Lot Residential Zone development that is not included in the Rural Residential Development Strategy or the District Plan Review.	Support retention of UFD-P3(2)	Consistent with my submission and interests	Retain UFD-P3(2)
224.3 McCracken & Associates	Support SUB-O1 in general but seek minor amendment to recognize that rural residential is a desirable housing choice and part of a flexible and diverse housing market, and which should be included in the subdivision design objectives: "... 2. Consolidates urban and rural residential development and maintains rural character	Support	Consistent with my submission and interests	Accept submission

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	except where required for, and identified by the District Council, for urban or rural residential development.			