

## DEVELOPMENT PLANNING UNIT

# Submission on Variation 1: Housing Intensification

Clause 6 of Schedule 1, Resource Management Act 1991

### Submitter details

(Our preferred methods of corresponding with you are by **email** and **phone**).

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Please select one of the two options below:

- ☒ I **could not** gain an advantage in trade competition through this submission (*please go to Submission details, you do not need to complete the rest of this section*)
- ☐ I **could** gain an advantage in trade competition through this submission (*please complete the rest of this section before continuing to submission details*)

Please select one of the two options below:

- ☐ I **am** 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 effect of trade competition.
- ☐ I **am not** 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 effect of trade competition.

## Submission details

The specific provisions (objectives, policy and rules) of the proposal that my submission relates to are as follows:  
(please give details)

Please find the attached submission

My submission is that: Please indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons  
(include additional pages as necessary).

I/we have included: 24 additional pages

I/we seek the following decision from the Waimakariri District Council: (give precise details, use additional pages if required)

## Submission to Variation 1

### Introduction

While I appreciated that the Waimakariri District Council is obligated to adopt this Variation to its District Plan, I think it is important that every effort is made to mitigate its adverse effects on the current built environment of Kaiapoi and Rangiora.

Despite the general provision to provide for medium density housing development across urban environments in the Waimakariri District, the matters that I am most concerned about may be considered under the *RM Amendment Act 2021*:

*Section 77I (j) states "any other matters that makes higher density, as provided for by the MDFS or policy 3, inappropriate in an area, but only if section 77L is satisfied".*

My major concerns are that:

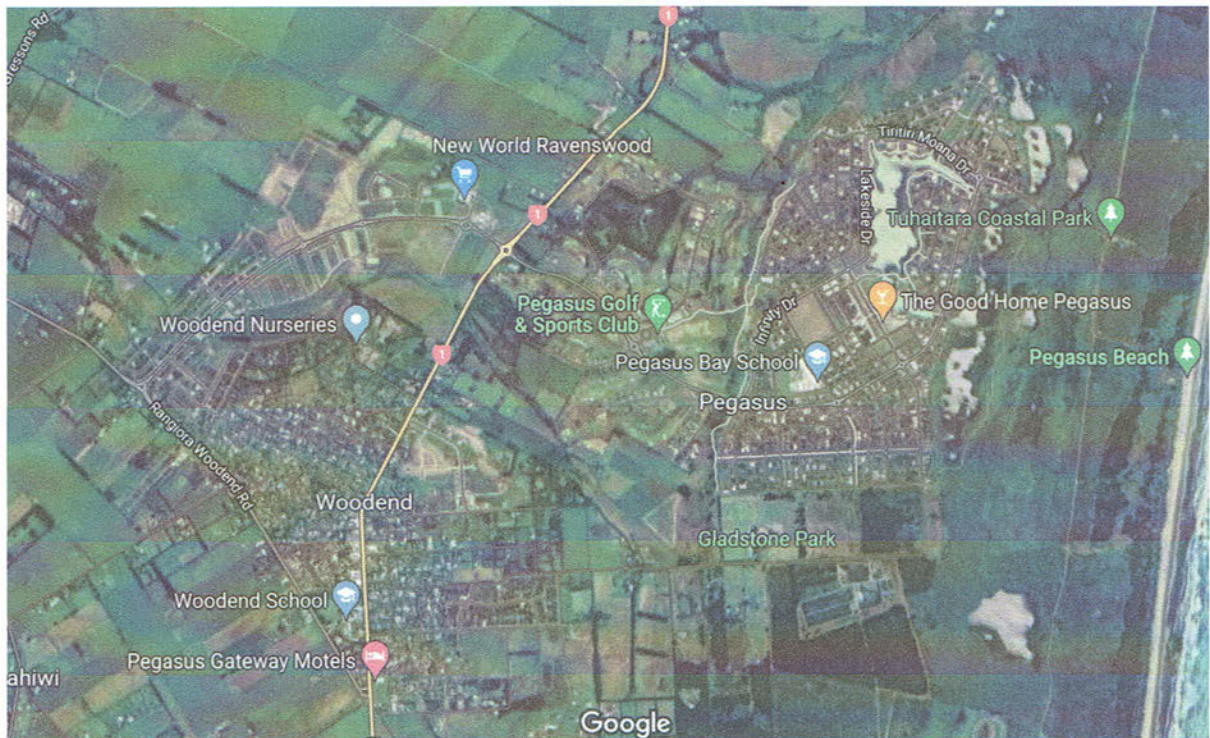
- it is inappropriate for Woodend and Pegasus to be considered as a single residential area and thus with a qualifying population based on the 2018 Census;
- the existence of the Christchurch International Airport Ltd. noise contour over Kaiapoi should not constrain the comprehensive redevelopment of the properties in North Kaiapoi owned by Kainga Ora;
- the resulting in-fill developments will have an unreasonable impact on people's enjoyment of neighbouring properties, particularly in respect to privacy and access to direct sunlight and this should be mitigated;
- the increases in site coverage as the result of in-fill development will create difficulties for stormwater management in lower-lying parts of Rangiora and Kaiapoi;
- the removal of any mature trees associated with in-fill development in the loss of an important environmental resource that has the potential to assist in mitigating the effects of the heating of urban environments due to climate change;

### The status of Woodend and Pegasus

I consider that it is inappropriate for Woodend/Ravenswood and Pegasus to be treated as a single urban area for the purposes mandated by the *RM Amendment Act 2021*.

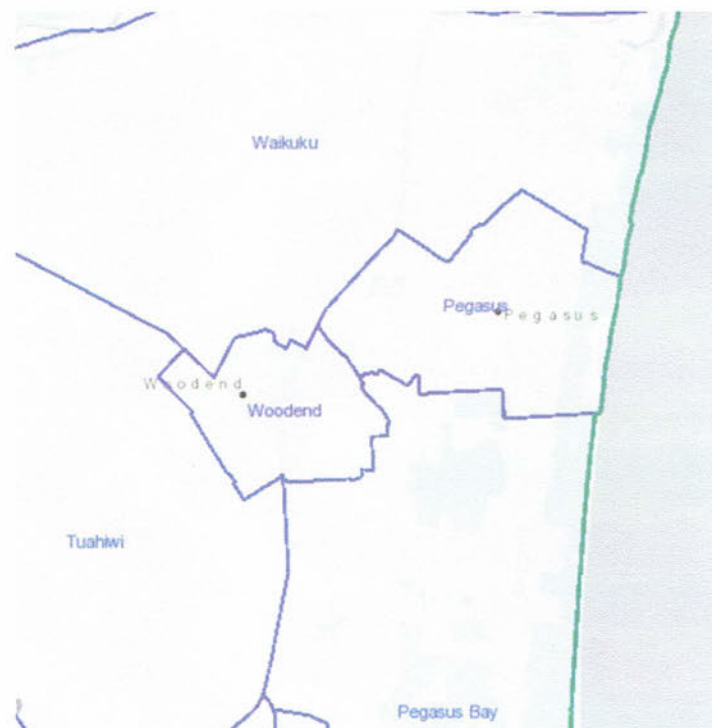
These two urban areas are clearly separate when viewed from an aerial map. The following map taken from Google Maps on 8 September 2022 clearly shows Pegasus as bounded to the west by the Western Ridge Reserve and to the south by Gladstone Park. Between the park and the Woodend urban area there is rural land characterised by a number of small holdings.





The populations recorded for the relevant Statistics New Zealand Area Units of Woodend and Pegasus both recorded populations of below 5000 people at the 2018 Census, and there is no provision for an increase of the urban area of Pegasus.

The following map copied from the Statistics NZ website shows the area included in the Pegasus and Woodend Area Unit. At the 2018 Census the Pegasus Area Unit had a usually resident population of 2637 people and the Woodend Area Unit had 2784 people.

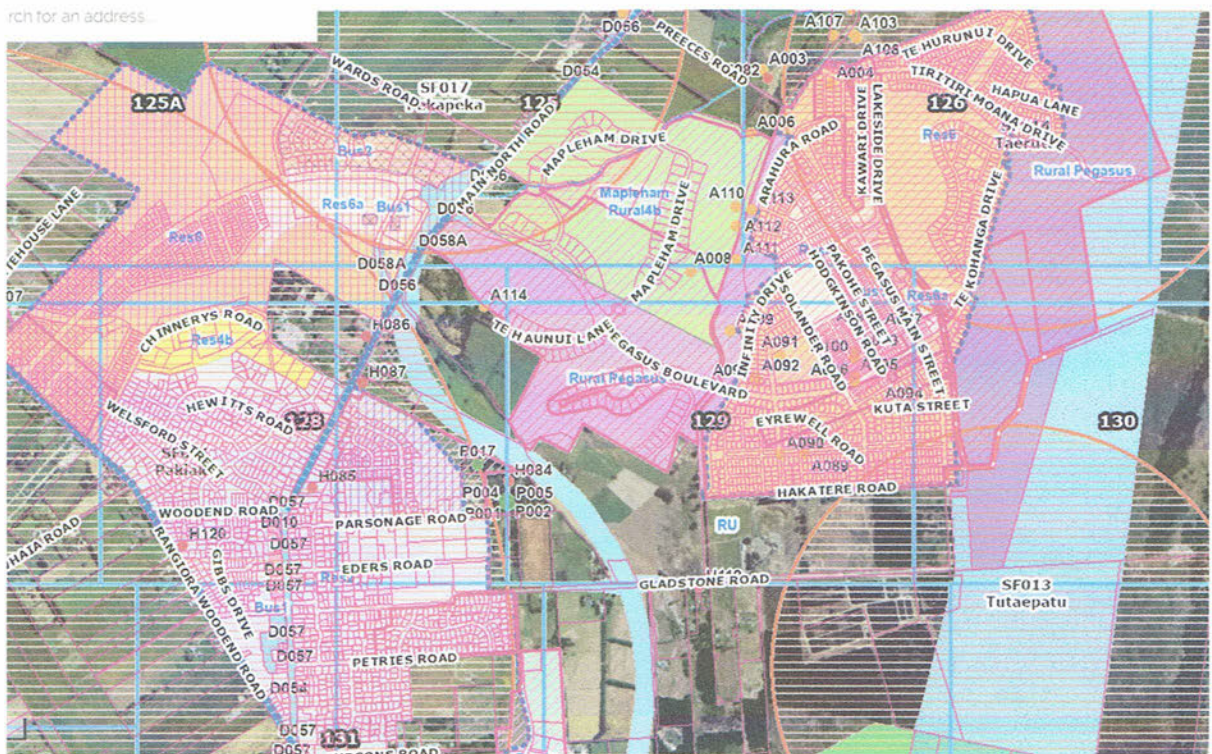




It is also important to recognise that Pegasus has been developed along “New Urbanist” principles and is characterised by more intensive development than the Residential 2 zoning that has been used for the outer areas of Kaiapoi and Rangiora. In addition, Pegasus has areas of terrace style housing as well as some larger residential lots. Taken together it is inappropriate for Pegasus to be treated along with Woodend as a qualifying urban environment. Although the Pegasus Area Unit bounds the Woodend Area Unit, but this is because it includes the large lot area of Maplesham which is excluded from consideration.

While the population of the Woodend/Ravenswood area may exceed 5000 in the new future it is important to recognise that lot sizes in the Ravenswood development have been varied to provide opportunities for more affordable smaller lots. Also, considerable attention was paid during the planning stage for this development to ensure that the urban design controls introduced for the smaller sections ensured the maintenance of the amenity values of this area.

The following map reinforces the separation between the Woodend and Pegasus and shows the two towns divided by the designation for the Woodend bypass, which although planned may never eventuate. It does nevertheless reinforce the division between the two areas.



## Kaiapoi Redevelopment by Kainga Ora

The Government Agency Kainga Ora has a number of sections in North Kaiapoi, and I understand that the redevelopment of these is planned. The impact of the constraints on the intensification of residential development under the 50 dBA Ldn in Kaiapoi should not constrain the intensification of the use of the properties owned by Kainga Ora if the Agency chooses to build a complex similar to the one Rangiora on High and Whites Streets.

## The impact of intensification on existing urban environments

One of the longer standing assumption associated with planning is that people purchasing a property can have reasonable confidence about the developments that may occur in the



immediate vicinity. This Variation represents a significant departure from this, and as far as possible efforts should be made to mitigate the most severe adverse effect on properties adjacent to an in-fill property developed under this Plan Change.

Of most concern is the adverse effect on privacy and access to direct sunlight. If at all possible, performance standards should be attached to the permitted activity status introduced by this Variation.

### **Stormwater Management**

Urban intensification introduced after the design of stormwater systems is understood to be likely to create significant problems. Close attention needs to be paid to the lower lying areas in Rangiora as well as Kaiapoi to ensure that the disposal of stormwater is not exacerbated by in-fill mandated by this Variation.

It is noted that the District's current Proposed District Plan has increased the site coverage allowed in the main residential zone but also requires that there must also be 30 percent permeability on a site. This highlights the importance of the disposal of stormwater to ground in the District's urban environments.

The more recently developed areas of Rangiora in particular are characterised by substantial stormwater retention areas. Although these areas can hold back the transfer of stormwater from the older parts of the town for a period during heavy rain, it is important to recognise that it may become difficult to manage stormwater across the town as a whole, as increasingly intensive rainfall episodes are projected as our climate changes. This needs to be taken into account when considering the areas to which Variation 1 will apply.

### **The potential removal of mature trees from Kaiapoi and Rangiora**

The issue of the removal of mature trees from the urban environments should not be limited to the protection of significant trees listed in the District Plan. All mature trees have value in the urban environment and warrant protection from being removed to allow medium density housing. Mature trees will become increasingly valuable as climate change makes our residential areas hotter as the hard surfaces hold the increasing heat.

I wish to be heard in support of my submission.

## Submission at the hearing

- ☒ I/we wish to speak in support of my/our submission
- ☐ I/we do not wish to speak in support of my/our submission
- ☐ If others make a similar further submission, I/we will consider presenting a joint case with them at the hearing

## Important information

1. The Council must receive this submission before the closing date and time for submissions.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and public. Your submission will only be used for the purpose of the Plan Change/Variation process.
3. Only those submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officer's report (please ensure you include an email address on this submission form).

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**Send your submission to:** Submission  
Waimakariri District Council, Private Bag 1005, Rangiora 7440

**Email to:** developmentplanning@wmk.govt.nz  
Subject line: Submission Variation 1: Housing Intensification

**Phone:** 0800 965 468 (0800WMKGOV)

**You can also deliver this submission form to one of our service centres:**

**Rangiora Service Centre:** 215 High Street, Rangiora

**Kaipoi Service Centre:** Ruataniwha Kaiapoi Civic Centre, 176 Williams Street, Kaiapoi

**Oxford Service Centre:** 34 Main Street, Oxford

**Submissions close 5pm, Friday 9 September 2022**

**Please refer to the Council website [waimakariri.govt.nz](http://waimakariri.govt.nz) for further updates**