

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 #:99

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

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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

Point 99.1

Section: SUB - Wawahia whenua - Subdivision

Sub-section: Subdivision Standards

Provision:

SUB-S1 Allotment size and dimensions

Activity status when compliance not achieved:

1. All allotments created shall comply with Table SUB-1.

1. In the Medium Density Residential Zone, any Industrial Zone and Special Purpose Zone (Kaiapoi Regeneration): DIS
2. In any other zone: NC

Sentiment: Amend

Submission:

Table Sub-S1 does not:-

1. Recognise existing character as required by Obj SD-02 (2)
2. Provide for a range of housing opportunities as required by Obj SD-02(4)

In reducing the minimum lot size in the General Residential Zone (GRE) to 5400m², and applying that generically across all urban area, it does not recognise that Oxford has a distinct character. Oxford is not Rangiora or Kaiapoi. Oxford does not have any public transport. Oxford is self-sufficient for the basics of small town life - supermarket, butcher, pharmacy, pubs, cafes & restaurants, hardware, medical and education. It is a village, not an urban conurbation. Oxford is predominately larger lots (1000-2000m²) by today's standard, despite the infill subdivision that has occurred over the last decade or so. The current minimum lot size of 600m² in the operative plan is resulting in all new subdivision within the established urban area is tending towards the minimum, as owners seek to maximise the return on the land. Thus all recent and future subdivision will be reduced to the minimum lot size. If this is reduced to 500m², then that is where owners will aim towards within the main urban area.

5000m² is a very large lot in terms of an urban area. It may have been appropriate in the desire to limit the explosion of smaller lots in the rural zones as experienced in the past. As a way of enabling and managing the expansion of an existing township, it imposes inappropriate constraints. In retaining the existing Large Lot Residential (LLR) around the town, with the 5000m² average requirement, it restricts the future supply of new lots as the town expands to either small lots (500-600m²) if zoned GRE or very large lots if zoned LLR. There is no realistic provision for anything in between. The market will seek to maximise the output in any subdivision, forcing the lot sizes toward the minimum allowed within the zone, and requiring expensive resource consent processes to enable any development less than the minimum within the LLR zone.

Effectively, within new subdivisions, there will be no options between small lots (5-800m²) and very large lots (5000m² average). They will be no option for a 1000-2000-300-4000m² section without an expensive resource consent application for a non-complying activity. This does not provide for a range of housing types, it does not provide choice in lot size, given most purchasers will only have the option that the subdivider provides. It does not provide for a range of affordable housing options.

It is effectively constraining the growth of Oxford to LLR to the north

SUB-S1 Allotment size and dimensions

1. All allotments created shall comply with Table SUB-1.

Activity status when compliance not achieved:

1. In the Medium Density Residential Zone, any Industrial Zone and Special Purpose Zone (Kaiapoi Regeneration): DIS
2. In any other zone: NC

Relief sought

1. Increase the minimum lot size in the existing Oxford residential area to 600m² as per the operative plan.
2. Enable the outward growth of Oxford with lot sizes ranging from 800m² up to around 2000-2500m²
3. The current LLR zones on the northern and eastern edges of the town should be enabled for lot sizes in the range (say) 2000m² to 5000m², with the expansion area to the north (currently zoned rural with a LLR overlay) enabled for lots between (say) 2000m² and 5000m²
4. Remove the Average 5000m² requirement for LLR areas on the town periphery, and replace it with a maximum lot size of 5000m², with a minimum lot size of (say) 2000m².

In the alternative, provide for lots of 2000-5000m², with an average lot size of less than 5000m² to be a restricted discretionary activity (Sub-S1) viz.

Activity status when compliance not achieved:

1. In the (Oxford) LLR zones, subdivision down to a minimum lot size of 2000m², with an average lot size of less than 5000m² RDIS
 2. In the Medium Density Residential Zone, any Industrial Zone and Special Purpose Zone (Kaiapoi Regeneration): DIS
 3. In any other zone: NC
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Point 99.2

Section: SD - Rautaki ahunga - Strategic directions

Sub-section: Objectives

Provision:

Urban development

Urban development and infrastructure that:

1. is consolidated and integrated with the urban environment;
2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors;
3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available;
4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1;
5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:
 - a. the primary centres for community facilities;
 - b. the primary focus for retail, office and other commercial activity; and
 - c. the focus around which residential development and intensification can occur.
6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;
7. provides people with access to a network of spaces within urban environments for open space and recreation;
8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga;
9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and
10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.

SD-O2

Sentiment: Amend

Submission:

This objective and the whole document needs explicit references to affordable housing. This should be encompassing of affordability of a range of housing types and across all zones - there should be affordable LLR and RR lot, not just small urban lots.

It also needs to include the outward growth of Oxford. There is currently no identified growth areas in and around Oxford, other than the LLR area to the east of the town and the LLR overlay to the north. There needs to be provision and encouragement for the outward expansion of the town with lot sizes in character with the town - 1000-2000m²

Relief sought

Urban development

Urban development and infrastructure that:

1. is consolidated and integrated with the urban environment;
2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors;
3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available;
4. **provides for affordable housing options in all zones across the district**
5. provides a range of housing opportunities, focusing new residential activity within **and around** existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in UFD-O1; supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being:
 - a. the primary centres for community facilities;
 - b. the primary focus for retail, office and other commercial activity; and
 - c. the focus around which residential development and intensification can occur.
6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency;
7. provides people with access to a network of spaces within urban environments for open space and recreation;
8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga;
9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and
10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in SASM-SCHED1.

SD-O2

With appropriate changes made though the policies and rules to reflect the objective

Point 99.3

Section: LLRZ - Large Lot Residential Zone

Sub-section: Introduction

Provision:

The purpose of the Large Lot Residential Zone is to provide residential living opportunities for predominantly detached residential units on lots larger than other Residential Zones. The Large Lot Residential Zone are located near but outside the established townships. Some opportunity is also provided for rural activities where the effects of these activities will not detract from the purpose, character and amenity values of the residential zone.

There are particular landscape characteristics, physical limitations or other constraints to more intensive development. Any opportunity for intensification is reliant on sites being appropriately serviced, natural hazard risk being managed and the density requirements for rural residential development directed by the RPS being achieved.

The provisions in this chapter are consistent with the matters in Part 2 - District Wide Matters - Strategic Directions and give effect to matters in Part 2 - District Wide Matters - Urban Form and Development.

As well as the provisions in this chapter, district wide chapter provisions will also apply where relevant.

Sentiment: Amend

Submission:

The introduction is incorrect in stating that LLR zones are "located near but outside the established townships". In Oxford they are within the township on the northern side (accessing off Church St, Queen St, Wilsons Rd, High St, Bay Rd and Victoria St). These areas are not separate from the township but part of the township.

Relief sought

The purpose of the Large Lot Residential Zone is to provide residential living opportunities for predominantly detached residential units on lots larger than other Residential Zones. The Large Lot Residential Zone are located **within, on the edges of, and near to**, the established townships. Some opportunity is also provided for rural activities where the effects of these activities will not detract from the purpose, character and amenity values of the residential zone.

There are particular landscape characteristics, physical limitations or other constraints to more intensive development. Any opportunity for intensification is reliant on sites being appropriately serviced, natural hazard risk being managed and the density requirements for rural residential development directed by the RPS being achieved.

The provisions in this chapter are consistent with the matters in Part 2 - District Wide Matters - Strategic Directions and give effect to matters in Part 2 - District Wide Matters - Urban Form and Development.

As well as the provisions in this chapter, district wide chapter provisions will also apply where relevant.

Point 99.4

Section: Description of the District

Sub-section: Description of the District

Provision:

The close proximity of Christchurch District influences growth and development patterns in the District. A large portion of the District is flat land used for farming. More recently, smaller rural properties have established for those wanting to live near Christchurch District but within a rural area. The north-western portion of the District is hill and high country including Mt Oxford, Mt Richardson and Mt Thomas. Much of the high country is conservation estate and is a dominant feature of the western landscape.

Some 80% of the population is located in the eastern part of the District which contains the largest towns of Kaiapoi, Rangiora and Woodend/Pegasus. Oxford is the largest town in the west of the District. A number of smaller settlements are located within the District, including Cust, Sefton, and Ashley and the beach settlements of Waikuku Beach, Woodend Beach, The Pines Beach and Kairaki. Large lot residential development (formerly known as 'rural residential' and zoned Residential 4A or 4B) is mainly located in areas zoned for that purpose in locations including Mandeville North, Fernside, Ohoka, Clarkville, Swannanoa, Loburn, Waikuku, Waikuku Beach, Ashley, Waiora Lane, West Eyreton and the outskirts of Oxford.

A range of natural hazards affect the District, some of which may be exacerbated by the effects from climate change. These hazards include flooding, fault rupture, liquefaction and coastal inundation. Some areas are more susceptible than others to natural hazard events, and it is important to improve the District's resilience to natural hazards and mitigate or avoid exposure of people and communities, property and infrastructure to the risk of natural hazards.

Sentiment: Amend

Submission:

The LLR zone in Oxford is part of the town, on the northern side, not on the outskirts.

The general description does not capture the different character and flavour that Oxford has compared to the other large towns of the district.

Relief sought

Some 80% of the population is located in the eastern part of the District which contains the largest towns of Kaiapoi, Rangiora and Woodend/Pegasus. Oxford, the largest town in the west of the District, **has a different character to Rangiora/Kaiapoi/Woodend.** ...

Large lot residential development (formerly known as 'rural residential' and zoned Residential 4A or 4B) is mainly located in areas zoned for that purpose in locations including Mandeville North, Fernside, Ohoka, Clarkville, Swannanoa, Loburn, Waikuku, Waikuku Beach, Ashley, Waiora Lane, West Eyreton and **within and around** Oxford.