

Proposed Waimakariri District Plan Stream 10 A Written Representation

- 1) We are longstanding landowners and residents (40 years) at 75 Oxford Road, our land now being part of the West Rangiora Development Area. We submitted (sub 298) on the draft of the Proposed District Plan.
- 2) Thank you for the opportunity to provide a written representation relating to Plan Stream 10a in addition to our initial submission. Family health issues precluded us from being able to appear at the hearing at this time.
- 3) Our representations relate to the responses and recommendations in the Council's Section 42A report and responses to our submission. We cover the following key issues:
 - a. The West Rangiora Development Area is suitable for further new housing in line with the RPS.
 - b. Use of the Outline Development Plan (ODP) and certification process has limitations as the method for planning housing in the area.
 - c. Roading provisions in the proposed ODP are poor urban design.
- 4) We support the proposed West Rangiora Development Area but not all the details and methods within the Proposed Plan. Our support is based on the proximity of this area to Rangiora centre and easy access to the amenities and services there, along with excellent existing road linkages within and beyond Rangiora. We note that the RPS already formalises West Rangiora as a future urban development area. The s42A report notes our support.
- 5) We consider, however, that the proposed ODP and certification process are an inappropriate method for planning housing in the area. In our view the s42A report (*6.17.1 Matters raised by submitters*) does not weigh adequately the concerns of land holders in the area about the OPD and certification process (refer to the submitter summaries and responses in the s42A report).
- 6) Other submitters in the area (eg., Dalkeith Holding, Hales, 199 Johns Road, Eliot Sinclair) have raised similar concerns about the fixed nature of the proposed ODP and the ability of the certification process as a method to deliver housing and associated services and amenities in the area as part of an efficient urban environment. They also point out potential inconsistency with other approaches to housing development in new subdivisions. We agree with these concerns.
- 7) We suggest that residential zoning is a less complex and more flexible approach that provides developers with the flexibility to deliver a range of housing sizes and types (including medium density), physical infrastructure, minor road layouts and other transport modes, and green space, working with the Council through subdivision plans.
- 8) We note that the s42A report recommends that our, and other submitter, comments about residential zoning should be heard later at the Stream 12 hearing, and we will

appear then to support our viewpoint. However, we emphasise here that this is a broader issue relevant to the Proposed Plan, with the proposed ODP and certification of consents under consideration in Stream 10A.

- 9) We have raised a specific concern about the proposed Movement Network in the proposed ODP. The s42A report comments that a new road is required. We agree new roads are necessary but submitted against the proposed West Rangiora Movement Network, as shown in the ODP, because a new straight road between Oxford and Johns Road (parallel to Lehmans Road) is unnecessary and poor urban design. We support a local road network along with good walking and cycling connections that provide connectivity for residents.
- 10) We have noted, in the s42A report (6.17.1), the s42A assessment of Jonathon Renwick's (114.1) point that a straight road can become a "racetrack". The Report responds that that behaviour is not a matter for a district plan (6.17.2). We consider this is a strange response as there is an extensive research literature on the direct links between urban planning and design, human behaviours, and health.
- 11) We support a range of housing types, including medium-density housing, in the Future Development Area but question if locating medium density housing along a new direct road between Oxford Road and Johns Road, as shown in the ODP, is an effective way to achieve good urban design and a well-functioning urban environment. Generally, planning policy is looking to achieve more dense neighbourhoods with less driving. National guidance points to suburban areas needing low-traffic neighbourhoods, good speed management, active modes and high community amenity (see Waka Kotahi, "*Aotearoa urban street planning and design guide*").¹
- 12) We have observed that the existing through roads of Oxford Road, Lehmans Road, Johns Road and West Belt already provide excellent connections to and beyond West Rangiora. Local roads within the West Rangiora Future Development Area can provide sufficient connectivity to these major roads that are a very short distance away in any direction.
- 13) We also note that none of the through roads in nearby new subdivisions are straight but they work well. Consider, for example, Acacia Avenue, Oakwood Drive and Westpark Boulevard.
- 14) Consistent with our para 7 (above) developers need to be flexible to work with Council on the optimum layout of infrastructure and medium density housing, following urban design protocols to achieve the best outcomes for residents.

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¹ <https://www.nzta.govt.nz/resources/aotearoa-urban-street-planning-and-design-guide/>