

DISTRICT PLAN REVIEW

Proposed Waimakariri District Plan - Submission

Clause 6 of Schedule 1, Resource Management Act 1991

Submitter details

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

Full name: G Edge

Email address: grant@edgelandscapes.co.nz

Please select one of the two options below:

- ☒ I **could not** gain an advantage in trade competition through this submission (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 of the proposal that my submission relates to are as follows: *(please give details)*

See attached letter

My submission is that: *(state in summary the Proposed Plan chapter subject and provision of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons) (please include additional pages as necessary)*

I/we have included: 4 additional pages

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

See attached

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 District Plan review process.
3. Only those submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers 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: Proposed District Plan Submission
Waimakariri District Council
Private Bag 1005, Rangiora 7440

Email to: developmentplanning@wmk.govt.nz

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

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

Oxford Service Centre: 34 Main Street, Oxford

Submissions close 5pm, Friday 26 November 2021

Please refer to the Council website waimakariri.govt.nz for further updates

November 25, 2021

The Waimakariri District Council
Private Bag 1005
Rangiora 7440

Attention: District Planner

**WAIMAKARIRI DISTRICT COUNCIL
SUBMISSION TO PROPOSED DISTRICT PLAN**

Back ground

I am a resident at 238 Easterbrook Road and have lived in the District for over 15 years.
I am a professional Landscape Architect with over 35 years' experience in Landscape planning and design.
I am a Canterbury Regional Councilor representing the people of North Canterbury.
I am former community member and deputy chair of the Waimakariri District Council's Water Zone Committee.
I am a member of the Waimakariri Central Rural Drainage Advisory Group.

This is a personal submission.

Why I am making this submission

I am keen to support some sections of the plan and make comments on others.
I have just concentrated on Subdivisions and the Rural Lifestyle Zone within which we live and work.

Unfortunately, due to time constraints I have not been able to comment on other matters of interest.

**PART 2 DISTRICT WIDE MATTERS
SUBDIVISIONS**

Supportive of most Policies -although may seek clarification on some matters

Sub-P1, Sub-P2, Sub-P3, Sub-P4, Sub-P5

Sub-P6 Criteria for Outline Development Plans

H – Critical for new subdivision designs and ODP's to be structurally based around integration with the natural environment and natural features such as waterways, springs and wetlands. Ensure generous off-road connections that thread open spaces and stormwater discharge and retention through subdivisions so that recreational activity, multi-modal active transport (walking and cycling) and plantings can all occur together as a larger corridor with connections to achieve the 500m linkages between allotments and roads and public transport.

Avoid pocket parks that are disconnected from other open spaces.

Ensure all streets are designed with wide berm/footpath areas to facilitate tree planting and good accessibility for elderly, disabled and where possible use shared active transport spaces.

ACTIVITY RULES

Matters of Control/Discretion are Restricted

Subdivision Design

Seek clarification to ensure that subdivision design involving integrated planning for Blue/Green infrastructure and open spaces are a matter for Council's discretion.

I am concerned for example about the ODP proposed on Kippenberger/Golf links Road and the proposal to establish housing and infrastructure over land that may include multiple springheads which are source water for the Cam River and Taranaki River. These features need to be exposed and protected within developments. Stormwater off roads and properties should run through wetland filtration basins that deliver discharges meeting attribute values of the NPS FW stormwater prior to entering any natural waterway.

SUB-R4 Subdivision within flood hazard areas

Natural Hazard areas

I am concerned about locating housing development east of the current Kaiapoi township toward the sea.

We already know that this area may be subject to coastal inundation and flooding. Placing people in harm's way should not occur. Raising house platforms, filling in low lying ground has ramifications for people, property, public infrastructure and ratepayers in the future. Relying on mechanical pumping to discharge water in times of significant storm events is a risk to the community. This proposal needs careful assessment to avoid known natural hazards and repercussions resulting from the cumulative effects of development in this sensitive environment.

Rigorous assessments and evaluations of known and future predicted hazards related to climate change needs to be at the forefront of Council's subdivision planning to avoid these hazards and avoid taxing ratepayers for protection measures that could be avoided by not locating in these places.

SUB-R9 Outstanding natural Landscapes and features

Significant Natural Areas

Seek clarification of landscape and ecological assessment processes that underpins these areas. I am concerned of reports that some SNA's may have been removed from assessment processes. Seek clarification.

SUB-S3 Residential Yield

Residential yield and urban development to comply with NPS-UD.

Provide for and encourage creative medium density cluster development with generous open space for communities to achieve the 12 households using different typologies to create quality green housing environments.

Also provide for and encourage mixed housing models to achieve the 12 households using different typologies.

Incentivise where necessary.

SUB-S4 Areas subject to ODP

I am very skeptical of the ODP process in so far as final plans seem to depart from the ODP framework and the public and stakeholders don't then get to object further to elements of proposals that are inconsistent with the ODP. To provide certainty, I would rather that Council require a Master Plan approach for approvals so that the community in a notified situation can comment on realistic proposals that have undergone more scrutiny from Grant Edge Submission Proposed District Plan

Council staff and key stakeholders , professionals and agencies. My skepticism comes from my knowledge of the Southbrook Industrial subdivision ODP where no access points were shown off Fernside Road and now there are six with very little screen planting for amenity adjacent to a rural zone outlook. But I do realize that Council has paid more attention to urban design and amenity outcomes in this proposed plan, so this is good.

SUB-15 Stormwater Disposal

Further to my previous comments about an integrated approach to subdivision design, I am seeking a greater level of natural overland flows and filtration at critical source areas prior to entering a natural or modified waterway or drain. I am skeptical about the use of engineered stormwater storage facilities that direct stormwater off subdivisions directly into ground water without sufficient treatment or testing of water quality prior to entering the groundwater shaft. Pipe and reticulated stormwater systems are an asset liability and I think they are unnecessary in many situations. Stormwater when visibly used in urban spaces provide a great opportunity for associated public amenity and biodiversity. It also means less cost to the developer and future rates burden on residents.

SUB-17 Esplanade Reserves

I would like to see these areas being used in a much more comprehensive way and be designed creatively. The minimum requirements are in my opinion not sufficient over long lengths to provide for multiple issues such as safe and generous pathway spaces, space for biodiversity and riparian vegetation and allowing for gentle gradient slopes at edge of river. The RMA defines a river as also being a modified river such as a drain or narrowed waterway. Restricting consideration of these strips for situations of 3m river definition does not accommodate the tremendous amenity values that can be afforded by smaller waterways emanating from wetlands or springs across the district. The Mill Stream walkway near Bradley's Road is an example where a small water way provides for great recreational value to the local community.

I would like to see planning for these to be a restricted discretionary activity to provide oversight and good urban design.

I am seeking exemplar urban design outcomes for all new subdivisions.

SUB-S18 Subdivision to create a Bonus allotment.

I am unclear at this stage about the merit of these. SNA's are required to be protected in any event. To offer a bonus to protect them seems counter to a requirement. However, where the extent of the SNA is increased to provide a larger protected area as part of an integrated solution to improve Biodiversity , then that is an acceptable solution and use of the Bonus allotment.

These SNA open spaces and high value ecological areas need to be protected and seen as assets by the community and the developers. The Waimakariri Zone Implementation Plan Addendum, and the Canterbury Biodiversity Strategy and the RMA for that matter identify outcomes seeking protection and enhancement of valuable biodiversity. Waimakariri only has 10% of its natural biodiversity left and needs to provide opportunities to improve the situation. I commend the Council for some recent initiatives such as the Cam River enhancement project.

PART 3 -AREA SPECIFIC MATTERS

RURAL LIFESTYLE ZONE

The following comments concern me personally as a resident in this new Zone. Having been involved with an industrial plastics factory being built 100m from my *lifestyle* property and even closer to others because of a lack poorly defined activities in a rural zone, it is good to see that *lifestyle* properties now have some protections against activities that are contrary to the rural character and amenity values which people found desirable in their purchase of those properties.

I wish to support the inclusion of the Rural Lifestyle Zone.

However, I am a bit concerned about a couple of Objectives.

RLZ-R11 Rural Industrial

This is still of some concern where rural *industrial* activities could still be built next to residential lifestyle properties purchased for a quieter life in the country. I would like to see full Limited notifications for neighbouring properties for 1000m for activities that are likely to occupy an area approaching 500m². This is still quite large and potentially affecting rural amenity values. I do note however the proposal for consideration of Character and Amenity values which are discretionary restricted which I welcome.

RLZ-R17 Bonus Residential unit

See comments re Sub-S18 above

RLZ-BFS4 Building and structure setbacks

For residential or minor residential dwellings, I would like to see the distances increased to 40m. It is important in the rural environment for rural character to be maintained at the property boundary.

I support limited notification in some situations. Design outcomes such as landscape treatments and screen or full plantings will play an important role in maintaining rural character. Similarly building form and design can impact on rural character.

Request to be Heard

I request to be heard and present my submission to the Council's panel.

Yours sincerely



Grant Edge
BA, Dip.LA, FNZILA Registered

Contact details

238 Easterbrook Road
RD1 kaiapoi 7691

0272299529

grant@edgelandscapes.co.nz

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