

**SUBMISSION ON PROPOSED WAIMAKARIRI DISTRICT PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT
ACT 1991**

To: Waimakariri District Council
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developmentplanning@wmk.govt.nz

Name of Submitter: A [REDACTED] Thomson [REDACTED] R [REDACTED] Thomson

1. The specific provision of the Proposed District Plan that this submission relates to are as follows:

1.1 RLZ - Rural Lifestyle Zone

1.2 NH- Natural Hazards

2. The submission is that:

2.1 I have lived in Jeffs Drain Road Ohoka for fifty years and have seen many changes in the nature of the land use as it has gone from dairy, beef and sheep and pig farming to life style block ownership. My husband Rob Thomson and I now own the property at 29 Jeffs Drain Road, Ohoka.
Legal description Lot 1 DP 74862 BLK XIV Rangiora SD.

In my opinion which is shared by many locals the 4 hectare lots don't really serve any valuable purpose as they are too small for productive rural activities and too big for rural lifestylers who have little interest and lack the knowlwdge required for farming activities.

2.2 Our property, 29 Jeffs Drain Road, is located on the North west side of Jeffs Drain Road, near the corner of Tram Road. The site is an easy commute to the towns of Kaiapoi and Rangiora. The property is only 20km from Christchurch City. Broadly the wider area predominately consists of rural lifestyle living and with the occasional larger farming activities. Aerial photographs show numerous rural lifestyle properties between Silverstream, Ohoka and Mandeville and Swannanoa. To the north and west of the site are multiple lifestyle properties of an approximate 4-hectare size average. There are also many lots smaller than 4 hectares in the area including the adjacent property on the corner of Jeff Drains Road and Tram road and several smaller blocks at the opposite end of Jeffs Drain Road.

- 2.3 We generally support the Proposed District Plan however we consider that amendments to the Proposed District Plan would better achieve sustainable management in terms of Part 2 of the Resource Management Act.
- 2.4 We support the proposed rezoning of 29 Jeffs Drain Road to Rural Lifestyle Zone (RLZ) as the existing activities being undertaken and subsequent nature and character of the surrounding area is consistent with the RLZ zone description in the National Planning Standards being *Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.*
- 2.5 We oppose the RLZ zone description in the Proposed District Plan. As guided by the National Planning standard we consider the purpose of this is not to provide for primary productive activities as proposed but rather to provide for predominant rural lifestyle use while enable primary production. The ability to provide for primary production is constrained on a 4-hectare site. This is highlighted in the MRB Rural Production Advice- Rural Land Zoning which supports the Proposed District Plan. This assessment states:
The Waimakariri District currently has a single rural land zone of 4 hectares. This has resulted in a large increase in lifestyle blocks since 2006 as Christchurch commuters were able to purchase lifestyle properties at comparable values to a house in town. Unfortunately, these properties replaced productive farmland and with a general lack of expertise and scale, production off these properties is generally sub-optimal. Also, a large proportion of the land area is used for domestic purposes including housing, sheds, horse grazing etc.
- 2.6 While 4-hectare lot size has limited productive use it also is in excess of what is deemed suitable for a residential lifestyle within a rural environment. The MRB report also acknowledges that many lifestyle owners have limited agricultural knowledge with regards to simple crop husbandry, irrigation, grazing management, regulations etc. As small farm sizes increase, the standard of operator knowledge needs to increase or there is a need to employ outside expertise. It is considered that a smaller lot size would better meet the reasonable demand/need for rural lifestyle living in the District.
- 2.7 A review of other Proposed District Plans being prepared under the National Planning Standard has found that the minimum lots size for the RLZ is often much less than 4 hectares proposed as illustrated in the table below:

| District Plan | RLZ Minimum Lot Size |
|---------------------------------|--|
| New Plymouth District Plan | <ul style="list-style-type: none"> no more than four proposed allotments being created have a lot size of less than 1 ha in area; and every allotment has a minimum lot size of 4,000m²; and for each allotment that has a lot size between 4,000m² and 1 ha in area, a corresponding allotment of over 1 ha in area is provided; |
| Manawatu District Plan | Minimum Site Size – 5000m ² Maximum Site Size – 1 hectare |
| Queenstown Lakes District Plan | One hectare providing the average lot size is not less than 2 hectares. |
| Thames Coromandel District Plan | 2 hectares minimum net lot area. |

- 2.8 For the above reasons we oppose the reference to a minimum lot size of 4 hectares in the policies, rules and standards and considered a minimum lot size of 1 hectare to be appropriate for those areas zoned RLZ.
- 2.9 We generally support the natural hazard chapter however I have some concerns regarding the Flood Assessment Certificate potentially being inaccurate. Is the Flood Assessment based on LIDAR data or ground survey? For accuracy it is recommended that ground survey is utilised. Would Council's Flood Assessment Certificate be peer reviewed and how can the findings in the Flood Assessment be challenged?

3. I seek the following decision from the Council:

- 3.1 The RLZ zone is retained for 29 Jeffs Drain Road, Ohoka and the subsequent parcels created by LT Plan.

AND

- 3.2 The zone description and subsequent objectives and policies are amended to recognise the predominant use for rural lifestyle living activities and the role, function and predominant character and amenity of the zone is not compromised by incompatible activities.

AND

3.3 Reduce the minimum lot size within the RLZ to 1 hectare.

AND

3.4 Ensure the Flood Assessment Certificate is as accurate as practically possible.

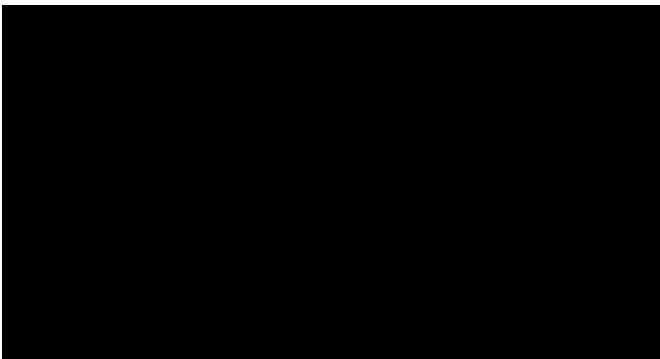
AND/OR

3.5 Any such further or other relief as may be necessary to address the issues or concerns outlined above.

4. Along with other submitters having like concerns who wish to be heard and make submissions that encompass the same issues, we would consider joining in to present a case together with them at any hearing.

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Signed

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Dated



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