

Wairau/Awatere Resource Management Plan

Plan Change 67 – Blenheim Growth Area Four

**Summary of Submissions received by Marlborough District
Council**

November 2013

Submission Summary - Wairau/Awatere Resource Management Plan - Plan Change 67 - Urban Growth Area Four - By Name

Gary John Barnett - Submitter #: 1

Submission Point: 01 - Whole Plan Change

Submission: Objects to the Plan Change.

Does not think the Plan Change addresses the issue of affordable housing.

Concerned about the loss of fertile land for food production.

Considers the Plan Change needless for such a large area.

Concerned the Plan Change will create reverse sensitivity issue for existing and future rural users.

Relief sought: Wants Marlborough District Council to actively encourage development of multi-storey apartment type housing (3-4 levels only).

Marlborough District Council should withdraw the Plan Change and concentrate new subdivision to Renwick where stoney land is available with ample space for recreation.

Roger William Beardsworth - Submitter #: 2

Submission Point: 01 - Whole Plan Change

Submission: No development should be allowed on high quality soils.

Relief sought: Reject the Plan Change.

Jill Bunting - Submitter #: 3

Submission Point: 01 - Whole Plan Change

Submission: Supports the Plan Change.

The Plan Change will zone the land to what it is already being used for - residential development.

Relief sought: That the Plan Change be accepted.

J Bush and Sons Limited (Murray Bush) - Submitter #: 4

Submission Point: 01 - Whole Plan Change

Submission: The submitter's business is located at 168 Old Renwick Road, Blenheim.

The business is beekeeping and honey making. They also operate a bee breeding program at the rear of the property.

The property is situated within the Plan Change 65 area and is close to the Plan Change 67

area.

Concerned the new Western Growth Strategy will have a major detrimental effect on allowing the business to continue operating within a new urban residential environment.

Beekeeping is currently a permitted activity, however the quantity of bees kept on the site exceed normally accepted levels within residential developments.

The company has operated in the rural environment for 96 years and has existing use rights under the Resource Management Act.

Submitter is concerned that if rezoning goes ahead, the company may need to shift sites, which would degrade the company's ability to continue its Varroa tolerance breeding programme, which is enhanced by the existing isolated nature of the property.

The business's operations have a wider ecological benefit to Blenheim and New Zealand as a whole, in helping sustain the bee population.

Concerned the existing use rights of the company will be threatened by legal action from Marlborough District Council or a housing developer's intention to develop sites nearby for residential growth.

Relief sought: If rezoning goes ahead in Plan Change Area 65 and Plan Change Area 67 then provision needs to be made in the District Plan so that existing rights including the keeping of up to 70 bees for breeding purposes.

Requests that the proposed changes for Areas 65 and 67 recognise for the continuation of the submitter's business and these are written into the Wairau/Awatere Resource Management Plan

Alistair Murdoch Campbell - Submitter #: 5

Submission Point: 01 - Whole Plan Change

Submission: Opposed in full as the Marlborough District cannot afford to have highly productive areas urbanised.

Old Renwick Road provides excellent boundary between urban and rural activities.

Relief sought: That Blenheim be developed on the poorer soils to the south of its present boundaries.

Maurice Douglas Cresswell - Submitter #: 6

Submission Point: 01 - Whole Plan Change

Submission: Does not support the Plan Change due to the use of productive horticultural land for housing.

Does not wish to be "rated off" their property.

Relief sought: None specified but assumed that they seek the proposed Plan Change to be rejected.

Deluxe Properties Limited (Greg Smith) - Submitter #: 7

Submission Point: 01 - Whole Plan Change

Submission: Fully supports the re-zoning of land for future residential growth.

It is important to have land available and zoned for residential development ten years in advance of demand. This will ensure that a lid is kept on the cost of this land for the potential

consumer.

There is a shortage of quality sections in areas other than Taylor Pass Road. The building sector will suffer while waiting for new development to proceed.

Developing on fertile land means people are able to grow gardens and vegetable, contributing to tranquillity and self-sufficiency.

It is important that smaller intimate areas with cul-de-sacs are also developed, as well as main grid roading systems.

Consultation with property owners is required to make sure existing privately owned stormwater ditches are best utilised for the likes of road reserves/berms and are carefully planned, and also so that existing right of ways do not become obsolete.

Relief sought: A speedy process so that the building sector does not suffer from lack of available sections to build on.

Alasdair Drew - Submitter #: 8

Submission Point: 01 - Whole Plan Change

Submission: Disagree with proposal to grow Blenheim to the north and west (Areas 64 to 69) as it will be over fertile productive land.

Growth should be to the south west on poorer soils.

Relief sought: Blenheim's expansion should be to the south west on poorer soils.

John Terence Ford - Submitter #: 9

Submission Point: 01 - Whole Plan Change

Submission: Opposes the Plan Changes

The proposed areas are too valuable for food production to be lost to residential development

The proposed areas are susceptible to liquefaction. Building domestic houses on the most stable ground makes sense.

Knowledge gained from the Christchurch earthquakes in respect of liquefaction must be considered. Liquefaction could be reduced if building codes require ground compaction, deep piling and wooden construction.

The future need for food is greater than the present need for cheap, individual housing.

Relief sought: The Plan Change is rejected in full.

Andrew Leigh & Vicki Maree Gifford - Submitter #: 10

Submission Point: 01 - Whole Plan Change

Submission: Opposed in full to Area 4 under Plan Change 67.

The submitter's land is a rural property at the end of Blicks Lane, which is part of Area 4, and has been planted in grapes since the 1970's.

The large rural blocks in the subject area are currently used for grape productions and grazing. The proposed urban growth expansion onto this land would compromise their

productive use.

Blicks Lane is the only access to the submitter's vineyard and is utilised by farm machinery regularly during the day and night. This is likely to create reverse sensitivity issues if the character of the road changes to service residential areas. This farm machinery traffic also raises potential safety concerns for other road users, and the submitter is concerned about the continued viability of access for farm machinery/harvesters if the street is used by residential traffic.

Land south west of Blenheim towards Benmorven and Fairhall, which is of lesser quality and already subject to residential development, would be more preferable areas for development.

The submitter is concerned about reverse sensitivity issues that may arise for their property at the end of Blicks Lane. The existing rural activities may create tensions with future residential neighbours.

The geotechnical report attached to the Plan Change highlights the risk associated with developing close to known fault lines. The submitter is concerned that the proposed development area is close to the Wairau Fault line.

Relief sought: Complete removal of proposed Plan Change 67 from the suite of proposals.

Maxwell Logan Gifford - Submitter #: 11

Submission Point: 01 - Whole Plan Change

Submission: Strongly opposed to the loss of productive land and versatile soils.

There are better and more appropriate sites to build on, such as Burleigh or Renwick.

Suggests Omaka Airport be relocated and the site used for development

Relief sought: The Plan Change is rejected.

Find other sites to develop.

Listen to locals instead of Auckland advisors.

K E Hale & D J Ballagh () - Submitter #: 12

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the Plan Change for a change of land use for Blicks Lane.

Relief sought: No change to the Blicks Lane area.

Gavin Watson & Rosalie Nanette Hale - Submitter #: 13

Submission Point: 01 - Whole Plan Change

Submission: The proposed rezoning is a wasted use of the most fertile land in Marlborough.

The proposal will ruin the attractive rural atmosphere of Blicks Lane.

Blicks Lane has a strong community feel currently, balanced between young and old, and all residents use the land productively and look after it for future generations.

The submitter is concerned that a large earthquake would cause liquefaction problems in the

area, as the Wairau fault line is 500m from Blicks Lane.

Relief sought: Maintain Blicks Lane as it is.

Paul Ham - Submitter #: 14

Submission Point: 01 - Whole Plan Change

Submission: Oppose the Plan Change in its entirety.

The Plan Change provides for urban sprawl onto highly productive land, which should be preserved for food production.

The land subject to the urban growth proposal is subject to high water table, making it more expensive to develop for residential purposes.

The proposed growth area is very close to the Wairau fault line, making the probability and consequences of serious damage in the event of an earthquake high.

Relief sought: Leave the land in its current form and use.

Tom Harrison - Submitter #: 15

Submission Point: 01 - Whole Plan Change

Submission: Much public concern has been raised over the proposed residential development of highly productive land to the north and west of Blenheim.

There are other options available for urban expansion, including the lower Wither Hills and Taylor Pass.

The costs of the infrastructure upgrades for the proposed urban growth areas will be a burden on ratepayers.

Productive land must be retained for rural purposes and for the needs of future generations.

Relief sought: No specific relief requested but inferred that the Plan Change should be rejected.

Anthony John Hawke - Submitter #: 16

Submission Point: 01 - Whole Plan Change

Submission: Supports the proposal to create additional areas for residential development.

Wants certainty that the rating status of the land will not change until development occurs on individual properties rather than when development starts in a specific Plan Change area.

Urban design recommendations - thinks Council is hypocritical in recommending private subdividers avoid creating rear allotments, whilst Council's subdivision at Forest Park has allowed the on-going development of large rear allotments.

Appendix 6: Concerned land owners will be required to construct wider road carriageways without compensation for the additional road costs.

Appendix 6: Concerned no formal consultation will be undertaken with potentially affected land owners.

Relief sought: Confirmation from Council that the rating status will not change until development on individual properties occurs and not when development starts in a specific Plan Change area.

Formal consultation requested for potentially affected land owners associated with the plans contained in Appendix 6.

Requests Appendix 6 be withdrawn and a more complete and thorough assessment be made available for submissions.

Peter Graham & Maryanne Therese James - Submitter #: 17

Submission Point: 01 - Whole Plan Change

Submission: Supports Council rezoning land to allow for future Urban Residential Development.

Wants confirmation from Council that the rating status will not change for individual properties until development occurs on the section, rather than when development starts in a development area.

Plan Change 68, page 26:

-The description of adjoining land to this area is not strictly correct, as part of the land on the southern side of Old Renwick Road is the Racecourse, which has Rural 3 zoning.

-Leaving an "island" of Rural 3 land between Old Renwick Road and the newly zoned Residential 2 land will limit the use of the rural land and threaten its current use which is viticulture.

Appendix 4:

-Questions the consistency of Council's 200m buffer from Casey's Creek for liquefaction and the zoning of residential areas.

-Liquefaction testing appears to be incomplete and inconsistent and the submitter disputes the findings, and intends to carry out additional testing to identify land suitable for residential development.

Appendix 5:

-Alternative options to grid roading patterns such a cul de sacs should be made available to developers.

Appendix 6:

-Concerned that consultation with land owners may be overlooked in the development of the "accepted services plan".

-Concerned that landowners will be required to construct wider roads based on the function of the road, according to the "accepted services plan"

-Concerned that the proposed piping of Casey's Creek will undo the restoration and beautification work done in the creek environment.

Relief sought: Confirmation from Council that the rating status will not change until development on individual properties occurs and not when development starts in a specific Plan Change area.

The "island" of Rural 3 land between Old Renwick Road and the newly zoned Residential 2 land be zoned "large lot residential" with a minimum allotment area of 3,000m², and defer Residential 2 zoning until more land stability tests have been undertaken.

That additional testing is undertaken in the areas shown to have potential for lateral spread so that a reasoned decision can be made as to an acceptable distance from Casey's Creek where residential development can take place.

Supply more information within Appendix 6 and conduct public consultation on the content.

H E F & C M T Jones (Angela Jones) - Submitter #: 18

Submission Point: 01 - Whole Plan Change

Submission: The submitter's property is included in Council Property numbers 255317; 186909; 255918. It is described as Lots 1 and 2 DP 321132, and shown in Plan Change Area 66.

The submitter supports the proposed Plan Change subject to relief sought

Relief sought: Council to approve the Plan Change subject to no residential rating being imposed on the submitter's property until the land is developed for residential subdivision.

Kapiti Views Trust (Murray Hunt) - Submitter #: 19

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the development of land north of Blenheim as it is an inappropriate use of land. The land is highly productive and a versatile resource.

The rezoning will have reverse sensitivity effects which will restrict existing lawful rural activities.

Rezoning is not efficient, and will not give effect to the Council's duties under the Resource Management Act.

The risks associated with the use of this land for residential activity are too high to permit the development to go ahead without properly investigating, eliminating, avoiding or mitigating those risks.

The economic costs associated with the use and costs to develop the land, in terms of opportunity cost, do not support changing the land use to residential.

The evaluation of alternatives is incomplete and inadequate. The evaluation should have focussed on land that is less productive.

The Plan Change will not be able to deliver new residential land in a timely or cost effective manner to meet demand, due to fragmented ownership, lack of infrastructure, and the cost of upgrading the infrastructure.

The servicing constraints and geotechnical risks will create affordability issues.

It is highly likely the developed sections will be tagged with consent notices identifying the risks of liquefaction - impacting on insurance and costs.

No mitigation measures are proposed for the loss of productive land.

The loss of productive land is a resource management issue for the region.

No measures are proposed to address potential reverse sensitivity effects in the urban-rural interface.

The urban expansion will probably lead to urban creep into the residential land, leading to further loss of productive land.

Agree there is an urgent need for new land for residential growth.

Land to the west, south-west and west of Blenheim on less versatile soils is more available at a lower cost per section to develop.

The Plan Changes fail to achieve the integrated management of the effects of use, development or protection of land and the associated natural and physical resources of the

District, as required by section 31 of the Resource Management Act.

The Plan Changes will not assist the Council to carry out its statutory functions.

Relief sought: The Plan Change is rejected in full or put on hold pending a wider District Plan review.

Properly investigate alternatives such as land to the south, west and south-west of Blenheim.

Recognise and support sustainable solutions to the problem of a shortage of residential land.

Consequential amendments to the objectives, policies and rules of the District Plan to address the matters raised in this submission.

Kenneth Olender Lawrence - Submitter #: 20

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the Plan Change

Opposed to the use of fertile farmland for purposes other than farming.

Relief sought: That development occurs to the east following on from the Witherlea foothills.

Murray Ian and Carol Margaret Locke - Submitter #: 21

Submission Point: 01 - Whole Plan Change

Submission: Wants certainty that the rating status of the land will not change until development occurs on individual properties rather than when development starts in a specific Plan Change area.

Plan Change 68, page 26: Leaving an "island" of Rural 3 land between Old Renwick Road and the newly zoned Residential 2 land will limit the use of the rural land and threaten its current use which is viticulture.

Plan Change 71: Page 48 of the Plan Change weighs up the benefit / costs to implement Policy 1.8 which states "developer to comply with specified layouts which may not be the most economic for individual developers". Questions whether compensation will be paid where a developer is not getting full potential use of a road through their property because of the indicative roading layout.

Appendix 4:

-Questions the consistency of Council's 200m buffer from Casey's Creek for liquefaction and the zoning of residential areas.

-Liquefaction testing appears to be incomplete and inconsistent and the submitter disputes the findings, and intends to carry out additional testing to identify land suitable for residential development.

Appendix 5:

-Alternative options to grid roading patterns such as cul de sacs should be made available to developers.

Appendix 6:

-Concerned that consultation with land owners may be overlooked in the development of the "accepted services plan".

-Concerned that landowners will be required to construct wider roads based on the function of the road, according to the "accepted services plan".

-Concerned that the proposed piping of Casey's Creek will undo the restoration and beautification work done in the creek environment.

Relief sought: Confirmation from Council that the rating status will not change until development on individual properties occurs and not when development starts in a specific Plan Change area.

The "island" of Rural 3 land between Old Renwick Road and the newly zoned Residential 2 land be zoned "large lot residential" with a minimum allotment area of 3,000m², and defer Residential 2 zoning until more land stability tests have been undertaken. That additional testing be undertaken in the areas shown to have potential for lateral spread so that a reasoned decision can be made as to an acceptable distance from Casey's Creek where residential development can take place.

Supply more information within Appendix 6 and conduct public consultation on the content

Alison Mackenzie - Submitter #: 22

Submission Point: 01 - Whole Plan Change

Submission: High quality land is of limited supply in Marlborough and should be protected.

Proposed development will cause loss of fertile productive land.

Relief sought: Blenheim's expansion should be on less fertile land.

Marlborough Province of Federated Farmers of NZ (Michael Bennett) - Submitter #: 23

Submission Point: 01 - Whole Plan Change

Submission: Support the efforts of Marlborough District Council to achieve sustainable urban growth in and around Blenheim.

Concerned over the loss of highly productive land to production arising from the proposed Plan Changes.

While liquefaction is a risk in many places, it is unlikely that the risk of land damage will be so severe as to make development into housing unrealistic or impractical except in extreme cases.

The evidence presented does not support the proposition that the areas to the east of Blenheim are entirely unsuitable for urban development and that there is no choice but to expand onto areas of highly productive land to the west of town.

Placement of new urban areas will not prevent all reverse sensitivity effects and other options should also be considered, including 'non nuisance complaint' covenants for new residential subdivision near areas used for primary production activities, including future activities.

Excessive focus on preventing reverse sensitivity effects can also distort decision making and direct land development to areas that are less appropriate for urban development.

Relief sought: Allow some urban development on areas prone to liquefaction to the east or south-east of Blenheim, subject to suitable standards of geotechnical testing, and if necessary, land remediation, and higher standards of construction.

Provide for on-going review of the acceptance framework for land development based on the Royal Commission report and other information available.

Recognise that placement and design of subdivision is not the only mechanism to address reverse sensitivity effects and that other options are also available.

Include mechanisms such as covenants on sections allocated near production land to prevent highly productive land being compromised.

Have regard to the current and future values of highly productive land to current and future generations, both within and outside Marlborough.

Adopt a balanced approach to future development and make provisions for urban growth on

land subject to liquefaction risks or reverse sensitivity, hilly land to the south of Blenheim, and productive land.

Evaluate alternative options to concentrating all urban growth on productive land.

John Ernest Marris - Submitter #: 24

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the planned rezoning of areas identified as Urban Residential 2.

The land is of too high a versatility for food production to be lost to residential development.

The cost to turn the land into residential is higher than in other locations to the west, north-west, south-west and south of Blenheim.

The proposed area has a high water table and is susceptible to flooding.

The geotechnical evaluation contained in the Blenheim Urban Growth Study Report shows that it would be more sustainable to develop areas to a lower level of hazard, such as the alluvial gravel plains of west Blenheim.

Relief sought: The Plan Change is rejected in full.

Ralph Mason - Submitter #: 25

Submission Point: 01 - Whole Plan Change

Submission: Oppose the proposal to expand Blenheim to the north and west onto highly productive soil.

The proposal is not in line with good town planning principles.

Marlborough's productive land needs to be safeguarded for present and future production.

Better options are available to the south and west of Blenheim.

Relief sought: No specific relief requested but inferred that Plan Change should be rejected.

Kevin & Lynda Morgan - Submitter #: 26

Submission Point: 01 - Whole Plan Change

Submission: The submitters are land owners on Old Renwick Road.

Inadequate consultation has been undertaken concerning the planned roading and infrastructure.

Does not agree with proposed roading near Waipuna Street as it affects land owned by the submitter.

The loss of the highly productive land is a serious resource management issue.

The lack of specific measures to deal with reverse sensitivity issues is a major shortcoming of the plan changes.

A combination of setbacks, buffers, reduced density of dwellings and other methods in the new zones should be used to preserve existing rural uses.

The likely impacts of reverse sensitivity will be greater than those assessed in the Plan Change, and there is a real risk of incremental creep.

Relief sought: The Plan Change is rejected in full, or

Defer the rezoning until the infrastructure and hazards issues are resolved so that there is confidence the land will be used effectively and efficiently for residential development, or

Utilise 'Deferred Zoning' to ensure orderly and efficient development of the areas in the Plan Changes, or

Identify and provide for methods to be adopted to minimise or eliminate the risk of reverse sensitivity with adjoining rural land and activities.

Identify and provide methods to avoid incremental creep of residential activity onto adjoining land by way of better defined boundaries of lower density at the urban/rural interface.

Any consequential amendments necessary give effect to the points raised in this submission.

New Zealand Institute of Surveyors (Vicki Nalder) - Submitter #: 27

Submission Point: 01 - Whole Plan Change

Submission: Support the rezoning of land to allow for future urban residential development.

Sequencing the development of areas based on the cost of effectiveness for the servicing - The submitter questions what will trigger the necessary upgrades and who will pay initially for the upgrades.

Requests the "Accepted Services Plan" be confirmed and provided so that individual land owners can see where services are proposed to be located etc. The submitter questions how land owners be compensated

The submitter also questions how Council will coordinate the servicing.

Need to ensure that the Plan Change has not priced itself out of the Blenheim market before it begins.

The submitter agrees with the need for an overall strategy for the roading layout. However, the submitter hopes that the Council will exercise some discretion in the final locations given that there are a small number of landowners in the Plan Change area and therefore more practical or suitable alternative may be required

Relief sought: The workability and Practicality of the "Accepted Services layout Plan" needs to be considered from a commercial aspect, and be available to the Public for comment.

Ensure that Council officers are willing to apply some discretion for the location of the roading layout based on practicality and serviceability.

NZ Transport Agency (Teresa Minogue) - Submitter #: 28

Submission Point: 01 - Whole Plan Change

Submission: Supports the Plan Changes in part.

Concerned about the intersection improvements recommended by GHD Limited for State Highway 6 (SH6) to accommodate the proposed urban growth in northern Blenheim. No justification is provided for the recommendations, and the improvements could compromise the through function of SH6. Would prefer to see network optimisation take place rather than add additional capacity.

There is no guarantee the Transport Agency will fund the SH6 improvements.

SH6 is a designated limited access road, which stops numerous accesses being created alongside roads subject to development pressure. Unless there are significant benefits to the land transport network, the Transport Agency would not support any additional at grade connections to SH6.

Relief sought: That further information is provided by Council to justify the need for the recommended improvements to SH6 for Transport Agency review.

Council should expect developers to pay their fair share towards the new infrastructure and roading upgrades.

The indicative local road running parallel to SH6 is deleted due to the potential adverse effects from light glare.

The indicative roading connection to SH6 is removed.

Network optimization take place ahead of any proposed roading improvements where applicable.

Tony Orman - Submitter #: 29

Submission Point: 01 - Whole Plan Change

Submission: Oppose the proposed residential development of highly productive land to the north and west of Blenheim.

Proposal is against the fundamental principles of sound town planning.

Use of flat land requires pumping stations thus adding to housing cost.

The Plains are not large and Marlborough needs to make full production use (food production, commercial production) of the fertile soils to give Marlborough some degree of self-sufficiency given that civil and international disorder could result in food shortages in the future.

Submitter states they find it incredible that Marlborough District Council have paid ratepayers' money to Auckland-based consultants for flawed advice.

Relief sought: Expand Blenheim to the south and west where soils are less fertile and contours give gradients for infrastructure.

David Leslie Price - Submitter #: 30

Submission Point: 01 - Whole Plan Change

Submission: Considers the statement that the soil of the proposed growth areas has already been compromised is a generalisation. Contends that the future use of the soils has not been compromised, as much of the area in question is currently in productive use. Also contends that the fact that much of Blenheim has already been developed on high quality soil does not justify further development on high quality soils.

There is no pragmatic application of the objectives and policies to "maintain or enhance the life supporting capacities of the versatile soils in Rural 3 Zone".

Wants Council to reconsider the proposed use of the versatile soils and the lack of protection given them

Rezoning the productive land for residential use will place a rating burden on existing farming properties and their operations will become economically unviable. If Council goes ahead with

rezoning, a solution should be presented by Council to the affected property owners for the rating problem.

Opposed to the Plan Change as it has the potential to cause reverse sensitivity issues. Concerned that if a large number of residential properties were developed near the Bushes Honey operation on Old Renwick Rd, the operation would be forced to change due to tensions between parties.

Opposed to the Plan Change as it will cause a loss of rural amenity over time.

Relief sought: The Plan Change is rejected.

Council puts forward a new proposal that offers an acceptable balance of options for negatively affected parties through consultation. Wants Council to offer some form of protection to existing rural businesses and activities to safeguard their future operations. Notes Colonial Vineyards' application for rezoning was rejected due to potential reverse sensitivity effects on existing nearby businesses.

Myra Grace Sandall - Submitter #: 31

Submission Point: 01 - Whole Plan Change

Submission: Opposes the Plan Change and the proposed use of fertile land for residential purposes.

Rezoning the land beside Blicks Lane will subject the remaining rural land to reverse sensitivity issue.

The report on the sustainability of this land for rezoning the Blicks Lane land is incorrect - check the fault lines.

Relief sought: Further investigation need to be done to find land more suitable for rezoning.

Katherine Julie Saville-Smith - Submitter #: 32

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the Plan Change.

Opposed on the basis of the negative impacts associated with urban sprawl, including the irreparable compromise of ground and surface water, the reduction in available habitat, the degradation of air, soil, visual amenity and landscape, and the increased risk and costs to manage the impacts of stormwater, river management, water supply and sewerage systems.

The accumulation of effects associated with all the Plan Changes will lead to urban sprawl and land use inefficiency.

Rezoned land that is not developed and utilised immediately will degrade.

Population growth patterns in Marlborough and Blenheim do not justify the proposed expansion of urban land.

The proposed urban expansion will not reduce residential land prices and will increase travel distances and costs, as well as rates to fund infrastructure upgrades.

No evidence or mechanisms are proposed to promote and deliver environmentally sustainable housing or affordable housing

Relief sought: The Plan Change is rejected in full.

Clyde & Helen Sowman - Submitter #: 33

Submission Point: 01 - Whole Plan Change

Submission: Submission relates particularly to the proposed rezoning division down Blicks Lane, where the submitter lives.

Opposes the rezoning of the east side of Blicks Lane from rural to residential.

The submitter owns the vineyard on the west side of the proposed development, and is concerned the proposal will threaten their right to farm due to the increased potential for reverse sensitivity issues.

Blicks Lane is unsuitable for the proposed subdivision for the following reasons:

- e heavy farm machinery traffic that uses Blicks Lane, which is particularly heavy around harvest season every February to May.
- The vineyards use bird scaring devices such as gas guns, motorbike horns and high pitched audio bird repellents from November to January, and January to May.
- Frost prevention is undertaken in the early hours of the morning from August to November, which generates high levels of noise disturbance.
- Grape spraying is conducted throughout the year, which is typically a contentious issue between rural and residential land uses.

The submitter is concerned that the rezoning will undermine their long term commitment and enjoyment of the rural location and nature of their property.

The submitter feels it is inappropriate that residential rezoning could be consented when the proposed development borders intensive horticultural land use.

Other more suitable areas for the proposed rezoning were considered and rejected by Council due to their liquefaction risk. However, the land area for this proposed rezoning is only 500m south from the Wairau fault line, making the area a high risk for severe earthquake damage.

Relief sought: The zoning for the Blicks Lane area remain as Rural.

Stark Family Trust (David Stark) - Submitter #: 34

Submission Point: 01 - Whole Plan Change

Submission: Submission relates to Growth Area 4 C.

Supports the growth area in the main, but requests clarification around the roading plans, services and timing.

Questions how indicative roading layouts will be finalised and how landowners will be compensated for areas required for roading.

Relief sought: Thinks there is merit in the buffer proposed by Urbanism Plus between the urban and rural zone, and would like Council to revisit this proposal for the west and north parts of Area 4. The submitter suggests that a transitional zone (possibly Rural Residential) could be considered for these areas.

David Wilson - Submitter #: 35

Submission Point: 01 - Whole Plan Change

Submission: Supports the Council re-zoning land for future urban residential development as it will provide co-ordination and avoid ad-hoc development.

Concerned about the lack of detail and insufficiency of work completed regarding how the

adverse effects of urban development on stormwater quality and quantity will be mitigated.

Appendix 6 refers to the use of retention ponds, but no reason or justification as to why these treatment systems have been chosen has been provided. Performance criteria, downstream water levels and groundwater levels need to be factored into the selection of stormwater treatment.

Relief sought: The stormwater aspects of the "Accepted Services Plan" needs to be developed in more detail to have confidence that appropriate performance levels can be obtained. The "Accepted Services Plan" should be required to meet the same level of detail expected by Council from a Private Plan Change.

The Plan Change should be put on hold until the "Accepted Service Plan" has been finalised.

Hubert Thomas (Tim) & Janet Armstrong - Submitter #: 36

Submission Point: 01 - Whole Plan Change

We have no opposition to the proposed Plan Change 67.

Wayne Robert and Christine Anne Barnett - Submitter #: 37

Submission Point: 01 - Whole Plan Change

Submission: Supported Plan Change 67 allowing for residential development for the following reasons:

There are already a number of smaller lifestyle size blocks in the area making the viability of agricultural production questionable.

A roading network is reasonably well established to cater for urban growth in this area with main roads already servicing the region. Blinks Lane has sufficient space to cater for any potential increase in traffic.

Reverse sensitivity effects between urban and rural activities will be minimised by the proposal. Blinks Lane provides an appropriate location to create a rural/urban boundary (which must exist at some location). The nature of rural activities in Blinks Lane is relatively benign; the area is frost free i.e. no frost fans, it is free of odorous activities and relatively free of noisy activities.

Relief sought: That Council ensures that there will be no rating impact after rezoning but prior to the land be subdivided.

That Council allow for land on the northern boundary of Growth Area 4 to be subdivided into large lots to create a buffer between high density residential development and rural areas. This will assist in reducing reverse sensitivity effects at the transition from Residential to Rural zones.