



**MARLBOROUGH
DISTRICT COUNCIL**

Wairau/Awatere Resource Management Plan

Plan Change 67 – Urban Growth Area Four

Submissions Received by Marlborough District Council

September 2013

Submission on Plan Change 64 -
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan



MARLBOROUGH
DISTRICT COUNCIL

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

This submission refers to plan changes 64 to 70 inclusive
Reference is to the use of versatile soils for sub-division
and housing construction

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

I object to the plan changes (64 to 70) from several points
of view.

- 1 Affordable housing - issue is not being addressed
- 2 Loss of land for future food production
- 3 The needless plan change for such a large area
- 4 Revoke sensitivity for existing and future rural uses.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

MDC should actively encourage development of multi-story
(3-4 levels only) of apartment type housing.
MDC should withdraw plan changes (64 to 70) and concentrate
new sub-division to Renwick where stoney land is
available with ample recreation areas

Continue on a separate sheet if necessary

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

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Contact Person (if applicable)

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 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

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For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

All

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

NO DEVELOPMENT ON UNDIVIDED HIGH
QUALITY SOILS

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

RESET PLAN CHANGE

Continue on a separate sheet if necessary

**Submission on Plan Change 70 -
Blenheim Growth Area Seven - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Jill Bunting			
Organisation (if applicable)				
Contact Person (if applicable)				
Postal Address	24 SEVERNE ST			
	HELVERTON			
	BLENHEIM	Post Code	7201	
Email	jillbunt@xtra.co.nz			
Telephone	Business	Home	03 5750248	
	Fax	Mobile	0274814747	
Address for Service				
(if different from above)				
		Post Code		
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	21/8/13

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

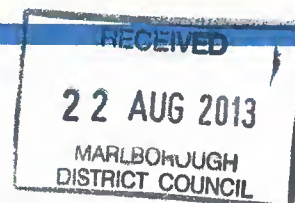
4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

All of Plan Changes 64 → 71

Specific Plan Change 70 (+71 - roading)

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

Ass attached. - Appendix 3

I support proposed Plan changes 64 - 71

I specifically support Plan Change 70 (+71)

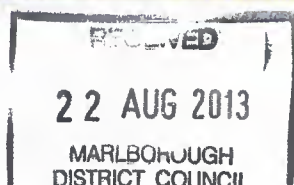
Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

That the areas proposed by way of Plan Changes 64 - 71 are rezoned from Rural B to Urban Residential 2.

That specifically the areas covered by Plan Change 70 is rezoned from Rural 3 to either large lot Residential (600m² - 800m²) or Urban Res 2 as proposed.

Continue on a separate sheet if necessary



Appendix 3

Proposed rezoning (Plan Change 70)- Details of submission Jill Bunting

I enclose:

- Appendix 1 Lots in area proposed for rezoning under Plan Change 70
- Appendix 2 (aerial of area)
- Photos of some of housing in David St and Severne St which indicates how residential it actually is and also how when an area is rurally zoned un managed development by incremental "one-off" resource consents can result in appalling design and structure to an area

This area covered by Proposed Plan Change 70 is close to Springlands shopping centre which has a café, a supermarket and comprehensive medical centre, and a Speights Ale house. It is also within easy walking distance of Springlands Kindergarten, Bunnings and Pak and Save. It has Bohally Intermediate and Marlborough Girls College within cycling/walking distance and via Lakings Rd is connected for active transport (walking and cycling) via the Taylor River pathway to Town (15mins walk away from our house) and Marlborough Boys College is accessible largely off road.

With the exception of land occupied by the Brooks Family Trusts -(Angela Johnson (daughter) in Battys Rd- 2 houses on the piece of the land she occupies- one a recycled house shifted there in the last 12 months) Susan Ramsay(daughter) in Severne St, Yuri Cohen (son)in Severne St - house is on the parent title of his father Ian Brooks- as are 3 other houses)all the land is subdivided into what is essentially residential sizes. (see appendix 1) and owned by individuals under separate titles.

There has been no commercial food production on this land in at least the past 20years-probably longer- the sheep used for grazing are essentially mowers and are not stocked in sufficient numbers due to the very small size of the blocks and proximity to neighbouring people and dogs to say that they are there as part of an economic farming venture.

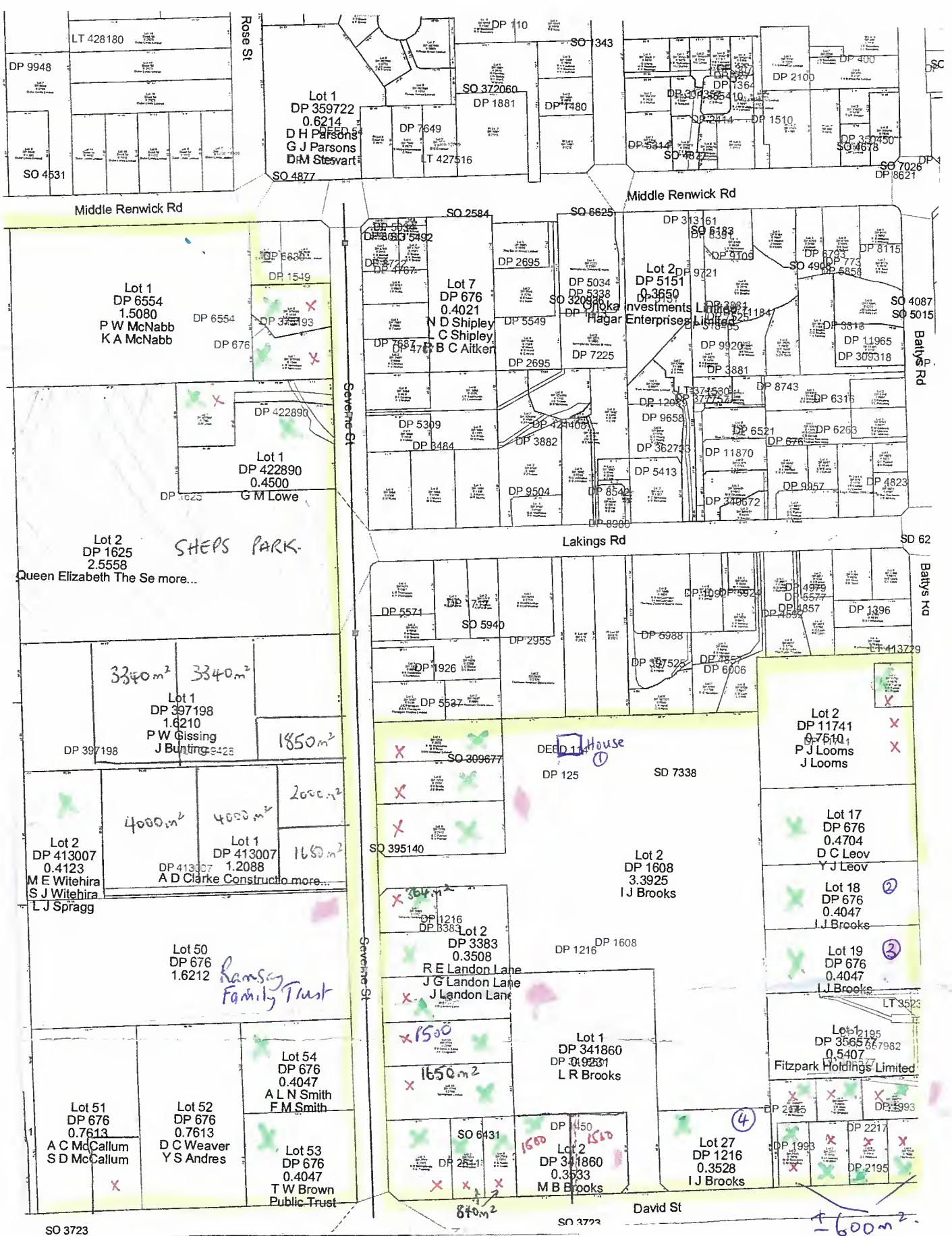
The area is serviced by town sewerage and water and has the ability to cope with stormwater due to the permeable nature of the underlying Wairau gravels- liquefaction drilling showed the gravels under the topsoil were 15m deep on our property (24 Severne St)- and the presence of streams and drains which make up part of Councils drainage systems (and which in most cases Council has easements over) already cope with the existing stormwater.

It makes very good sense to rezone this area correctly into what it already is- a residential zone close to all amenities which will also then result in better checks and balances to ensure that some of the practices that occur in this area and are not able to be prevented because of its current rural zoning (see photos of David St -1,2,3) can be better managed. It is a beautiful area and it is a pity that this rezoning was not done as recommended at the time of Variation 38 (which did not go ahead because it was election year and the panel at the time felt that some of the other provisions of Variation 38 were too controversial in an election year so against recommendation from the planners at the time threw the whole variation out.)



The rezoning of this area was extensively consulted on during the urban growth study and the recommendation from that process was that there were no show stoppers and rezoning should occur. This has been further enhanced by the test drilling that has proven that the area proposed is not subject to liquefaction and is all original ground.





Appendix 1



Lot 2 DP 10461

MIDDLE RENWICK ROAD

Lot 1 DP 304127

Lot 2 DP 304127

Lot 1 DP 6554

Lot 1 DP 422890

Lot 2 DP 1625

LAKINGS ROAD

Lot 2 DP 955

Sheps Park

Lot 1 DP 397198

SEVERNE STREET

Lot 1 DP 1216

Lot 2 DP 1216

Lot 3 DP 1216

← Yuri Cohen

Lot 2 DP 304124

Lot 1 DP 413007

Lot 2 DP 1608

Jan Brooks

Lot 1 DP 11725

Susan Ransy

Lot 50 DP 676

Lot 2 DP 3383

Lot 2 DP 318524

Lot 9 DP 1216

Brooks

Lot 10 DP 1216

Lot 1 DP 341860

Lot 54 DP 676

Lot 11 DP 1216

Lot 2 DP 341860

Lot 51 DP 676

Lot 52 DP 676

Lot 53 DP 676

Lot 1 DP 11709

DAVID STREET

Lot 1 DP 321807

Lot 58 DP 676

Lot 59 DP 676

Lot 60 DP 676

Lot 61 DP 676

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RECEIVED

22 AUG 2013

MARLBOROUGH DISTRICT COUNCIL

1:3,000



10/03/2010

Seville St Eastern side looking from western side



RECEIVED
22 AUG 2013
MARLBOROUGH
DISTRICT COUNCIL

All houses in this photo currently zoned Rural 3 - 1800 m² lots (or less) (7 houses)

①



DAVID ST - 2 houses on lot (1050 m²) "family flat" Rural 3 zoned.



DAVID ST - converted garage approx 800 m². Rural 3 zone



DAVID ST - approx 950 m² - no legal title, 2 carparks + junk



BATTY'S ROAD - 2 houses on lot "family flat" Rural 3
(older house obscured by trees to right)

RECEIVED
22 AUG 2013
H
CIL



RURAL 3 ZONED 9 Lots granted 2012. (lots from 1600m²
- 4100m²)

RECEIVED

22 AUG 2013

MARLBOROUGH
DISTRICT COUNCIL



24 SEVERNE ST - RESOURCE CONSENT FOR LARGE LOTS.

**Submission on Plan Change 65 -
Blenheim Growth Area Two - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service

(if different from above)

Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)
Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

** NOTE! OUR SUBMISSION COVERS BOTH CHANGE 65 + 67 BUT I WILL NOT NEED TO BE HEARD TWICE.*

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	MURRAY BUSH			
Organisation (if applicable)	J. BUSH + SONS LTD			
Contact Person (if applicable)	MURRAY BUSH.			
Postal Address	RD2, 168 OLD RENWICK ROAD			
	BLENHEIM			
		Post Code	7201	
Email	bushes.honey@xtra.co.nz			
Telephone	Business	03 5783923	Home	03 5778905
	Fax	5783923	Mobile	027 4036484
Address for Service				
(if different from above)	AS ABOVE.			
		Post Code		
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	15/8/13.

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496
Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

J. BUSH & SONS LTD

APIARISTS

Producers and Packers of Finest Honey and Wax since 1916.

RD2, 168 OLD RENWICK ROAD
BLenheim
NEW ZEALAND

TEL & FAX : 64 3 5783923
bushes.honey@xtra.co.nz

15th August 2013

Planning Technician
Marlborough District Council
P.O.Box 443
Blenheim 7240

Re: Blenheim Growth Rezoning to the Wairau/Awatere RMP.
This submission covers Area Two (PC65) and Area Four (PC67). Although our submission covers two areas, only one submission will be presented, and if invited, I will only require one verbal presentation.

Thank you for the opportunity to present our position with regards to the above strategy review.

We will be using this document to table our opposition to the rezoning of Area Two (Plan Change 65) and Area Four (Plan Change 67).

Our business, J.Bush and Sons Ltd, is situated at 168 Old Renwick Road, Blenheim. The MDC rating property numbers are:138042, and 138050.

Ownership of this property and the business of J.Bush and Sons are held jointly by myself and my brother Peter Bush.

Index:

*Executive summary

*Background: Business Activities and History

*Councils impact of Rezoning:

- a) Plan Change 65 and 67 Blenheim Growth Strategy.
- b) Environmental benefits- Ecosystems include Bees.
- c) Interpretation of Existing Rights

*Conclusion.

Executive Summary:

*We are concerned the new Western Growth Strategy will have a major detrimental effect on allowing our business to continue our operations within a new Urban Residential environment.

*We have operated in a rural environment for **96 years**. Under the Resource Management Act we will have “Existing Use Rights”, but there is an inconsistent set of rules developing in this area from the Marlborough District Council, that creates a high operational and financial risk to us if Urban Development is undertaken on our boundary fence.

*Precedence was recently set when the MDC refused to allow the urban development at Omaka, on the grounds potential ‘Urban complaints’ could have had an adverse affect on Omaka airfield operating. Rezoning areas Two and Four is leaving the door open to have “Urban complaints’ directed at our operation in years to come.

*The proposed Urban Development strategy puts at risk the considerable investment we have made into Research and Development for our Varroa resistance breeding program which is part of a network around NZ trying to prevent the demise of the NZ Honey Bee.

*There would be an Environmental Impact for the greater Springlands area if our “free” bees were forced to be removed as a result of proposed Urban Residential development.

Background

A) Business Activities:

The nature of our business is Beekeeping, with a number of buildings on site being used for the extensive range of activities required for this type of industry. These include, but not limited to, storage and assembly of beekeeping equipment, processing and storage of honey and other bee products, packing and processing of honey for domestic and export markets.

We also operate an extensive queen breeding program at the rear of the property, which requires up to 70 live beehives during the spring, and is now our central location for extensive R & D into studying varroa resistance in honey bee populations. Varroa is a parasitic mite that destroys bees and is a major factor into Colony Collapse Disorder (CCD) that has destroyed bee populations around the world.

The premises operate under Risk Management Programmes audited and managed under the Ministry of Primary Industries/ NZ Food Safety Authority (MPI/NZFSA) quality assurance system.

B) Business History and Developments:

*We have been operating as beekeepers on this site since 1916. After 96 years in business we are not 'fly by nighters'.

*My Grandfather Horace Bush started this business which was later sold to my father John Bush, and now passed onto the third generation. The size of our business has grown over this time, but the activities have always involved honey processing and the keeping of live bees.

*Our export program has been enhanced in recent years with R & D with other Marlborough businesses, which can only help increase Marlborough's Economic Activity.

Rezoning Impact:

a. Plan Change 65 and 67 Blenheim Growth Strategy.

*Our property is situated within **Plan Change 65** on the aerial mapping plan. Our submission will relate directly to how we see our company J.Bush and Sons Ltd fitting within the proposed growth rezone areas. Our submission also covers Area 67 because of the close proximity to our property of this Area boundary.

The desire to rezone this area focuses on the provision for residential growth, but disregards an Economic Development impact on our business that has proven resilience and other Marlborough Businesses that form a network of service entities.

*The keeping of bees in Urban Blenheim is an allowed activity, but the quantity of bees we require for our breeding program (up to 70 hives) will exceed normally acceptable levels within residential developments.

Our breeding program at 168 Old Renwick Road is of major importance, as it aims at developing Varroa tolerant bees and holds one major advantage over all of our other sites. It is situated in the middle of the Marlborough Plains so the outside influence of other bees is dramatically reduced. This provides a scientific benefit in isolating specific genetic traits. These programmes are at the heart of bee survival in NZ and compliments research currently being done in other areas of NZ. The risk to us if zoning is changed, is our bees would probably need to move with a subsequent loss of this specific program.

If re zoning is to become a reality in "Area 65 and Area 67", then a minimum condition for our acceptance would be "Existing Rights including the Keeping of up to 70 Beehives for Breeding Purposes" and have this written into the District plan for our business protection.

*We have almost a zero waste footprint and emit no smells, odours, or anything else that could upset neighbours, except at certain times of the year we do need to do a lot of work at night.

We need to move bees at night and will often load/ reload trucks in our yard. We try extremely hard to avoid too much noise, but being completely quiet is impossible and lights need to be on to allow a safe working environment.

There is not an issue with these activities under “Existing Rights” but people do complain about sheep noises after building next to a paddock full of sheep. Forcing Urban development to our boundary fence will almost certainly generate problems for us, unless protection is written into the District Plan.

b. Environmental Benefits:

*Without doubt, this submission is aimed at protecting our business, and to continue operating as beekeepers for many years to come. There is however an area of this submission that demonstrates our ability to keep live bees has an Ecological Benefit for the wider community.

*We have seen a massive decline in wild bee populations since the arrival of the Varroa Bee Mite in Marlborough in 2006, with many reports of the decline in bees within urban Blenheim.

Our bees provide a major source of “free” bees to the greater Springlands area.

*With Colony Collapse Disorder (CCD) destroying bees in massive numbers overseas, and bees in NZ now only surviving with the intervention of human help, the councils proposed changes must take into count our ability to maintain a healthy reservoir of bees.

c. Conflicting interpretation of Existing Rights within the MDC.

*Under the Resource Management Act we will have “Existing Use Rights” to continue operating our honey production/processing operation at 168 Old Renwick Road, even if zoning changes this area from “Rural 3” to “Urban Residential”.

The Resource Management Act currently gives a mandate for businesses to continue running their operations, despite District Planning changes, using “Existing Rights”. It does not however appear that these rights are universally protected. Two recent situations in Marlborough highlight the conflicting stance “Existing Rights” are being interpreted.

Recently the MDC rejected a planned Urban development at Omaka. The primary reason given was the risk of “Urban Complaints” putting pressure on the operation of the Omaka airfield. Despite Omaka airfield having “Existing Rights” to operate, the MDC could see new urban residents complaining about noise, fuel smells, and numbers of people during events. To avoid legal pressure and resident complaints, this development was rejected.

On the opposite spectrum, the Marlborough District Council has taken legal action over a boat yard in Waikawa, Picton, to have their “existing use” rights revoked, so residential development can take place in the area.

In the case of our business, despite having “Existing Rights” to operate at 168 Old Renwick Road, your proposal for Area 65 to have residential properties built on our fence line, opens us up to the same potential risk of “Urban Complaints”. Why should we be forced into an uncertain future, which might only be sorted with expensive legal action, against the MDC or a new housing developer.

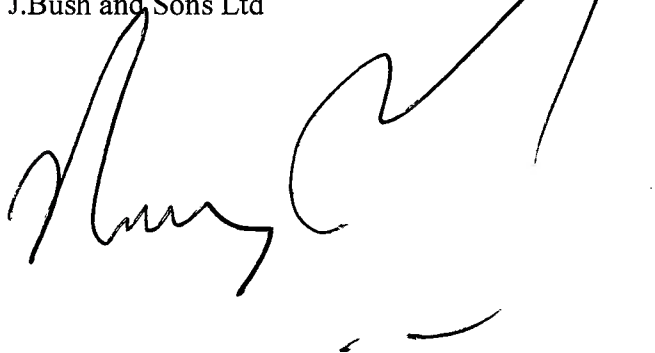
Conclusion:

It is very easy for the MDC to make a decision that might not affect us for another 20years. To the MDC planners, this time frame might be ‘miles’ away. From our point of view we have been operating for 96 years, and another 20 years is nothing. We have recently introduced machinery into our business that has a longer operation life than that. We have invested a lot of time and capital into our business, and this needs to be protected for our future generations and for the health and stability of bees in urban Marlborough.

We request that if the proposed changes for Areas 65 and 67 are implemented, then recognition for the continuation of our business is written into the new Wairau/Awatere Resource Management Plan.

The currant slogan is “Smart Business Marlborough”. While acknowledging new business to the district is vital, we request that existing businesses such as ours are given the protection we deserve within any development plans.

Yours Sincerely
Murray Bush
J.Bush and Sons Ltd

A large, stylized handwritten signature in black ink, appearing to read 'Murray Bush', is written over the typed name and extends upwards towards the text above.

64-69

**Submission on Plan Change 68~~5~~
Blenheim Growth Area Five - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

Post Code

Email

Telephone Business Home

Fax Mobile

Address for Service

(if different from above)

Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

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Could you gain an advantage in trade competition in making this submission? Yes No

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3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496
Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

Plan Changes: 64, 65, 66, 67, 68, 69

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

Opposed in full on the grounds the Marlborough district and its future economy can ill afford to see these highly productive areas of land swallowed by urbanisation. Particular change 68 because of its high water table.
The Old Renwick Road provides an excellent boundary between urban and rural activities.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

That it review its decision and develop the Blenheim city on the poorer soil types to the south of its present boundaries.

Continue on a separate sheet if necessary

30 August 2013



Marlborough District Council
PO Box 443
Blenheim 7240
Attn: Planning Technician

P O Box 343, Nelson 7040
Phone: 03 539 0330
Mobile: 027 244 3388
Email: mark@landmarklile.co.nz
www.landmarklile.co.nz

Dear Sir/Madam,

Submission on Plan Change 64-71 (Wairau/Awatere Resource Management Plan)
Colonial Vineyard Limited

Please find attached a submission from Colonial Vineyard Limited (CVL) on Plan Changes 64-71.

While CVL strongly supports the provision of new urban land to accommodate residential growth, it opposes Plan Changes 64-71. The reasons for this opposition and the decisions sought are set out in the attached submissions.

CVL seeks to be heard in support of this submission.

Please contact me if you have any queries.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Mark Lile".

Mark Lile
Landmark Lile Limited
Resource Management Consultancy

cc. Colonial Vineyard Limited
C/- Hardy-Jones Clark
PO Box 646
Blenheim

Form 5


Submission on Proposed Plan Changes 64 to 71
(Wairau/Awatere Resource Management Plan)

Clause 6 of the First Schedule, Resource Management Act 1991

To: Planning Technician
Marlborough District Council
PO Box 443
Blenheim7240

Name of Submitter: **Colonial Vineyard Limited**

Representative / Contact: Landmark Lile Limited
PO Box 343
Nelson
Attn: Mark Lile (Resource Management Consultant)


Signature of authorised person 30 August 2013

Part A: Plan Change 64-71

Reasons for these submissions

CVL opposes Plan Changes 64-71 for the reasons and explains the reasons for this opposition under the following headings and subheadings:

1. **Suitability** of Areas 1-7, having regard to **adverse effects and constraints** caused by:
 - a. Risks from liquefaction;
 - b. Servicing constraints;
 - c. Loss of highly productive soils;
 - d. Adverse reverse sensitivity effects;
 - e. Transmission lines;
 - f. Ecological effects / natural values.
2. The **appropriateness** of the policy, rules and methods given the significant resource management issues / risks arising;
3. The inability to deliver affordable residential allotments in a timely manner i.e the **effectiveness, efficiency, benefits and costs** of the policy, rules and methods;
4. The **inconsistency of the Plan Change with the "assessment principles"** promoted in the urban growth strategy;
5. The **inadequacy of the Section 32**.
6. **Part 2** of the Act.

1(a). Risks of Liquefaction

The geotechnical reports supporting the Plan Change Request (Appendices 2 and 4) confirm that there is potential liquefaction in some of the growth areas. The Plan Change states that this risk is not significant enough to preclude development. The methods proposed to mitigate the risks is to require specific foundation design for buildings (Change 71).

The section 32 report states that the risk for each of Area 1 to 7 is "low". However in terms of Growth Area 5 (PC68) states that "a setback is provided from the existing drain that runs along the northern side of Old Renwick Road because of lateral spread" (p28). This same drain (Caseys Creek) also extends through the middle of Areas 1, 2 and 4. It is submitted that this drain (and associated groundwater and ground conditions) present a significant risk to residential development of these areas. These risks have been understated in the Section 32 report as "low" when in fact the geotechnical reports supporting the Plan Change collectively send a very different message:

- "The Dillans Point Farmation soils are highly vulnerable to liquefaction ..." (AP2, p1);
- "The risk of lateral spreading is lower in areas Na:Nb and SE, however there is still potential for lateral spreading towards drainage channels that cross these sites" (AP2, p1);
- "Ground improvement and robust deep foundations to mitigate the risk of liquefaction and lateral spreading are very costly. ... these very costly methods are likely to lead to prohibitively high development costs. In this regard we also note the government's decision not to allow redevelopment of (red zone) residential areas in Christchurch that were subject to liquefaction or lateral spreading, rather than carry out very costly ground improvement to mitigate against future liquefaction". (AP2, p1);
- "From a sustainability perspective, it would not be prudent to encourage development on land which will require considerable costs and consume substantially more resources compared to development in land which is more stable in earthquake and other hazards. This is on the basis that it would be more sustainable to develop areas subject to a lower level of hazard, such as the alluvial plains to the west of Blenheim" (AP2, p1) (see Figure 2A, dated Feb 2013, Appendix 4 of the Plan Change);
- For Area Na:Nb "Analysis showed the shallow silty sand layer above the gravels as liquefiable for all return period events considered" and "The Potential for liquefaction ... will be strongly influenced by the ground water table" (AP2, p9)
- "Liquefaction in this area may lead to lateral spreading of the land towards nearby streams and drains although the effects are likely to be limited given the relatively thin deposits of liquefiable material, except close to the southeast boundary with thicker deposits and northeast boundary, close to the river" (AP2, p11);
- Lateral spreading is likely to be a significant issue in Area 6 (now Area 7 in PC64-71),. (AP4, p8)
- The presence of the fault trace approximately 300-400m from Area 1 is expected to result in 3.4m-7m of lateral displacement of the ground surface at the fault trace. The fault trace could therefore pose a hazard to this development area. (AP4, p5)

Given the reported risks, and fundamental significance of this matter to determine whether the land is suitable for development, whether section 106 of the Act can be overcome (and if so at what cost), it is considered that the level of geotechnical site investigation required by Section 16 of the Ministry of Business, Innovation and Employment (2012) be undertaken before any decisions are made. It is considered that Plan Change 71 falls well short of the good practice (*Minimum requirements for geotechnical assessment for land development*) methods introduced in Canterbury to ensure that the same problems do not arise from the development of land of this nature. Very recent experience in Marlborough would strongly suggest that this level of assessment and caution is appropriate in Marlborough also.

1(b). Servicing Constraints

All of the proposed growth areas are constrained by the unavailability of various services and need for significant upgrades, whether for roading, stormwater, water or wastewater. Not only will this add significantly to the costs (and feasibility) of developing these areas, but may also cause significant delays and therefore not achieve the purpose of the Changes (“to meet urgent demand”).

The Plan Change states that the numbering of the Change (1-7) provides an indication of the sequencing yet there is nothing to preclude out of order development. However with closer scrutiny of the Section 32 assessment of servicing constraints, along with the Essential Street Connections (Appendix 5), Provision of Infrastructure and sequencing plans (Attachment 6), and Transport Effects report (Attachment 7), it is evident that the matter of servicing availability will play a significant role in constraining the residential development of the subject areas. These constraints are summarised below, without the additional constraints associated with obtaining discharge consents and consents to widen or pipe streams, easements, and legal access to do the work:

• Stormwater:

- Caseys Creek to be upgraded before Areas 1, 2, 3 and part of 5 can proceed;
- Camerons Creek and Old Fairhall Creek and Yelverton Stream to be upgraded before Area 7 can proceed – given the flood risks in this area already (see Growth Revision (AP3));
- reticulation to Fulton Stream and Murphys Stream to be upgraded before Areas 3 and 6 can proceed;
- Area 6 reliant on Area 3;
- Area 2, 4 and part of 5 reliant on Area 1;
- Area 4 reliant on Area 3.

Note: some of the key watercourses involved contain riparian values that are formally recognised in the WARMP.

• Sewer

- McLaughlan Street pump station and rising main must be upgraded before Areas 1, part of 2, 5 can proceed;
- McLaughlan Street gravity to be upgraded as development proceeds in Areas 1, part of 2 and 5;
- The pump station and rising main at Farnham St to be upgraded before part of Area 2 and 4 can proceed;
- The pump station and rising main at Rose and Adams Streets to be upgraded before Areas 3 and 6 can proceed;
- Areas 2 and 5 reliant in Area 1 proceeding;
- Area 4 reliant on Area 2 proceeding;
- Multiple pumps required in the development of Areas 1, 2, 3, 4 and 6;
- Individual pumps required for each lot within Area 7.

• Water

- Old Renwick Road water main upgraded in advance of Areas 1, 2 and 5;
- Murphys Road water main to be upgraded in advance of Areas 3, 4 and 6;
- McLaughlan Street water main upgraded as development of Areas 1, 2 and 5 progresses;
- Murphys Road water main upgraded as development of Area 2 progresses;
- Southern section of Murphys Road water main upgraded in advance of Area 7.

• Roading

- **Area 1:** Improvements in capacity of Old Renwick Road; and improvement of intersections with Mowat and Coleman Roads (although possibly not until 2030);
- **Area 2:** Improvements in capacity of Old Renwick Road and the intersection with Thompsons Ford Road and Murphys Road (although possibly not until 2030);
- **Area 3:** Improvements in capacity of Old Renwick Road and improvement in the capacity of SH6/Rose Street intersection (possibly by 2022);
- **Area 4:** Improvements in capacity of Old Renwick Road;
- **Area 5:** Improvements in capacity of Old Renwick Road and improvements in intersections

<p>with McLaughlan Road and Waipuna Street (although <u>possibly not until 2030</u>);</p> <ul style="list-style-type: none"> ○ Area 6: Improvements in capacity of <u>Old Renwick Road</u>; ○ Area 7: Upgrading of <u>SH6 intersections</u> with Severne Street and Battys Road. Upgrading of David Street; ○ Connections – all areas are the subject of the roading connections / layout as shown on the planning maps. Hence, development of the areas for residential purposes will be reliant upon the sequencing of development enabled by the frontage properties being developed first; ○ Note: Section 8.1 and 8.2 of the GHD report (Attachment 7 of the Plan Change) provide further information of the road widening and intersection improvements required. 	
<p>1(c). Loss of highly productive soils</p> <p>The Plan Change significantly downplays the adverse effects associated with the loss of high quality and versatile soils. The Plan Change states that these effects are inevitable; despite the fact the area south-western of Blenheim does not contain versatile soils. See Appendix 9.</p> <p>The Plan Change states that in many cases the future use of the soils for food production has already been compromised and that the loss is only 2.18% (209.6ha) of the versatile soils in the Rural 3 zone. The Plan Change states that many of the parcels are in small holdings of less than 2 hectares. (Appendix 9)</p> <p>No mitigation measures are proposed. Furthermore, as set out under 1(d) below, the proposed Plan Changes also significantly downplay the impact of the rezoning on existing highly productive activities both within the Plan Change areas and outside of them. Many existing highly productive activities will find themselves a lot closer to residential activities than they do currently.</p> <p>The loss of highly productive land is a significant resource management issue to this Region and also a key “assessment principle” which is clearly downplayed and a major shortcoming of the changes.</p>	
<p>1(d). Adverse reverse sensitivity effects</p> <p>With regard to the impacts of reverse sensitivity, the AEE submitted simply repeats the following for each of the separate urban growth / Plan Change areas:</p> <p style="padding-left: 40px;"><i>No specific measures proposed. Some tension between rural and residential activities already exists to some degree at present in the area given the amount of “intermixing”. Residential development is likely to be gradual which may assist in reducing impacts.</i></p> <p style="padding-left: 40px;"><i>Rural activities are also subject to existing WARMP rules in respect of activities such as frost fans and spray drift to limit adverse effects.</i></p> <p>In the event that residential development does incrementally expand into Areas 1-7, there will be new residential dwellings constructed in areas or adjoining areas that are currently used for productive purposes or could be used productively in future. As a result, rural properties/activities currently setback well away from the Residential Zone will find themselves a lot closer. Given the presence of Class 1 and 2 soils to the west and north of existing urban boundaries, the actual impacts from reverse sensitivity are likely to be more significant than that assessed in the Plan Change.</p> <p>Reverse sensitivity impacts on the established commercial and industrial activities within areas 3 and 6 have also been largely dismissed. For example, the Bunnings, Pak N save, coolstores, storage business, agricultural supplies yard. Amenity impacts from light spill, visual impacts from large scale buildings, truck movements and operating hours all have the potential to create long term tensions and adverse effects. No mitigation measures or buffers are proposed.</p> <p>Buffer areas alongside the Rural zone interface and alongside the above-mentioned commercial and industrial activities are also recommended in the Revision Strategy in recognition of likely adverse effects. These mitigation measures do not form a part of the Plan Changes.</p>	

1(e). Transmission Lines.

With Transpower Transmissions Lines extending north and north-west from the substation on Old Renwick Road, the effects of residential development on this nationally significant infrastructure is assessed in the plan Change as follows:

Potential no build zones either side of the transmission lines with the area used for open space and roading. As yet Transpower have not responded in respect of possible mitigation measures.

Rule 28.3.5 of the WARMMP requires subdivision proposals located within an area 20m either side of 110kV transmission lines to be considered as discretionary activities and mitigation could be addressed at this time.

With two significant transmission lines through Area 2 comprising a material and significant area, and with the WARMMP requiring 2 x 20m wide corridors either side of each line, the actual impact of this infrastructure on Area 2 in terms of area affected is significant. This will further complicate any attempts to subdivide this land, with the feasibility and attractiveness of subdivision also negatively impacted.

The National Environmental Standard on Electricity Transmission contains significant guidance on the management of subdivision and development in close proximity to transmission lines. Consultation with Transpower should have been undertaken before the Plan Changes were adopted by Council for notification. The NES should have also been addressed in detail in the Section 32 report.

The Revision Strategy recommends a 64m (total width) corridor over each of these transmission lines however this does not form a part of the Plan Changes.

1(f). Ecological Effects / Natural values

With regard to the AEE provided as a part of the Plan Changes, the following statement is made in relation to Areas 1, 2, 3, 4, 5, 6, and 7:

Area does not contain any identified natural feature of significance having regard to the findings of the growth strategy and the provisions of the WARMMP

This dismissal of natural values and ecological effects is in contrast to the ecological sensitivities reported in SMUGS (pp102 and 104). Inadequate consideration has, it would seem also been given to values present in stream such as Caseys Creek.

2. The appropriateness of the policy, rules and methods given the significant resource management issues / risks arising.

Individually and in combination the resource management issues relevant to the proposal Plan Changes are cause for concern as to the appropriateness of the provisions.

3. The inability to deliver affordable residential allotments in a timely manner i.e the effectiveness, efficiency, benefits and costs of the policy, rules and methods.

The Plan Change is very clear about the urgent need to make provision for new land for residential growth. The Plan Change states that current vacant residential land is only able to meet a short supply of 2-5 years. The EMS report on Residential Availability recommends "urgent action" is undertaken to address this shortage. Beyond that, approximately 1500 new sections are reportedly required to the year 2031.

Furthermore in terms of affordability, the Plan Change states:

"Land availability has also been a key focus for recent central government initiatives to improve the affordability of housing. Under this scenario the provision of sufficient appropriately zoned land is intended to ensure section prices are not inflated by a shortage of suitable land".

For the reasons outlined in Section 1(a)-1(e) of this submission, it is considered that the subject Plan Changes will not be able to deliver new residential land in a timely or cost effective manner to meet demand. Furthermore, it is considered that the various servicing constraints/costs and geotechnical risks will cause the resultant sections to be unaffordable to the bulk of the population. The feasibility of developing residential sections on this basis is considered to be highly doubtful. The Council's own assessment of the zone levies for each of the development areas (dated 27/6/2013 -see attached) shows that the levy per lot ranges from \$23,600 to \$28,700 per lot, compared to \$12,773 for the Council's subdivision in southern Blenheim. This excludes the Development Contributions of approximately \$22,500 per lot, land costs, design costs, engineering assessment costs, construction costs and other professional fees. Even if developed, it is considered highly likely that the sections developed will be tagged with consent notices identifying the risks of liquefaction – which is likely to impact on insurance.

4. The inconsistency of the Plan Change with the “assessment principles” promoted in the urban growth strategy.

It is submitted that support for these Plan Changes cannot be found within the various documents now making up the Urban Growth Strategy. Many of the causes for this inconsistency are set out in Section 1 of this submission, however with reference to the “Sustainable urban growth principles” listed in Section 2.1 of the Revision Strategy (Appendix 3 of the Plan Change):

(a) Affordable Growth

The Strategy states that to provide for affordable growth, it has avoided development in areas that are liquefaction-prone, located development in locations where the lowest infrastructure investment is required, and kept Blenheim as compact as possible. The Section 32 information clearly shows that the Areas selected are not consistent with this affordability principle.

(b) Efficient Access

The Strategy states that efficient access is achieved through locating development where local connections enable non-vehicular movement, and locating development close to commercial and community amenities. With regard to non-vehicular movement, the SMUGS document identified riparian margins along streams and rivers and existing significant walkways as servicing this function. None of the Areas selected are located near such linkages, and will also be located on the opposite side of Old Renwick Road.

(c) Valuable Soils

The principles applied under this heading are stated as:

- *Aiming for an ambitious, yet realistic infill and intensification programme and locating the balance of the growth needs in a way that is as compact as possible.*
- *Buffering residential development in order to avoid reverse sensitivity between living and rural production soils.*
- *Preferring urban expansion onto Class 2 soils over expansion onto Class 1 soils.*

The Plan Change does not contain any intensification provisions or programmes, with all but one of the selected Areas in the periphery. Nor are any buffering provisions included, with the assessment of actual and potential adverse cross boundary / reverse sensitivity effects referring to existing plan rules. Likewise, Areas 3 and 6 contain Class A soils.

(d) Healthy Ecosystems

This involves accommodating, retaining and restoring natural features, ecosystems, and water quality issues. With identified infrastructure plans to pipe streams such as Caseys Creek the Changes would seem to rely on infrastructure upgrades that are inconsistent with these environmental objectives. Likewise, Areas 3 and 6 are ecologically sensitive due to the catchment

<p>area of local streams (SMUGS, p102).</p> <p>(e) Quality Open Space</p> <p>This principle overlaps with the Efficient Access principle noted above. None of the selected Areas has good connectivity to existing public open spaces.</p> <p>(f) Unique Towns (g) Thriving Tourism (h) Growing Employment</p> <p>The Revised Strategy also recommends (Section 2.2) a Structure Plan for each growth area will be designed prior to subdivision. The Plan Change does not contain such a requirement, other than to observe the indicative roads proposed and to provide an Accepted Services Plan.</p>	
<p>5. The inadequacy of the Section 32.</p> <p>It is considered that the Section 32 report has not adequately addressed the costs and risks of the rules proposed. Based on the current information available, it is considered that these Plan Changes will not effectively achieve the outcomes / objectives sought.</p>	
<p>6. Part 2 of the Resource Management Act 1991.</p> <p>Importantly, it is considered that the Plans do not achieve the sustainable management of natural and physical resources in a way that will enable the community to provide for its social and economic wellbeing and for their health and safety.</p>	
<p>The specific provisions <i>opposed, supported, or to be amended</i> are listed below.</p> <ul style="list-style-type: none"> (i) The Plan Changes in their entirety are opposed and shall be declined. (ii) Defer the rezoning until the infrastructure and hazards issues are resolved so that there can be confidence the land will be able to be used efficiently and effectively for residential development. 	
Part B: The specific provisions and decision sought	
<p>Plan Change 64 (Area 1)</p> <p>Amend Planning Maps 156 and 157 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 65 (Area 2)</p> <p>Amend Planning Map 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 66 (Area 3)</p> <p>Amend Planning Map 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 67 (Area 4)</p> <p>Amend Planning Maps 146 and 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 68 (Area 5)</p> <p>Amend Planning Map 157 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	

<p>Plan Change 69 (Area 6)</p> <p>Amend Planning Map 147 and 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 70 (Area 7)</p> <p>Amend Planning Map 160 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>PC64-70</p>	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above</p>
<p>Plan Change 71 (Subsoil Investigations and Roading Layout)</p> <p>Amend the WARMP by the following:</p> <p>5.8.1 Subsoil Investigations</p> <p><u>Chapter 29 Standard Requirements for Subdivision and Development</u></p> <p>Insert new rule under 29.1.4 after 291.4.1 on page 29-4 as follows</p> <p><u>29.1.4.2 Subsoil Investigations</u></p> <p><i>All applications for subdivision consent for land identified in Appendix L shall be accompanied by a report from an expert acceptable to Council on the subsoil condition of each proposed allotment. The report shall provide the results of at least four scala penetrometer tests for each allotment. Each sample point is to have a field value recorded, obtained in accordance with NZS4402:1996, and is to be geo-referenced to survey marks. The report shall interpret the field values of the penetrometer test in terms of kilo Pascals (kPA) and state the basis (authority) for the interpretation.</i></p> <p><i>In addition one inspection pit shall be constructed for every 3 proposed allotments to confirm subsoil properties. The inspection pit shall be geo-referenced and the report shall include the logged soil profile.</i></p> <p><i>Unless the recorded field soil strength from the scala penetrometer tests for an allotment is at least 300 kPA at a depth of at least 0.3 metres, then a consent notice will be imposed on the allotment requiring specific foundation design for any dwelling house at the time of building consent.</i></p> <p><i>Note: field values are those obtained before any factoring is applied, for instance – safety factors</i></p> <p><u>Volume 2</u></p> <p>Insert a new “Appendix L Areas subject to Sub-Soil Investigation” in Volume 2 of the WARMP (attached in Appendix 11 to this document)</p> <p>5.82 Roading Layout</p> <p><u>Chapter 23.0 Subdivision and Development</u></p> <p>Insert new policy under 23.5.1 Objectives and Policies after Policy 1.17 on page 23-11 as follows:</p> <p><u>Policy 1.18 Where indicative roading layouts are shown on the planning maps the roading network proposed at the time of subdivision and development shall be in general accordance with the layout.</u></p>	

5.8.1	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above.</p>	
29.1.4	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above.</p>	
Appendix L	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above.</p>	
Policy 1.18	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above.</p>	

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	MAURICE DOUGLAS CRESSWELL			
Organisation (if applicable)				
Contact Person (if applicable)	MAURICE CRESSWELL			
Postal Address	6 Blicks Lane R.D. 2			
	Blenheim			
		Post Code	7272	
Email	thosecresswells@stra.co.nz			
Telephone	Business	Home	035785658	
	Fax	Mobile	0274339521	
Address for Service	6 Blicks Lane RD2			
(if different from above)	Blenheim			
		Post Code	7272	
Signature (of submitter or person authorised to sign on behalf of submitter)	M. D. Cresswell		Date	30th Aug 2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

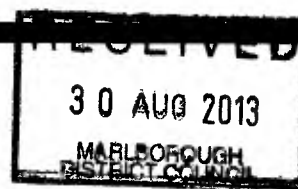
4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

Plan Changes 64-65-66-67-68-69

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

This is good Productive Horticulture land
and a shame to be wasted for Housing.
I do not support these changes.

Do not wish to be rated off our property

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

Continue on a separate sheet if necessary

RECEIVED

26 AUG 2013

MARLBOROUGH DISTRICT COUNCIL



MARLBOROUGH DISTRICT COUNCIL

Submission on Plan Change 64 - Blenheim Growth Area One - Rezoning to the Wairau/Awatere Resource Management Plan

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name: Gregory Michael Smith

Organisation (if applicable): DeLuxe Properties Limited

Contact Person (if applicable): Greg Smith

Postal Address: P O Box 749
Blenheim
Post Code: 720

Email: greg@deluxegroup.co.nz

Telephone Business: 35,783,310 Home:
Fax: 35,783,314 Mobile: 274,492,404

Address for Service:
(if different from above):
Post Code:
Signature (of submitter or person authorised to sign on behalf of submitter):
Date: 14/8/13

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

The Re-Zoning of land for future residential growth

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

Our company is a Property Development company which relies on land to have a Residential Zoning so that we are able to create new residential housing developments. As a land owner and Company we fully support this Plan change along with the other Plan changes to open up more land for the purpose of residential development. In our view there should always be land available and Zoned for some 10 years supply in advance. This effectively will keep a lid on both the raw land price that we pay prior to development and will reflect in the price the consumer pays when sections are released to the market. Like most things the market prices are determined by supply and demand.

Right now there is a real shortage of quality sections in areas other than Taylor Pass Road. In the next 18 months the pressure is going to become even more evident as there is nothing coming on stream and existing sections are slowly being snapped up. I believe that in next year the building sector will potentially suffer as we await for new development to proceed. We have already lost a lot of tradespeople to Australia and Christchurch and we can't afford to lose more due to the building sector not having sufficient land to build on.

Continued on separate page ...

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

A speedy process so that the building sector does not get adversely affected with a lack of available sections to build on.

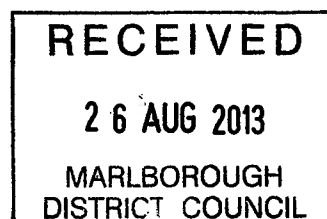
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Greg Smith - Submission continued .. Plan Change 64

The Springlands area of Blenheim has always been very popular to live. People like the fertile land as they are able to develop fantastic gardens both for vegetables and for peace and tranquillity. Being able to grow your own vegetables and being more self-sufficient is a major advantage to any family. I personally live in Dry Hills. For us to successfully establish a vegetable garden we ended up importing several truckloads of soil from Springlands. Also the Springlands area does not require the amount of irrigation that many other parts of town requires. This must be a considerable saving in the longer term when it comes to both the pumping and supply of water.

In much of the planning which was done by Urbanism Plus there was a strong emphasis on connectivity. To the west of Adams Lane and Murphy's Road, opportunities have been lost over the years as planning did not allow for connecting roads and services to the east. I understand the need for having a main grid roading system to connect all of the varying areas which are planned, however it is also important to many people that smaller intimate areas with cul-de-sacs and the likes are also allowed, as many people don't want to live on main thoroughfares.

Much thought and consultation with property owners will be needed to make sure that existing storm-water ditches, which in many cases separate ownership, are best utilised for the likes of Road Reserve / berms and are carefully planned for. Also consideration needs to be given to existing right-of-ways etc so that they don't become obsolete or remain in no-mans-land. I have given considerable thought to these issues for Plan Change 64 and I believe that I have solutions from the outset. I would like the opportunity to discuss these issues before any final roading plans are proposed should this Plan change be approved.



30 August 2013



Marlborough District Council
PO Box 443
Blenheim 7240
Attn: Planning Technician

P O Box 343, Nelson 7040
Phone: 03 539 0330
Mobile: 027 244 3388
Email: mark@landmarklile.co.nz
www.landmarklile.co.nz

Dear Sir/Madam,

Submission on Plan Change 64-71 (Wairau/Awatere Resource Management Plan)

Mark Davis

Please find attached a submission from Mark Davis on Plan Changes 64-71.

Mark Davis strongly supports the provision of new urban land to accommodate residential growth, it opposes Plan Changes 64-71. The reasons for this opposition and the decisions sought are set out in the attached submissions.

Mark Davis seeks to be heard in support of this submission.

Please contact me if you have any queries.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Mark Lile".

Mark Lile

Landmark Lile Limited

Resource Management Consultancy

cc. Mark Davis
C/- Hardy-Jones Clark
PO Box 646
Blenheim

Form 5

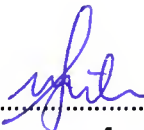
Submission on Proposed Plan Changes 64 to 71
(Wairau/Awatere Resource Management Plan)

Clause 6 of the First Schedule, Resource Management Act 1991

To: Planning Technician
Marlborough District Council
PO Box 443
Blenheim7240

Name of Submitter: Mark Davis

Representative / Contact: Landmark Lile Limited
PO Box 343
Nelson
Attn: Mark Lile (Resource Management Consultant)


Signature of authorised person 30 August 2013

Part A: Plan Change 64-71

Reasons for these submissions

Mark Davis opposes Plan Changes 64-71 for the reasons and explains the reasons for this opposition under the following headings and subheadings:

1. **Suitability** of Areas 1-7, having regard to **adverse effects and constraints** caused by:
 - a. Risks from liquefaction;
 - b. Servicing constraints;
 - c. Loss of highly productive soils;
 - d. Adverse reverse sensitivity effects;
 - e. Transmission lines;
 - f. Ecological effects / natural values.
2. The **appropriateness** of the policy, rules and methods given the significant resource management issues / risks arising;
3. The inability to deliver affordable residential allotments in a timely manner i.e the **effectiveness, efficiency, benefits and costs** of the policy, rules and methods;
4. The **inconsistency of the Plan Change with the "assessment principles"** promoted in the urban growth strategy;
5. The **inadequacy of the Section 32**.
6. **Part 2** of the Act.

1(a). Risks of Liquefaction

The geotechnical reports supporting the Plan Change Request (Appendices 2 and 4) confirm that there is potential liquefaction in some of the growth areas. The Plan Change states that this risk is not significant enough to preclude development. The methods proposed to mitigate the risks is to require specific foundation design for buildings (Change 71).

The section 32 report states that the risk for each of Area 1 to 7 is "low". However in terms of Growth Area 5 (PC68) states that "a setback is provided from the existing drain that runs along the northern side of Old Renwick Road because of lateral spread" (p28). This same drain (Caseys Creek) also extends through the middle of Areas 1, 2 and 4. It is submitted that this drain (and associated groundwater and ground conditions) present a significant risk to residential development of these areas. These risks have been understated in the Section 32 report as "low" when in fact the geotechnical reports supporting the Plan Change collectively send a very different message:

- "The Dillans Point Formation soils are highly vulnerable to liquefaction ..." (AP2, p1);
- "The risk of lateral spreading is lower in areas Na:Nb and SE, however there is still potential for lateral spreading towards drainage channels that cross these sites" (AP2, p1);
- "Ground improvement and robust deep foundations to mitigate the risk of liquefaction and lateral spreading are very costly. ... these very costly methods are likely to lead to prohibitively high development costs. In this regard we also note the government's decision not to allow redevelopment of (red zone) residential areas in Christchurch that were subject to liquefaction or lateral spreading, rather than carry out very costly ground improvement to mitigate against future liquefaction". (AP2, p1);
- "From a sustainability perspective, it would not be prudent to encourage development on land which will require considerable costs and consume substantially more resources compared to development on land which is more stable in earthquake and other hazards. This is on the basis that it would be more sustainable to develop areas subject to a lower level of hazard, such as the alluvial plains to the west of Blenheim" (AP2, p1) (see Figure 2A, dated Feb 2013, Appendix 4 of the Plan Change);
- For Area Na:Nb "Analysis showed the shallow silty sand layer above the gravels as liquefiable for all return period events considered" and "The Potential for liquefaction ... will be strongly influenced by the ground water table" (AP2, p9)
- "Liquefaction in this area may lead to lateral spreading of the land towards nearby streams and drains although the effects are likely to be limited given the relatively thin deposits of liquefiable material, except close to the southeast boundary with thicker deposits and northeast boundary, close to the river" (AP2, p11);
- Lateral spreading is likely to be a significant issue in Area 6 (now Area 7 in PC64-71). (AP4, p8)
- The presence of the fault trace approximately 300-400m from Area 1 is expected to result in 3.4m-7m of lateral displacement of the ground surface at the fault trace. The fault trace could therefore pose a hazard to this development area. (AP4, p5)

Given the reported risks, and fundamental significance of this matter to determine whether the land is suitable for development, whether section 106 of the Act can be overcome (and if so at what cost), it is considered that the level of geotechnical site investigation required by Section 16 of the Ministry of Business, Innovation and Employment (2012) be undertaken before any decisions are made. It is considered that Plan Change 71 falls well short of the good practice (*Minimum requirements for geotechnical assessment for land development*) methods introduced in Canterbury to ensure that the same problems do not arise from the development of land of this nature. Very recent experience in Marlborough would strongly suggest that this level of assessment and caution is appropriate in Marlborough also.

1(b). Servicing Constraints

All of the proposed growth areas are constrained by the unavailability of various services and need for significant upgrades, whether for roading, stormwater, water or wastewater. Not only will this add significantly to the costs (and feasibility) of developing these areas, but may also cause significant delays and therefore not achieve the purpose of the Changes (“to meet urgent demand”).

The Plan Change states that the numbering of the Change (1-7) provides an indication of the sequencing yet there is nothing to preclude out of order development. However with closer scrutiny of the Section 32 assessment of servicing constraints, along with the Essential Street Connections (Appendix S), Provision of Infrastructure and sequencing plans (Attachment 6), and Transport Effects report (Attachment 7), it is evident that the matter of servicing availability will play a significant role in constraining the residential development of the subject areas. These constraints are summarised below, without the additional constraints associated with obtaining discharge consents and consents to widen or pipe streams, easements, and legal access to do the work:

• Stormwater:

- Caseys Creek to be upgraded before Areas 1, 2, 3 and part of S can proceed;
- Camerons Creek and Old Fairhall Creek and Yelverton Stream to be upgraded before Area 7 can proceed – given the flood risks in this area already (see Growth Revision (AP3));
- reticulation to Fulton Stream and Murphys Stream to be upgraded before Areas 3 and 6 can proceed;
- Area 6 reliant on Area 3;
- Area 2, 4 and part of S reliant on Area 1;
- Area 4 reliant on Area 3.

Note: some of the key watercourses involved contain riparian values that are formally recognised in the WARMP.

• Sewer

- McLaughlan Street pump station and rising main must be upgraded before Areas 1, part of 2, 5 can proceed;
- McLaughlan Street gravity to be upgraded as development proceeds in Areas 1, part of 2 and S;
- The pump station and rising main at Farnham St to be upgraded before part of Area 2 and 4 can proceed;
- The pump station and rising main at Rose and Adams Streets to be upgraded before Areas 3 and 6 can proceed;
- Areas 2 and S reliant in Area 1 proceeding;
- Area 4 reliant on Area 2 proceeding;
- Multiple pumps required in the development of Areas 1, 2, 3, 4 and 6;
- Individual pumps required for each lot within Area 7.

• Water

- Old Renwick Road water main upgraded in advance of Areas 1, 2 and S;
- Murphys Road water main to be upgraded in advance of Areas 3, 4 and 6;
- McLaughlan Street water main upgraded as development of Areas 1, 2 and S progresses;
- Murphys Road water main upgraded as development of Area 2 progresses;
- Southern section of Murphys Road water main upgraded in advance of Area 7.

• Roading

- **Area 1:** Improvements in capacity of Old Renwick Road; and improvement of intersections with Mowat and Coleman Roads (although possibly not until 2030);
- **Area 2:** Improvements in capacity of Old Renwick Road and the intersection with Thompsons Ford Road and Murphys Road (although possibly not until 2030);
- **Area 3:** Improvements in capacity of Old Renwick Road and improvement in the capacity of SH6/Rose Street intersection (possibly by 2022);
- **Area 4:** Improvements in capacity of Old Renwick Road;
- **Area 5:** Improvements in capacity of Old Renwick Road and improvements in intersections

<p>with McLaughlan Road and Waipuna Street (although <u>possibly not until 2030</u>);</p> <ul style="list-style-type: none"> ○ Area 6: Improvements in capacity of <u>Old Renwick Road</u>; ○ Area 7: Upgrading of <u>SH6 intersections</u> with Severne Street and Battys Road. Upgrading of David Street; ○ Connections – all areas are the subject of the roading connections / layout as shown on the planning maps. Hence, development of the areas for residential purposes will be reliant upon the sequencing of development enabled by the frontage properties being developed first; ○ Note: Section 8.1 and 8.2 of the GHD report (Attachment 7 of the Plan Change) provide further information of the road widening and intersection improvements required. 	
<p>1(c). Loss of highly productive soils</p> <p>The Plan Change significantly downplays the adverse effects associated with the loss of high quality and versatile soils. The Plan Change states that these effects are inevitable; despite the fact the area south-western of Blenheim does not contain versatile soils. See Appendix 9.</p> <p>The Plan Change states that in many cases the future use of the soils for food production has already been compromised and that the loss is only 2.18% (209.6ha) of the versatile soils in the Rural 3 zone. The Plan Change states that many of the parcels are in small holdings of less than 2 hectares. (Appendix 9)</p> <p>No mitigation measures are proposed. Furthermore, as set out under 1(d) below, the proposed Plan Changes also significantly downplay the impact of the rezoning on existing highly productive activities both within the Plan Change areas and outside of them. Many existing highly productive activities will find themselves a lot closer to residential activities than they do currently.</p> <p>The loss of highly productive land is a significant resource management issue to this Region and also a key “assessment principle” which is clearly downplayed and a major shortcoming of the changes.</p>	
<p>1(d). Adverse reverse sensitivity effects</p> <p>With regard to the impacts of reverse sensitivity, the AEE submitted simply repeats the following for each of the separate urban growth / Plan Change areas:</p> <p style="padding-left: 40px;"><i>No specific measures proposed. Some tension between rural and residential activities already exists to some degree at present in the area given the amount of “intermixing”. Residential development is likely to be gradual which may assist in reducing impacts.</i></p> <p style="padding-left: 40px;"><i>Rural activities are also subject to existing WARMPS rules in respect of activities such as frost fens and spray drift to limit adverse effects.</i></p> <p>In the event that residential development does incrementally expand into Areas 1-7, there will be new residential dwellings constructed in areas or adjoining areas that are currently used for productive purposes or could be used productively in future. As a result, rural properties/activities currently setback well away from the Residential Zone will find themselves a lot closer. Given the presence of Class 1 and 2 soils to the west and north of existing urban boundaries, the actual impacts from reverse sensitivity are likely to be more significant than that assessed in the Plan Change.</p> <p>Reverse sensitivity impacts on the established commercial and industrial activities within areas 3 and 6 have also been largely dismissed. For example, the Bunnings, Pak N save, coolstores, storage business, agricultural supplies yard. Amenity impacts from light spill, visual impacts from large scale buildings, truck movements and operating hours all have the potential to create long term tensions and adverse effects. No mitigation measures or buffers are proposed.</p> <p>Buffer areas alongside the Rural zone interface and alongside the above-mentioned commercial and industrial activities are also recommended in the Revision Strategy in recognition of likely adverse effects. These mitigation measures do not form a part of the Plan Changes.</p>	

1(e). Transmission Lines.

With Transpower Transmissions Lines extending north and north-west from the substation on Old Renwick Road, the effects of residential development on this nationally significant infrastructure is assessed in the plan Change as follows:

Potential no build zones either side of the transmission lines with the area used for open space and roading. As yet Transpower have not responded in respect of possible mitigation measures.

Rule 28.3.5 of the WARMPP requires subdivision proposals located within an area 20m either side of 110kV transmission lines to be considered as discretionary activities and mitigation could be addressed at this time.

With two significant transmission lines through Area 2 comprising a material and significant area, and with the WARMPP requiring 2 x 20m wide corridors either side of each line, the actual impact of this infrastructure on Area 2 in terms of area affected is significant. This will further complicate any attempts to subdivide this land, with the feasibility and attractiveness of subdivision also negatively impacted.

The National Environmental Standard on Electricity Transmission contains significant guidance on the management of subdivision and development in close proximity to transmission lines. Consultation with Transpower should have been undertaken before the Plan Changes were adopted by Council for notification. The NES should have also been addressed in detail in the Section 32 report.

The Revision Strategy recommends a 64m (total width) corridor over each of these transmission lines however this does not form a part of the Plan Changes.

1(f). Ecological Effects / Natural values

With regard to the AEE provided as a part of the Plan Changes, the following statement is made in relation to Areas 1, 2, 3, 4, 5, 6, and 7:

Area does not contain any identified natural feature of significance having regard to the findings of the growth strategy and the provisions of the WARMPP

This dismissal of natural values and ecological effects is in contrast to the ecological sensitivities reported in SMUGS (pp102 and 104). Inadequate considerations have, it would seem also been given to values present in stream such as Caseys Creek.

2. The appropriateness of the policy, rules and methods given the significant resource management issues / risks arising.

Individually and in combination the resource management issues relevant to the proposal Plan Changes are cause for concern as to the appropriateness of the provisions.

3. The inability to deliver affordable residential allotments in a timely manner i.e the effectiveness, efficiency, benefits and costs of the policy, rules and methods.

The Plan Change is very clear about the urgent need to make provision for new land for residential growth. The Plan Change states that current vacant residential land is only able to meet a short supply of 2-5 years. The EMS report on Residential Availability recommends "urgent action" is undertaken to address this shortage. Beyond that, approximately 1500 new sections are reportedly required to the year 2031.

Furthermore in terms of affordability, the Plan Change states:

"Land availability has also been a key focus for recent central government initiatives to improve the affordability of housing. Under this scenario the provision of sufficient appropriately zoned land is intended to ensure section prices are not inflated by a shortage of suitable land".

For the reasons outlined in Section 1(a)-1(e) of this submission, it is considered that the subject Plan Changes will not be able to deliver new residential land in a timely or cost effective manner to meet demand. Furthermore, it is considered that the various servicing constraints/costs and geotechnical risks will cause the resultant sections to be unaffordable to the bulk of the population. The feasibility of developing residential sections on this basis is considered to be highly doubtful. The Council's own assessment of the zone levies for each of the development areas (dated 27/6/2013 -see attached) shows that the levy per lot ranges from \$23,600 to \$28,700 per lot, compared to \$12,773 for the Council's subdivision in southern Blenheim. This excludes the Development Contributions of approximately \$22,500 per lot, land costs, design costs, engineering assessment costs, construction costs and other professional fees. Even if developed, it is considered highly likely that the sections developed will be tagged with consent notices identifying the risks of liquefaction – which is likely to impact on insurance.

4. The inconsistency of the Plan Change with the “assessment principles” promoted in the urban growth strategy.

It is submitted that support for these Plan Changes cannot be found within the various documents now making up the Urban Growth Strategy. Many of the causes for this inconsistency are set out in Section 1 of this submission, however with reference to the “Sustainable urban growth principles” listed in Section 2.1 of the Revision Strategy (Appendix 3 of the Plan Change):

(a) Affordable Growth

The Strategy states that to provide for affordable growth, it has avoided development in areas that are liquefaction-prone, located development in locations where the lowest infrastructure investment is required, and kept Blenheim as compact as possible. The Section 32 information clearly shows that the Areas selected are not consistent with this affordability principle.

(b) Efficient Access

The Strategy states that efficient access is achieved through locating development where local connections enable non-vehicular movement, and locating development close to commercial and community amenities. With regard to non-vehicular movement, the SMUGS document identified riparian margins along streams and rivers and existing significant walkways as servicing this function. None of the Areas selected are located near such linkages, and will also be located on the opposite side of Old Renwick Road.

(c) Valuable Soils

The principles applied under this heading are stated as:

- *Aiming for an ambitious, yet realistic infill and intensification programme and locating the balance of the growth needs in a way that is as compact as possible.*
- *Buffering residential development in order to avoid reverse sensitivity between living and rural production soils.*
- *Preferring urban expansion onto Class 2 soils over expansion onto Class 1 soils.*

The Plan Change does not contain any intensification provisions or programmes, with all but one of the selected Areas in the periphery. Nor are any buffering provisions included, with the assessment of actual and potential adverse cross boundary / reverse sensitivity effects referring to existing plan rules. Likewise, Areas 3 and 6 contain Class A soils.

(d) Healthy Ecosystems

This involves accommodating, retaining and restoring natural features, ecosystems, and water quality issues. With identified infrastructure plans to pipe streams such as Caseys Creek the Changes would seem to rely on infrastructure upgrades that are inconsistent with these environmental objectives. Likewise, Areas 3 and 6 are ecologically sensitive due to the catchment

<p>area of local streams (SMUGS, p102).</p> <p>(e) Quality Open Space</p> <p>This principle overlaps with the Efficient Access principle noted above. None of the selected Areas has good connectivity to existing public open spaces.</p> <p>(f) Unique Towns (g) Thriving Tourism (h) Growing Employment</p> <p>The Revised Strategy also recommends (Section 2.2) a Structure Plan for each growth area will be designed prior to subdivision. The Plan Change does not contain such a requirement, other than to observe the indicative roads proposed and to provide an Accepted Services Plan.</p>	
<p>5. The inadequacy of the Section 32.</p> <p>It is considered that the Section 32 report has not adequately addressed the costs and risks of the rules proposed. Based on the current information available, it is considered that these Plan Changes will not effectively achieve the outcomes / objectives sought.</p>	
<p>6. Part 2 of the Resource Management Act 1991.</p> <p>Importantly, it is considered that the Plans do not achieve the sustainable management of natural and physical resources in a way that will enable the community to provide for its social and economic wellbeing and for their health and safety.</p>	
<p>The specific provisions <i>opposed, supported, or to be amended</i> are listed below.</p> <ul style="list-style-type: none"> (i) The Plan Changes in their entirety are opposed and shall be declined. (ii) Defer the rezoning until the infrastructure and hazards issues are resolved so that there can be confidence the land will be able to be used efficiently and effectively for residential development. 	

Part B: The specific provisions and decision sought	
<p>Plan Change 64 (Area 1)</p> <p>Amend Planning Maps 156 and 157 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 65 (Area 2)</p> <p>Amend Planning Map 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 66 (Area 3)</p> <p>Amend Planning Map 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 67 (Area 4)</p> <p>Amend Planning Maps 146 and 156 by rezoning an area of land from Rural Three Zone to Urban Residential Two Zone and inserting an indicative roading layout over the same area.</p>	
<p>Plan Change 68 (Area 5)</p> <p>Amend Planning Map 157 by rezoning an area of land from Rural Three Zone to Urban Residential</p>	

Twa Zane and inserting an indicative roading layout over the same area.		
Plan Change 69 (Area 6) Amend Planning Map 147 and 156 by rezoning an area of land from Rural Three Zane to Urban Residential Two Zone and inserting an indicative roading layout over the same area.		
Plan Change 70 (Area 7) Amend Planning Map 160 by rezoning an area of land from Rural Three Zane to Urban Residential Two Zane and inserting an indicative roading layout over the same area.		
PC64-70	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission.</p> <p><u>Reason</u> As set out in Part A above</p>	
<p>Plan Change 71 (Subsoil Investigations and Roading Layout) Amend the WARMP by the following:</p> <p>5.8.1 Subsail Investigations</p> <p><u>Chapter 29 Standard Requirements for Subdivision and Development</u></p> <p>Insert new rule under 29.1.4 after 291.4.1 on page 29-4 as follows</p> <p><u>29.1.4.2 Subsail Investigations</u></p> <p><u>All applications for subdivision consent for land identified in Appendix L shall be accompanied by a report from an expert acceptable to Council on the subsail condition of each proposed allotment. The report shall provide the results of at least four scale penetrometer tests for each allotment. Each sample point is to have a field value recorded, obtained in accordance with NZS4402:1996, and is to be geo-referenced to survey marks. The report shall interpret the field values of the penetrometer test in terms of kilo Pascals (kPa) and state the basis (authority) for the interpretation.</u></p> <p><u>In addition one inspection pit shall be constructed for every 3 proposed allotments to confirm subsail properties. The inspection pit shall be geo-referenced and the report shall include the lagged soil profile.</u></p> <p><u>Unless the recorded field soil strength from the scale penetrometer tests for an allotment is at least 300 kPa at a depth of at least 0.3 metres, then a consent notice will be imposed on the allotment requiring specific foundation design for any dwelling house at the time of building consent.</u></p> <p><u>Note: field values are those obtained before any factoring is applied, for instance – safety factors</u></p> <p><u>Volume 2</u></p> <p>Insert a new “Appendix L Areas subject to Sub-Soil Investigation” in Volume 2 of the WARMP (attached in Appendix 11 to this document)</p> <p>5.82 Roading Layout</p> <p><u>Chapter 23.0 Subdivision and Development</u></p> <p>Insert new policy under 23.5.1 Objectives and Policies after Policy 1.17 on page 23-11 as follows:</p> <p><u>Policy 1.18 Where indicative roading layouts are shown on the planning maps the roading network proposed at the time of subdivision and development shall be in general accordance with the layout.</u></p>		

<p>5.8.1</p>	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission. <u>Reason</u> As set out in Part A above.</p>	
<p>29.1.4</p>	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission. <u>Reason</u> As set out in Part A above.</p>	
<p>Appendix L</p>	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission. <u>Reason</u> As set out in Part A above.</p>	
<p>Policy 1.18</p>	<p><u>Decision Sought</u> Decline Plan Change; or Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised in this submission. <u>Reason</u> As set out in Part A above.</p>	

Mark Caldwell-8225

From: Alasdair Drew & Cherie Maffey [enchantedfarm@farmside.co.nz]

Sent: Sunday, 1 September 2013 9:21 a.m.

To: Plan Change Urban Growth

Subject: Blenheim expansion

Re Wairau/Awatere Resource Management Plan and Blenheim's Expansion

proposed by council, to spread Blenheim to the north and west (areas 64 to 69) as this will be over highly fertile, productive land.

at in town planning terms this is a very poor proposal. **Blenheim's expansion should logically be to the south-west on poorer soils.**

Alasdair Drew,
Northbank
Marlborough

RECEIVED
MCO
19 AUG 2013
MARLBOROUGH
DISTRICT COUNCIL

Submission on Plan Change 68 - 64-65-67-66-69-70
Blenheim Growth Area Five - Rezoning
to the Wairau/Atawere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name: JOHN TORANG FORD

Organisation (if applicable):

Contact Person (if applicable):

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Telephone Business: [] Home: 03 570 5481

Fax: [] Mobile: []

Address for Service: AS ABOVE

(if different from above):

Post Code: [] [] [] []

Signature (of submitter or person authorised to sign on behalf of submitter): [Signature]

Date: 19/8/13

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No ✓

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No ✓

BUT I WOULD LIKE TO KNOW IT HAS BEEN READ.

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

SEE SEPARATE SHEET.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

Continue on a separate sheet if necessary

In re cent times earthquake activity has made it again obvious that subsurface movement is normal for this part of the planet surface. As it cannot be opposed we must learn to live with it and use whatever means available to reduce the adverse effects. So to build domestic housing on the most stable ground makes sense.

However, it is also becoming more probable, that within the lives of those recently born, the rise in population numbers worldwide will make more than the present two billion people extreemly hungry. The expected seawater flooding of fertile coastal land and the extreemes of frequent adverse weather events increase the necessity to preserve soil capable of growing food. The prospect of war over water and food is real.

Therefore, on balance, all the proposed plan and zone changes must be opposed.

Knowledge gained from the Christchurch quakes must be considered to allow building to the east of Blenheim. Liquifaction could be reduced if provisions in the home building codes would include the necessity of ground compaction, deep piling, and wooden construction.

Media induced panic and sensation must not prevail.

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

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



RECEIVED

27 AUG 2013

MARLBOROUGH
DISTRICT COUNCIL

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Andrew Leigh GIFFORD and Vicki Maree GIFFORD			
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	Fax	Mobile	027 231 7948 ^{272 317 948}	
Address for Service	70 Blicks Lane			
(if different from above)	RD2			
	Blenheim	Post Code	7272	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	26-Aug 2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:



The entirety of Proposed Plan Change 67

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

Oppose the proposed Plan change 67 for the reasons attached.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

Complete removal of Proposed Plan Change 67 from the suite of proposals.

Continue on a separate sheet if necessary



Our submission is:

We are opposed in full to Plan Change 67 (Area 4) for the following reasons:

1. **Subdivision of Productive Land** - there are large rural blocks in area 4 which are utilised for grape production, grazing. The soils in this area are excellent for such productive uses and we do not consider that such land should be compromised by residential development. We consider that land in the south west of Blenheim towards Benmorven and Fairhall – that are of lesser quality and that have already seen more intensive residential development would be preferable areas for development.
2. **Reverse Sensitivities with respect to rural land** – Our rural property at the end of Blinks Lane (that would abut part of proposed area 4) has been planted in grapes since the late 1970s. We utilise bird scaring methods (including gas guns and shooting), spraying, and harvesting is very frequently undertaken over several nights during the harvesting season. Tractors are operating pretty much daily over the growing season. These activities will inevitably create tensions with residential neighbours should the subdivision proceed.
3. **Change in the Character of Blinks Lane** – Blinks lane is the only access to the vineyard and is utilised by farm machinery tractors/harvesters and trucks at all times of the day and night. This in itself is likely to create **reverse sensitivity** issues if the character of the street changes to an essentially residential street. There are **safety concerns** for other users when this sort of traffic is using a residential street and we would have concerns about the **continued viability of access** for farm machinery/harvesters and trucks if this street becomes more residential in nature with increased residential vehicle movements.
4. **Geotechnical Concerns** – in light of events in Christchurch and more recently in Seddon we have concerns about the wisdom of developing closer to a known fault line. The Geotech report commissioned highlights that the Wairau Fault (which passes through our vineyard) ***“is capable of rupturing in earthquakes of characteristic magnitude 7.1 to 7.6, and horizontal surface displacements of 5 to 7m...”*** This fault is less than 500m from the northwest of the proposed area 4. Additionally the report highlights that ***“there is a moderate to high likelihood of a surface rupturing earthquake on the Wairau Fault in the next 50 -100 years.”***

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

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	Fax	Mobile	274,865,228
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(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date
			10/08/2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

All land North of Old Renwick Rd. Plan changes 64-65- 67-68

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

I strongly object to some of New Zealand's most productive soils being lost forever to building sites. My property neighbors some of this land so I know what can be produced from it.
There are far better sites to build on, such as the Burleigh area or Renwick.
Has any effort been made to find another site for Omaka Airport as this would make a large area available for development

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

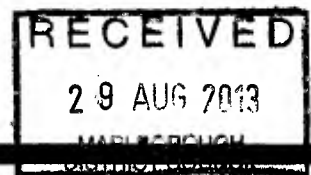
Abandon this plan change and put more effort into finding other sites as suggested above.
Try listening to local opinion instead of Auckland advisors who do not understand local concerns.

Continue on a separate sheet if necessary

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)
Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

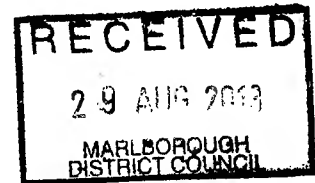
Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496
Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

Blicks lane - Changing use of land.



Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

We oppose it

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

No change for Blicks lane

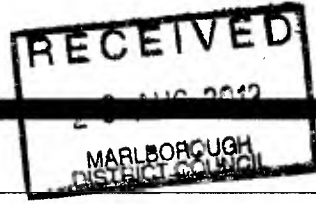
Continue on a separate sheet if necessary

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**

Submissions close 5.00 pm 30 August 2013



1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

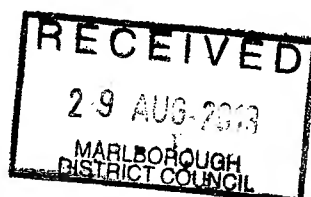
Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

As a long term resident I wish to make these revelant points

- ① Wasted use of the most fertile land in Marlborough.
- ② Blesheim has always been attractive because of its rural atmosphere and has prospered because of this. Surely a pity to ruin something special like Blicks Lane.
- ③ - We have a strong community feel in our street and it is nicely balanced with a mix of old and young.
- ④ - All of us use our land productively and look after it for future generations.
- ⑤ - Springlands was given that name for a reason and I'm not sure that given a large earthquake we wouldn't have a liquefaction problem and have learnt recently we have the main Wairau fault line $\frac{1}{2}$ a km from Blicks Lane.

We think our lane is special and in a changing world it is good to keep some things that are special.



5. The specific parts of the proposed plan change the submission relates to are as follows:

I disagree with the proposed plan change, with regard to Blicks lane.

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

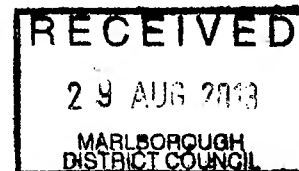
Please see letter attached

P.T.O.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

to leave our lane as it is,



Continue on a separate sheet if necessary

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

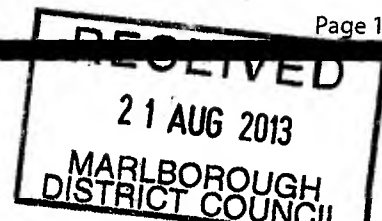
4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

All parts of the proposed plan change

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

I oppose the proposed plan change in its entirety
see attached explanation

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

Is To leave the land in its current form use

Continue on a separate sheet if necessary

Additional explanation and reason for opposing plan change 67

- (1) It provides for urban development to sprawl onto some of the most highly productive land on the wairau plains, which should be preserved for food production
- (2) The land also has a high water table which makes it more expensive to develop for Residential purposes possibly requiring more pumping stations.
- (3) Its proximity (300to 400m) from the Wairau fault line.
- (4) The probability of serious damage to buildings and infrastructure in the event of an earthquake of similar size (7.1 magnitude) or greater than the September 4th 2010 that struck Canterbury may not be able to be repaired or would be extremely costly.

This submission to be expanded on at the hearing.

Mark Caldwell-8225

From: Tony Orman [boto@slingshot.co.nz]

Sent: Friday, 30 August 2013 1:57 p.m.

To: Plan Change Urban Growth

Subject: Submission

watere Resource Management Plan

with sound town planning practice and as proposed by consultants UrbanPlus and shortsightedly adopted by the Marlborough District Council, to make the way by plan changes for Blenheim to expand to the north and west over the region's best productive land.

proposal. Public debate has shown community concern about the idea.

s and appendices show the land designated by proposals for urban growth is highly productive land which has been valuable for cropping, horticulture and pasture in the past. Landcare Research work has highlighted the folly of allowing urban sprawl to absorb highly productive land. In Marlborough much of Blenheim has been built on productive fertile alluvium. It must stop now. There are other options such as the lower Wither Hills and Taylor Pass area to make attractive residential development without swallowing up the best soils.

The costs of sewage and storm water etc on such level land will be a further burden on ratepayers.

Likely world wide shortages of food allied with disruption by political unrest, means productive lands must be retained as rural and for production for future generations.

Tom Harrison BEM
Former Marlborough mayor

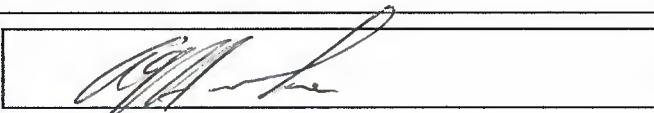
Ph 578 1297

**Submission on Plan Change 64 -
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan**

Submissions close 5.00 pm 30 August 2013



1. Submitter Details

Full Name	Anthony John Hawke		
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	27 Thomsons Ford Road		
	RD 2		
	Blenheim	Post Code	7027
Email	tony@gilberthaymes.co.nz		
Telephone	Business	Home	
	Fax	Mobile	
Address for Service	Gilbert Haymes & Associates Ltd (Tony Hawke)		
(if different from above)	P O Box 380		
	Blenheim - Attention: A J Hawke	Post Code	7024
Signature (of submitter or person authorised to sign on behalf of submitter)		Date	30/08/2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

See Attached

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

Support the plan change to allow for additional areas for residential development.

See Attached

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

See Attached

Continue on a separate sheet if necessary

SUBMISSION

MARLBOROUGH DISTRICT COUNCIL - PLAN CHANGE 64

Overview (p4):

The Overview states that, "Council's intention is that the rating status of the land within the Plan Change areas will not change until actual development occurs".

The submitter considers this as an open statement, and wants certainty that the rating status will not change until actual development occurs on their property, therefore, confirmation from Council that it relates to development on individual properties, and not when development starts in a specific Plan Change area.

5.8 Plan Change 71 – Chapter 23 Subdivision and Development:

Policy 1.8 – "Where indicative roading layouts are shown on the planning maps, the roading network proposed at the time of subdivision development shall be in general accordance with the layout".

The indicative location of the road off the western side of Thomsons Ford Road, is not practical as it bisects two property boundaries. It is unlikely that the property on the southern side of the proposed road will be further subdivided because of the restriction of the transmission line running through this property. The indicative road position needs to be moved further north so it is located within one property.

Is compensation to be paid where a developer is not getting the full potential use of a road through their property because of the indicative roading layout

Appendix 5 – Essential Street Connections:

In 1.1 Introduction, the proposed road design is based on one firm of planners' ideas, ie Urbanismplus. The rationale behind street designs has evolved over the years, where the initial towns within New Zealand were laid out in a grid pattern, followed by curved streets, and cul-de-sacs. Street layout design has reverted back to more of a grid pattern. What design will next be in vogue?

Along with this new thinking, there seems to be a trend to avoid rear allotments where no reason is stated in the assessment. It is interesting to note that Council's subdivision at Forest Park is continuing to be developed with a large number of rear allotments, and it seems rather hypocritical that Council are prepared to put rear allotments in place for their subdivisions, as it allows for a cheaper roading layout, while insisting on private land owners adopting a more expensive roading pattern.

It is also to be noted that new subdivisions within the Auckland area are adopting a mixture of a more intensive roading pattern, road curves and cul-de-sacs, generally to match the topography. Alternative road location options should be left available to developers.

**Appendix 6 – Blenheim Urban Growth Division of Infrastructure – Proposed Plan Changes
64-71:**

This section is brief in content, but alludes to the fact that an “accepted services plan” is to be drawn up by Council to establish the infrastructure requirements for the various Plan Change areas.

The submitter is concerned with the lack of content within this section to be able to make valued comments, and that consultation with the land owners may be overlooked in the formulation of this plan. For example, the plan indicates that “roads will vary in width and design, depending on their role for the wider area, rather than what would be built just for a small area on its own”.

Will the land owner that is required to construct a wider road carriageway be compensated for the additional costs to build the larger road?

In areas 2 and 4, it is noted that stormwater retention areas are proposed, however, there is no indication as to what form these retention areas will take, or how compensation will be formulated for the land owners on which these retention areas are located.

It is the submitter’s concern that the plans within this Appendix will be adopted without formal consultation with potentially affected land owners, and therefore, we wish for a confirmation from Council stating that these services plans are indicative only, and further consultation with land owners will be undertaken, formulating compensation etc prior to implementing infrastructural changes.

Relief sought, that Appendix 6 be withdrawn from this document and a more complete assessment be made available for submissions when completed.

Submission on Plan Change 64 - Blenheim Growth Area One - Rezoning to the Wairau/Awatere Resource Management Plan



MARLBOROUGH
DISTRICT COUNCIL

RECEIVED

30 AUG 2013

MARLBOROUGH
DISTRICT COUNCIL

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Peter Graham James and Maryanne Therese James		
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	38 Old Renwick Road		
	Blenheim		
		Post Code	7 0 2 0
Email	tony@gilberthaymes.co.nz		
Telephone	Business	Home	
	Fax	Mobile	
Address for Service	Gilbert Haymes & Associates Ltd (Tony Hawke)		
(if different from above)	P O Box 380		
	Blenheim - Attention: A J Hawke		Post Code 7 0 2 4
Signature (of submitter or person authorised to sign on behalf of submitter)			Date 30/08/2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

See Attached

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

See Attached

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

See Attached

Continue on a separate sheet if necessary

SUBMISSION

MARLBOROUGH DISTRICT COUNCIL - PLAN CHANGE 64

The submitter supports Council in the rezoning of land to allow for future Urban Residential Development.

Overview (p4):

The Overview states that, “Council’s intention is that the rating status of the land within the Plan Change areas will not change until actual development occurs”.

The submitter considers this as an open statement, and wants certainty that the rating status will not change until actual development occurs on their property, therefore, confirmation from Council that it relates to development on individual properties, and not when development starts in a specific Plan Change area.

3.8 Growth Area 5 (Plan Change 68) – page 26:

The description of the adjoining land to this area is not strictly correct. It states that “the land adjoining to the south has Urban Residential 2 zoning on the opposite side of Old Renwick Road”, when in fact, part of the land on the southern side of Old Renwick Road is the Racecourse, which has a Rural 3 zoning.

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

The submitter requests that this land be zoned ‘Large Lot Residential’, with a minimum allotment area of 3000m², and with a deferred Residential 2 zoning subject to more land stability tests being undertaken. If the land (or parts of) proves suitable for Residential 2 zoning it should be zoned as such.

5.8 Plan Change 71 – Chapter 23 Subdivision and Development:

Policy 1.8 – “Where indicative roading layouts are shown on the planning maps, the roading network proposed at the time of subdivision development shall be in general accordance with the layout”.

In the commentary to Plan Change 68 it has already highlighted that roading into the proposed Residential 2 zoned area is quite restrictive, and the indicative road layout from Old Renwick Road is over a strip of land owned by a landowner whose properties are not being re-zoned, therefore, may not be interested in allowing a new road over that property. The alternative road location off Old Renwick Road will be through land to remain Rural 3, which would make that option costs prohibitive if the land adjoining that portion of road cannot be developed more intensively.

The decision sought is that the indicative road layout within Plan Change 68 be reconsidered if Large Lot Residential or Residential 2 zoning is not achievable over the land currently to remain zoned as Rural 3.

Page 48 weighs up the benefit / costs to implement Policy 1.8 which states, “requires developer to comply with specified layouts which may not be the most economic for individual developers”.

Is compensation to be paid where a developer is not getting the full potential use of a road through their property because of the indicative roading layout?

Appendix 4 – Opus Geotechnical Evaluation:

Sec 5.5.4- Liquefaction Induced Ground Damage- In this section the author makes comment on lateral spreading in the vicinity of free surfaces such as water courses “Lateral spreading can extend to 200m or more from water courses but typically more severe nearer the river”. It goes on outline the experience from Darfield and Christchurch earthquakes, which “shows the ground damage due to lateral spreading reduces at a distance greater than 130m from a river or stream”.

Figure 3 shows the study areas and the proximity to nearby rivers and streams, with waterway buffer areas set aside at various intervals from those identified features.

The submitters property fronts Casey’s Creek and an area 200m north of the creek has been excluded from the residential zone because of potential lateral spreading, without a significant amount of ground testing being undertaken. Further an area of land adjoining Waipuna Street has been included within the residential zone when it is within 200m of the Opawa River. Where is the consistency in Councils reasoning? Why have Council chosen the 200m distance from the creek?

Sec 6.6.2- Liquefaction-Induced Ground Damage, states that the development areas are “underlain by alluvial gravel soils with only thin deposits of loose sand and silt layers overlying the gravels. Liquefaction of these sands and silts can occur in modest earthquake events which are used for design of normal buildings”.

An area of land in the northeastern part of Area Na:Nb has been identified as susceptible to liquefaction and lateral spreading, stating “these areas subject to liquefaction and natural spreading can be used for less intensive land uses such as parks and gardens or agriculture. This could be achieved by appropriate zoning of the land through district planning measures”.

The submitter considers that the ground testing undertaken in this area is incomplete, and intends to undertake further testing to gain a clearer picture of the land profile, with the aim of identifying land within this area as suitable for residential use (see attached letter from Davidson Group, who have been engaged to give an opinion on the findings of the Opus report along with additional soil testing). Following the recent earthquakes in Seddon it appears that the soils in this area reacted differently to the Christchurch soil types? Was this a modest earthquake event?

Outcome sought: Additional testing be undertaken in the area shown to have potential for lateral spread so that a more reasoned decision can be made as to an acceptable distance from Casey’s Creek where residential development can take place.

Appendix 5 – Essential Street Connections:

In 1.1 Introduction, the proposed road design is based on one firm of planners' ideas, ie Urbanismplus. The rationale behind street designs has evolved over the years, where the initial towns within New Zealand were laid out in a grid pattern, followed by curved streets, and cul-de-sacs, and latterly, curves and cul-de-sacs. Design has now reverted back to more of a grid pattern for various reasons. What design will next be in vogue?

Along with this new thinking, there seems to be a trend to avoid rear allotments where no reason is stated in the assessment. It is interesting to note that Council's subdivision at Forest Park is continuing to be developed with a large number of rear allotments, and it seems rather hypocritical that Council are prepared to put rear allotments in place for their subdivisions, as it allows for a cheaper roading layout, while insisting on private land owners adopting a more expensive roading pattern.

It is also to be noted that new subdivisions within the Auckland area are adopting a mixture of a more intensive roading pattern, road curves and cul-de-sacs, generally to match the topography. Alternative road location options should be left available to developers.

Appendix 6 – Blenheim Urban Growth Division of Infrastructure – Proposed Plan Changes 64-71:

This section is brief in content, but alludes to the fact that an "accepted services plan" is to be drawn up by Council to establish the infrastructure requirements for the various Plan Change areas.

The submitter is concerned with the lack of content within this section, and that consultation with the land owner may be overlooked in the formulation of this plan. For example, the plan indicates that "roads will vary in width and design, depending on their role for the wider area, rather than what would be built just for a small area on its own".

Will the land owner that is required to construct a wider road carriageway be compensated for the additional costs to build the larger road?

It is the submitter's concern that the plans within this Appendix will be adopted without formal consultation with potentially affected land owners, and therefore, we wish for a confirmation from Council stating that these services plans are indicative only, and further consultation with land owners will be undertaken, formulating compensation etc prior to implementing infrastructural changes.

Our Ref: 25356

30 August 2013

PG and MT James Family Trust
C/- P O Box 776
BLenheim 7240

ATTN: Mr P James

re: **ENGINEERING REVIEW OF LAND STABILITY, 38 OLD RENWICK ROAD, BLENHEIM**

We refer to our discussions to date and our desktop review of existing subsurface information relevant to your land, being Lots 6 and 7 DP 3536 on the north side of Old Renwick Road opposite the Blenheim racecourse.

You are obviously concerned about the risks that have been publicly expressed surrounding liquefaction and lateral spread issues and how these may pertain to your land. The Opus work commissioned by Council provides general guidance on such issues but cannot be said to be site-specific in terms of the lateral spread hazard at your property.

To date we have reviewed the Opus reports and results as made publicly available by Council following the Blenheim Urban Growth Study Stage 2 investigations, together with well logs from your property and nearby. The results are variable, and, significantly, show that the 'best' ground is adjacent to Caseys Creek (Opus BH 115) at the property immediately to the east of you. The Opus liquefaction assessment indicated susceptible soils at typically 2 to 4 metres below ground level (i.e. a shallow thin layer) and small amounts of settlement in a large seismic event. Those suspect soils below the water table do not appear in BH 115.

We have developed the following methodology for the next stage of geotechnical assessment of the lateral spread risk associated with Caseys Creek.

- (i) A grid of test pits for investigation of the shallow soils within 100 m of Caseys Creek to determine if shallow suspect soils exist.
- (ii) Take samples for laboratory testing and have analysed for liquefaction parameters.
- (iii) Plot soils information and results onto surveyed cross sections.
- (iv) Form an opinion on the liquefaction and lateral spread risk and determine what further testing and/or specialist advice may be appropriate.



Davidson Ayson House, 4 Nelson St
PO Box 256, Blenheim 7240, NZ
T: 03 579 2099 / F: 03 578 7028
E: service@DavidsonGroup.co.nz
W: DavidsonGroup.co.nz

Principals

Ross Davis, BE, CPEng, MIPENZ
Stephen Sheat, BE, CPEng, MIPENZ
Leigh McGlynn, BE, CPEng, MIPENZ

The ultimate outcomes from this process may include the determination of a suitable setback distance for buildings, and/or recommendations for resilient types of foundations and structures, and/or consideration of physical treatments to reduce or eliminate the risk itself. The potential value of the land for residential sections may justify substantial works and hence a large portion of the land in the vicinity of the waterway could foreseeably be or be made suitable for housing.

Thank you for involving us in your project and we look forward to being of assistance.

DAVIDSON GROUP LTD



R W Davis

RWD:LM

COPY TO: Gilbert Haymes & Associates Ltd
P O Box 380
BLenheim 7240

ATTN: Mr T Hawke

**Submission on Plan Change 66 -
Blenheim Growth Area Three - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name H. E. F and C. M. T. JONES

Organisation (if applicable)

Contact Person (if applicable) C. M. T. JONES

Postal Address 183 OLD RENWICK ROAD
BLenheim

Post Code 7272

Email

Telephone Business Home

Fax Mobile

Address for Service ANGELA JONES
(if different from above) 123 DAVID STREET
BLenheim

Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) X C.M.T. Jones Date 25.8.2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

THE ENTIRE PLAN CHANGES
NUMBERS 65 TO 71

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

OUR PROPERTY IS INCLUDED IN COUNCIL PROPERTY
NUMBERS 255317; 186909; 255918. IT IS DESCRIBED
AS LOTS 1 AND LOTS 2 D.P. 321132
OUR PROPERTY IS SHOWN IN PLAN CHANGE
AREA 66. WE SUPPORT THE PROPOSED PLAN
CHANGE SUBJECT TO THE CONDITION NOTED
UNDER QUESTION 7.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

COUNCIL TO APPROVE THE PLAN CHANGE
SUBJECT TO NO RESIDENTIAL TYPE RATING
TO BE IMPOSED UNTIL AND UNLESS WE
DEVELOP OUR LAND FOR RESIDENTIAL
SUBDIVISION.

Continue on a separate sheet if necessary

Submission on Plan Changes 64 to 71
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496
Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

Kapiti Views Trust

[Mr J Marris as Trustee]

Submissions on Plan Changes 64 to 71 continued.

The same submissions have been made to each of Plan Changes 64 to 71

5. The specific parts of the proposed plan change the submission relates to are as follows:

Each of the Plan Changes 64 to 71 in their entirety.

6. My submission is:

- i. That we oppose the development of the land to the north of Blenheim for residential use as proposed in Plan Changes 64, 65, 67 and 68 as it is an inappropriate land use. The land is part of the highly productive versatile soil resource which is a finite resource.
- ii. Rezoning will have effects on adjoining land in terms of reverse sensitivity of residential activities and likely consequential restrictions on existing lawful rural activities.
- iii. Rezoning this land is not efficient or capable of giving effect to the Marlborough District Council responsibilities for District Planning in terms of the Resource Management Act 1991 [the Act].
- iv. The evaluation of this land for residential use is inadequate and incomplete. The risks associated with the use of this land for residential activity are such that it should not be utilised without properly investigating, eliminating, avoiding or mitigating those risks.
- v. The economic costs associated with the use and the cost of development in terms of opportunity cost and development of this land do not justify its use for residential purposes as it is not economically efficient or viable.
- vi. The evaluation of alternatives is incomplete and inadequate and should have focused on land that is less productive and which can accommodate the change.

- vii. It is considered that Plan Changes 64, 65, 67 and 68 will not be able to deliver new residential land in a timely or cost effective manner to meet demand. The reason for this is due to fragmented ownership, lack of and cost of infrastructure along with basic unsustainability.
- viii. Furthermore, it is considered that the various servicing constraints/costs and geotechnical risks will cause the resultant sections to be unaffordable to the bulk of the population.
- ix. The feasibility of developing residential sections on this basis is considered to be expensive. The Council's own assessment of the zone levies for each of the development areas (dated 27 June 2013 -see **attached**) shows that the levy per lot ranges from \$23,600 to \$28,700, compared to \$12,773 for the Council's subdivision in southern Blenheim. This excludes the Development Contributions of approximately \$22,500 per lot, land costs, design costs, engineering assessment costs, construction costs and other professional fees. Even if developed, it is considered highly likely that the sections developed will be tagged with consent notices identifying the risks of liquefaction – which is likely to impact on insurance and costs.
- x. The Plan Changes significantly downplay the adverse effects associated with the loss of high quality and versatile soils. The Plan Changes state that these effects are inevitable; despite the fact the areas south, southwest and west of Blenheim do not contain versatile soils. See Appendix 9. The Plan Changes state that in many cases the future use of the soils for food production has already been compromised and that the loss is only 2.18% (209.6ha) of the versatile soils in the Rural 3 zone. The Plan Changes state that many of the parcels are in smaller holdings of less than 2 hectares (Appendix 9) No mitigation measures are proposed. Furthermore, as set out under 1(d) below, the proposed Plan Changes also significantly downplay the impact of the rezoning on existing highly productive activities both within the Plan Change areas and outside of them. Many existing highly productive activities will find themselves a lot closer to residential activities than they do currently. The loss of highly productive land is a significant resource management issue to this Region and also a key “assessment principle” clearly downplayed.

- xii. The Plan Change if approved will result in the expansion of residential land immediately adjacent to productive farmed land and / or industrial land. There is no apparent scope for an urban – rural interface to allow for a progression from urban to rural residential to rural that is effective in preventing or mitigating reverse sensitivity issues.
- xiii. Further if the Plan Change proceeds as proposed and a new 'line in the sand' is created for residential expansion then it will only be a matter of time before landowners on rural land adjacent to the newly zoned and developed residential land seek to subdivide and create rural residential allotments. This form of incremental creep will result in a further loss of productive land.
- xiv. The Plan Change is fundamentally flawed in not providing for a urban – rural interface.
- xv. We oppose Plan Change 71 as we consider that any area to be zoned should have been assessed prior to rather than post rezoning in respect to suitability for foundations. The testing proposed will be most expensive and covers all of the Plan Change areas. Plan Change 71 may also impact on the provision of services, especially in high water table areas such as in proposed plan change areas 64, 65, 67 and 68.
- xvi. The Plan Change documents are very clear about the urgent need to make provision for new land for residential growth which is agreed.
- xvii. For this reason and this reason alone we support the inclusion of Plan Changes 66, 69 and 70 in part. This land is in close proximity to the present town and has adjoining supporting services. It has been subject to substantial engineering and geo technical evaluation and is proven suitable for development. The Plan Changes state that current vacant residential land is only able to meet a short supply of 2-5 years. The EMS report on Residential Availability recommends "urgent action" is undertaken to address this shortage. Beyond that, approximately 1,500 new sections are reportedly required to the year 2031.

- xvii. The Trust contends that land to the west, southwest and south of Blenheim on less versatile soils is available at a lower cost per section to develop. Use of this land for residential purposes will at least mitigate the expansion on to the more versatile soils of the northwest of Blenheim as proposed in Plan Changes 66, 69 and 70.
- xviii. Furthermore in terms of affordability, the Plan Change states:

“Land availability has also been a key focus for recent central government initiatives to improve the affordability of housing. Under this scenario the provision of sufficient appropriately zoned land is intended to ensure section prices are not inflated by a shortage of suitable land”.
- xix. In regard to reverse sensitivity the Plan Changes, specifically Plan Change 69, fundamentally ignore existing business activities on land adjacent to proposed residential development (including, in particular the operation of a PAK'nSAVE food warehouse within the Westwood retail area).
- xx. The Plan Changes do not properly recognise or provide for potential reverse sensitivity effects that could arise from enabling residential activity to establish in close proximity to existing food warehouse operation. To that extent, Plan Change 69 fails to control the potential effects of the use of the subject land for residential purposes as an appropriate interface has not been achieved with complementary rezoning of adjoining land, to achieve integrated management in inter-zonal situations such as this.
- xxi. They fail to achieve the integrated management of the effects of use, development or protection of land and associated natural and physical resources of the District as required by section 31 of the Act;
- xxii. They fail to meet the requirements of section 32 of the Act, in that the proposed policies and rules are not the most appropriate method for achieving the Act's purpose nor are they the most efficient and effective means for achieving the District Plan's objectives;
- xxiii. The Changes will not assist the Council to carry out its statutory functions in order to achieve the purpose of the Act.

7. The decision I seek from Council is:

- i. To reject [or place on hold pending a wider District Plan review] the Plan Changes proposed for Plan Changes 64, 65, 67 and 68.
- ii. To properly investigate alternatives including the land to the south, west and southwest or other location on soils of lower value and less versatility which can be affordably and efficiently developed.
- iii. To reject or modify Plan Change 71 to give effect to this submission.
- iv. To support, in part, the plan changes proposed for Plan Changes 66, 69 and 70.
- v. To recognise and promote sustainable solutions to the problem of the shortage of residential land.
- vi. Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan that address the matters raised by Foodstuffs and Outer Limits [in their submissions] and reverse sensitivities of other business's and activities likely to be effected by the Plan Changes.

Development Contributions (DC's)

Development contributions pay for upgrade requirements based on capacity.
 Eg. As land within the urban areas is developed, capacity supplies across the local network are required.

Development Contributions (DC's)

DC's are assessed on a household equivalent use (HEU's)
 Eg. 2 units on one lot (cross street) equals 2 DC's

Category	Amount
• Sewerage	\$1,100
• Stormwater	\$650
• Water	\$1,250
• Community	\$2,800
• Reserves	\$50,130 (22% of total)
• Total	\$25,550

Therefore, they contribute \$11,450 (45%) to the network.

Zone Levies (ZL's)

Zone Levies provide for the cost to connect a new area to the existing infrastructure.
 These costs can occur within the new zone and adjacent to the new zone.
 The levies provide for work within the network that would not be required if development of the adjacent area was not occurring.
 Without levies there would be very poor connectivity and inefficient infrastructure.
 The costs are calculated on a per hectare basis.

SEWER

WATER

Multi vs Single land ownership

Council coordinates and manages multi-ownership developments to achieve an efficient and cost effective infrastructure installation to downstream customers to the benefit of the upstream landowner.

Zone levies provide a proportional share of infrastructure costs when land is in multiple ownership.
 A = 10 lots - 60% • B = 20 lots - 20% • C = 170 lots - 15% = Total 100% (levies are not cost-recovered proportionally)

If the land is in single ownership then all of the infrastructure costs are the responsibility of the land owner.

Area Assessments

The levy amount is directly related to the cost of infrastructure necessary to service an area efficiently.
 The levy varies due to the individual requirements for each area.
 The levy range for the proposed plan change areas is \$29,603 – \$28,656 per lot.
 The average levy for the proposed areas is \$25,991 per lot.
 The estimated zone levy for Betty's Road is \$16,893 per lot.
 Equivalent costs for Council's suburban divisions on Taylor street developments are \$12,773 per lot.
 It is noted that the proposed plan change areas are located on a development - 15% grade south coast.
 Total zone levy costs for the plan change areas is \$42.5 M.

Points of Note -DC Review

February 2013 - Discussion Paper - DIA


- DC's are one of a number of ways for TAs to fund the capital cost of infrastructure - others include rates, financial contributions under the RMA, user charges or central government grants and funding assistance.
- DC's and levies have the purpose of recouping some of the capital costs incurred by a TA when building or expanding the capacity of infrastructure that is needed to serve a new development.
- Properly structured DC approaches promote efficient use of infrastructure and fund by reflecting the true cost of developing a particular area due to geographical characteristics - this will affect land value.
- DC's discourage inefficient, poorly integrated and poorly coordinated development by reflecting true costs of "spraw" developments.
- The ideal DC approach requires detailed calculations of existing and future demands on each infrastructure type on a development by development basis, fully considering costs and benefits to multiple parties.

Discussion

Proposed areas and exclusions
 Costs centres for subdivision
 Development Contributions and
 Zone Levies
 Examples

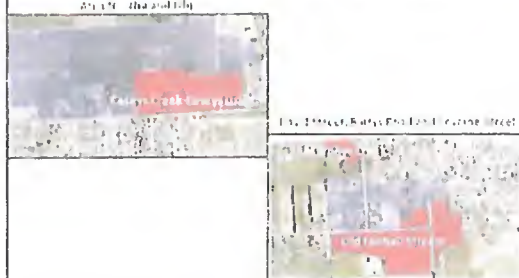
Background

- 2009 - South Marlborough Urban Growth Strategy (SMUGS) commenced as part of Growing Marlborough Strategy
- 2010 - Land identified in the East for growth areas E1, E2 and SF
- 2011 - Christchurch earthquakes prompted soil testing
- 2012 - Results identified the land in the east as unsuitable
- 2012 - Revised growth strategy identified areas in the west and north
- 2013 - Geotechnical testing confirmed suitable areas
- 2013 - Growing Marlborough Strategy released
- 2013 - Areas proposed for plan change 6A-7C to be rezoned from rural to residential




Exclusions - Area N (Na-Nb) and David Street

- Blue crossed area - Proposed Growth Area
- Red area - Removed due to geotechnical evaluation



7 Proposed Plan Change Areas - PC 64-71



Development Economics

The land subdivision process consists of a number of elements

- Land costs - determined by purchase price for developed land
- Design fees - Engineers, planners and consultants costs
- Construction costs - Pipes, poles, infrastructure - via tender
- Professional fees - Lawyers, Real Estate, etc
- Council fees -

Purpose

The purpose of Development Contributions and Zone Levies is to achieve financial equity between existing ratepayers and developers. They also ensure quality infrastructure with good connectivity is achieved.

Developers pay the proportionate capital expenditure costs of providing network and community infrastructure.

Definition

Development Contributions (DC's)
 Designed to recover Council expenditure in providing for growth.

Financial Contributions - Zone Levies (ZL's)
 Cover the costs of work within the zone and the cost of connecting to the wider Council network.

ZL's include an equal life apportionment of costs shared across a multi-developer area.

Submission on Plan Change 64 - 71 (whole lot)
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

Post Code

Email

Telephone Business Home

Fax Mobile

Address for Service

(if different from above)

Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

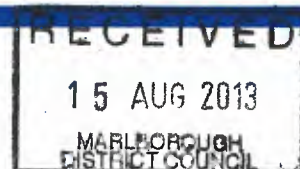
4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

All.

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

Absolute objection to all

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

To not use up good-fertile farmland,
for any other purpose,
Would suggest going east, follow-
ing on Witherlea foot hills,

Continue on a separate sheet if necessary



**Submission on Plan Change 64 -
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH
DISTRICT COUNCIL**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Murray Ian Locke and Carol Margaret Locke		
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	44 Old Renwick Road		
	Blenheim		
		Post Code	7020
Email	tony@gilberthaymes.co.nz		
Telephone	Business	Home	
	Fax	Mobile	
Address for Service	Gilbert Haymes & Associates Ltd (Tony Hawke)		
(if different from above)	P O Box 380		
	Blenheim - Attention: A J Hawke		Post Code 7024
Signature (of submitter or person authorised to sign on behalf of submitter)			Date 30/08/2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

See Attached

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

See Attached

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

See Attached

Continue on a separate sheet if necessary

SUBMISSION

MARLBOROUGH DISTRICT COUNCIL - PLAN CHANGE 64

The submitter supports Council in the rezoning of land to allow for future Urban Residential Development.

Overview (p4):

The Overview states that, “Council’s intention is that the rating status of the land within the Plan Change areas will not change until actual development occurs”.

The submitter considers this as an open statement, and wants certainty that the rating status will not change until actual development occurs on their property, therefore, confirmation from Council that it relates to development on individual properties, and not when development starts in a specific Plan Change area.

3.8 Growth Area 5 (Plan Change 68) – page 26:

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

The submitter requests that this land be zoned ‘Large Lot Residential’, with a minimum allotment area of 3000m², and with a deferred Residential 2 zoning subject to more land stability tests being undertaken. If the land (or parts of) proves suitable for Residential 2 zoning it should be zoned as such.

5.8 Plan Change 71 – Chapter 23 Subdivision and Development:

Policy 1.8 – “Where indicative roading layouts are shown on the planning maps, the roading network proposed at the time of subdivision development shall be in general accordance with the layout”.

Page 48 weighs up the benefit / costs to implement Policy 1.8 which states, “requires developer to comply with specified layouts which may not be the most economic for individual developers”.

Is compensation to be paid where a developer is not getting the full potential use of a road through their property because of the indicative roading layout?

Appendix 4 – Opus Geotechnical Evaluation:

Sec 5.5.4- Liquefaction Induced Ground Damage- In this section the author makes comment on lateral spreading in the vicinity of free surfaces such as water courses “Lateral spreading can extend to 200m or more from water courses but typically more severe nearer the river”. It goes on outline the experience from Darfield and Christchurch earthquakes, which “shows the ground damage due to lateral spreading reduces at a distance greater than 130m from a river or stream”.

Figure 3 shows the study areas and the proximity to nearby rivers and streams, with waterway buffer areas set aside at various intervals from those identified features.

The submitters property fronts Casey's Creek and an area 200m north of the creek has been excluded from the residential zone because of potential lateral spreading, without a significant amount of ground testing being undertaken. Further an area of land adjoining Waipuna Street has been included within the residential zone when it is within 200m of the Opawa River. Where is the consistency in Councils reasoning? Why have Council chosen the 200m distance from the creek?

Sec 6.6.2- Liquefaction-Induced Ground Damage, states that the development areas are "underlain by alluvial gravel soils with only thin deposits of loose sand and silt layers overlying the gravels. Liquefaction of these sands and silts can occur in modest earthquake events which are used for design of normal buildings".

An area of land in the northeastern part of Area Na:Nb has been identified as susceptible to liquefaction and lateral spreading, stating "these areas subject to liquefaction and natural spreading can be used for less intensive land uses such as parks and gardens or agriculture. This could be achieved by appropriate zoning of the land through district planning measures".

The submitter considers that the ground testing undertaken in this area is incomplete, and intends to undertake further testing to gain a clearer picture of the land profile, with the aim of identifying land within this area as suitable for residential use. Following the recent earthquakes in Seddon it appears that the soils in this area reacted differently to the Christchurch soil types? Was this a modest earthquake event?

Outcome sought: Additional testing be undertaken in the area shown to have potential for lateral spread so that a more reasoned decision can be made as to an acceptable distance from Casey's Creek where residential development can take place.

Appendix 5 – Essential Street Connections:

In 1.1 Introduction, the proposed road design is based on one firm of planners' ideas, ie Urbanismplus. The rationale behind street designs has evolved over the years, where the initial towns within New Zealand were laid out in a grid pattern, followed by curved streets, and cul-de-sacs, and latterly, curves and cul-de-sacs. Design has now reverted back to more of a grid pattern for various reasons. What design will next be in vogue?

Along with this new thinking, there seems to be a trend to avoid rear allotments where no reason is stated in the assessment. It is interesting to note that Council's subdivision at Forest Park is continuing to be developed with a large number of rear allotments, and it seems rather hypocritical that Council are prepared to put rear allotments in place for their subdivisions, as it allows for a cheaper roading layout, while insisting on private land owners adopting a more expensive roading pattern.

It is also to be noted that new subdivisions within the Auckland area are adopting a mixture of a more intensive roading pattern, road curves and cul-de-sacs, generally to match the topography. Alternative road location options should be left available to developers.

Appendix 6 – Blenheim Urban Growth Division of Infrastructure – Proposed Plan Changes 64-71:

This section is brief in content, but alludes to the fact that an “accepted services plan” is to be drawn up by Council to establish the infrastructure requirements for the various Plan Change areas.

The submitter is concerned with the lack of content within this section, and that consultation with the land owner may be overlooked in the formulation of this plan. For example, the plan indicates that “roads will vary in width and design, depending on their role for the wider area, rather than what would be built just for a small area on its own”.

Will the land owner that is required to construct a wider road carriageway be compensated for the additional costs to build the larger road?

The submitter also notes that west of his property Council proposes to pipe Casey’s Creek. Their house is situated approximately 5 metres from the bank of Casey’s Creek, and tree, landscaping and beautification of the creek has been undertaken in this locality. In addition, bird life, including tui, is prevalent in this section of the creek. Will all this work be undone with potential upgrading?

The submitter also notes that west of their property Council proposes to pipe Casey’s Creek. This will result in concentrated run-off from roof collection and hardstand areas, directed to this pipeline which will result in a more concentrated surge of water into Casey’s Creek. What effect will this have on the submitters land ?

It is the submitter’s concern that the plans within this Appendix will be adopted without formal consultation with potentially affected land owners, and therefore, we wish for a confirmation from Council stating that these services plans are indicative only, and further consultation with land owners will be undertaken, formulating compensation etc prior to implementing infrastructural changes.

Recommendation: Supply more information within Appendix 6 and put out for further public consultation.

Mark Caldwell-8225

From: Alison Mackenzie [alisonmackenzie@ruralinzone.net]

Sent: Saturday, 31 August 2013 7:59 a.m.

To: Plan Change Urban Growth

Subject: Submission

Submission on Proposed Plan Changes Wairau/Awatere Resource Management Plan

use of good intensive farmland for expanding Blenheim onto and in this case areas delineated as areas 64 to 69. To rezone this residential from rural would be a retrograde step. Blenheim's expansion should be on lesser fertile land. The areas 64 to 69 is highly productive rural land that has shown to be extremely fertile by its past cropping or horticulture.

High quality land needs protection as Marlborough's supply is limited. Given international unrest, likely to escalate, it could well be areas like Marlborough will depend more and more on local production. We have a duty to future generations to protect the best soils from urban sprawl.

Alison Mckenzie,
Waihopai Doiwns
R D 6
Blenheim
Ph 572 4411



To: Marlborough District Council

Submission on: Plan Changes 64-71 to the Wairau/Awatere Resource Management Plan – Blenheim Urban Growth Plan Changes

From: Marlborough Province of Federated Farmers of New Zealand

Date: 30 September 2013

Contact: Michael Bennett
Policy Advisor
Federated Farmers of New Zealand

PO Box 1992
Christchurch

P: 03 357 9452
M: 027 551 1629
E: mbennett@fedfarm.org.nz

Federated Farmers would like to be heard in support of this submission

DECISIONS SOUGHT

Note the support of Federated Farmers for the efforts of Marlborough District Council to achieve sustainable urban growth in and around Blenheim.

Note the overall concern of Federated Farmers over the loss of highly productive land to production arising from Proposed Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71.

Note that in case of any doubt, decisions sought in this submission apply to each of Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71 to the Wairau/Awatere Resource Management Plan.

Allow some urban development on areas prone to liquefaction to the east or southeast 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 that continues to come to be made available following the Christchurch earthquakes.

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

To prevent more the values of remaining highly productive land being compromised, include specific mechanisms to manage reverse sensitivity effects, including covenants on sections allocated near land that is intended to remain in primary production.

In making decisions on Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71, have regard to the current and future values of highly productive land to current and future generations, both within and outside Marlborough.

Take a balanced approach to future development and make provision for urban land development on land subject to liquefaction hazard or reverse sensitivity effects, hilly land to the south of Blenheim, as well as land having very high productive value.

Further evaluate alternative options to focussing all future urban development on highly productive land, with a view to a more balanced approach, including:

- Enabling development of land subject to reverse sensitivity effects, supported by mechanisms such as 'non-complaint' covenants;
- Allowing development in eastern areas subject to appropriate soil investigations, land remediation, and standards of construction; or
- Allowing urban development on the lower parts of the foothills to the south of Blenheim with appropriate protections for rural amenity values

Make appropriate consequential amendments in giving effect to our submissions.

**SUBMISSION TO MARLBOROUGH DISTRICT COUNCIL ON
PLAN CHANGES 64-71**

1. GENERAL SUBMISSIONS

- 1.1. Federated Farmers appreciates the opportunity to submit on Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71 to the Wairau/Awatere Resource Management Plan (The Plan Changes).
- 1.2. Federated Farmers supports the proactive approach being taken by Marlborough District Council to address anticipated problems with affordable housing by ensuring supply of land for urban development. We support in particular the proposition that there is limited time to address imminent problems with land supply and housing affordability in Blenheim.
- 1.3. Federated Farmers is also aware that Marlborough District Council faces many challenges in allocating land to enable further urban growth, including liquefaction and other natural hazards, reverse sensitivity effects, impact on utility and transport networks, and loss of highly productive land.
- 1.4. Despite our support, Federated Farmers is concerned that loss of highly productive land appears to have taken a lesser priority or weight to factors such as adverse effects of liquefaction hazard or reverse sensitivity effects, with the apparent result that the area proposed to be rezoned for urban development is entirely on highly productive land, some of which is recognised as the most fertile and productive land on the Wairau Plains.

Decisions sought

- 1.5. Note the support of Federated Farmers for the efforts of Marlborough District Council to achieve sustainable urban growth in and around Blenheim.
- 1.6. Note the overall concern of Federated Farmers over the loss of highly productive land to production arising from Proposed Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71.
- 1.7. Note that in case of any doubt, decisions sought in this submission apply to each of Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71 to the Wairau/Awatere Resource Management Plan.
- 1.8. Make appropriate consequential amendments in giving effect to our submission.

2. LIQUIFACTION AND OTHER EARTHQUAKE DAMAGE

- 2.1. The planners report notes at page 5 that *(as a consequence of an initial report) growth areas on the east of Blenheim were removed from the growth strategy due to the significant risk and likelihood of liquefaction in the event of an earthquake.* While a considered response to liquefaction hazard is appropriate, a balanced approach must be undertaken. The decision to exclude all areas east of Blenheim from future development does not appear to have been subject to the level of investigation that

underpinned the land classifications, which included five levels of risk with permanent exclusion of urban development only required in the most extreme cases. The Christchurch experience is that, 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.

- 2.2. Information included with the Plan Changes¹ indicates that while the undeveloped land to the eastern area of Blenheim is relatively lower lying, with ground characteristics that result some risk, ground conditions and likelihood of severe ground damage are highly variable across the subject area.
- 2.3. Furthermore the information included with the Plan Changes indicates that development within 'Area SE':
will be more costly because of high groundwater levels and the presence of liquefaction prone soils at shallow depth and the need to mitigate the effects of liquefaction and safeguard against subsidence and foundation failure
- 2.4. For example extensive areas of Christchurch are classified as TC3, and very likely to be subject to liquefaction in a significant ground shaking event. Other areas are identified as high risk, but are able to be built on following extensive remediation, as has occurred in Pegasus Town for example.
- 2.5. Overall, 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.

Decision Sought

- 2.6. Allow some urban development on areas prone to liquefaction to the east or southeast of Blenheim, subject to suitable standards of geotechnical testing, and if necessary, land remediation, and higher standards of construction.
- 2.7. Provide for on-going review of the acceptance framework for land development based on the Royal Commission report and other information that continues to come to be made available following the Christchurch earthquakes.

3. REVERSE SENSITIVITY EFFECTS

- 3.1. Federated Farmers acknowledges that reverse sensitivity effects are an important factor in the allocation of land for urban use. For example when the ability of farmers to carry out primary production activities is limited by the sensitivities of neighbours to spray, or to generate noise or odour. Reverse sensitivity effects can result in reduced productive capacity or versatility and further encroachment of subdivision on production land.
- 3.2. While the location of proposed areas for urban development appears to be designed in part to minimise problems with reverse sensitivity effects, placement of new urban areas will not prevent all reverse sensitivity effects and other options should also be

¹ Appendix 2 – Blenheim Urban Growth Study: Geological Evaluation at page 14

considered, including 'non nuisance complaint' covenants for new residential subdivision near areas used for primary production activities, including future activities.

- 3.3. An 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. This appears to have happened with potential reverse sensitivity effects on Omaka Aerodrome where urban development has been excluded from an area for the benefit of the users of this facility (who are few), regardless of the advantages of using this location, or overall appropriateness in terms of the purpose of sustainable management.

Decision Sought

- 3.4. Recognise that placement and design of subdivision is not the only mechanism to address reverse sensitivity effects and that other options are also available.
- 3.5. To prevent more the values of remaining highly productive land being compromised, include specific mechanisms to manage reverse sensitivity effects, including covenants on sections allocated near land that is intended to remain in primary production.

4. LOSS OF HIGHLY PRODUCTIVE LAND

- 4.1. The reports and appendices that accompany the plan changes show that the majority of land proposed to be rezoned for urban residential use is highly productive land that has supported cropping or horticulture in the past, and will be able to support high intensity food production in the future.

- 4.2. This information accords with anecdotal evidence from local farmers that the subject land is some of the most fertile and productive land on the Wairau Plains.

- 4.3. Recent studies² indicate that:

29% of the 25,000 hectares of new urban areas developed between 1990 and 2008 occurred on high class land. In Hawke's Bay and Marlborough a high proportion of urbanisation has occurred on high-class land (49% and 50% respectively). High quality land is defined as land capable of being used intensively to produce a wide variety of crops, including arable crops.

Federated Farmers accords with the view that high quality land deserves protection because it is limited in supply and underpins the welfare of future generations. Protecting high value land for the benefit of future generations also extends to people not living in New Zealand. Structural shifts in the prices of grains and dairy products, and civil disorder in some countries indicate that food shortages and consequent lack of affordable food is already an issue. Severe shortages of food are predicted to occur internationally, with widespread hardship and social disruption virtually inevitable in many countries.

2



4.4 In light of the worldwide shortage of food and consequent importance of highly productive land to the future of people both in Marlborough and elsewhere, Federated Farmers is of the view that the Plan Changes and the approach taken, with all future urban development is directed on to highly productive Class 1 and 2 land, does not achieve the purpose of sustainable management embodied in section 5 of the RMA.

Decision Sought

4.5 In making decisions on Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71, have regard to the current and future values of highly productive land to current and future generations, both within and outside Marlborough.

4.6 Take a balanced approach to future development and make provision for urban land development on land subject to liquefaction hazard or reverse sensitivity effects, hilly land to the south of Blenheim, as well as land having very high productive value.

4.7 Further evaluate alternative options to focussing all future urban development on highly productive land, with a view to a more balanced approach. Options include:

- Enabling development of land subject to reverse sensitivity effects, supported by mechanisms such as 'non-complaint' covenants;
- Allowing development in eastern areas subject to appropriate soil investigations, land remediation, and standards of construction; or
- Allowing urban development on the lower parts of the foothills to the south of Blenheim with appropriate protections for rural amenity values.

5 ABOUT FEDERATED FARMERS

5.4 The Marlborough Province of Federated Farmers welcomes the opportunity to submit on Plan Changes 64, 65, 66, 67, 68, 69, 70, and 71 to the Wairau/Awatere Resource Management Plan.

5.5 Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

5.6 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

5.6.1 Our members may operate their business in a fair and flexible commercial environment;

5.6.2 Our members' families and their staff have access to services essential to the needs of the rural community; and

5.6.3 Our members adopt responsible management and environmental practices.

5.7 This submission was developed in consultation with the members of Federated Farmers. It is important that this submission is not viewed as a single submission, but as a collective one, that represents the opinions and views of our members.

5.8 Federated Farmers acknowledges submissions from individual members of Federated Farmers.

Gary Barnett
Provincial President
Marlborough Province
Federated Farmers of New Zealand

Submission on Plan Change 64 - 71
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

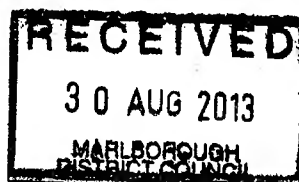
4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

See attached

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

See attached

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

See attached.

Continue on a separate sheet if necessary

Plan Changes 64 to 71

5. The Specific parts of the proposed plan changes the submission relates to are as follows:

The proposal to rezone the areas identified as Urban Residential 2 in PC 64 to PC 70 and the new provisions relating to subsoil investigations proposed in Plan Change 71.

6. My submission is:

We oppose plan changes 64, 65, 67 and 68 on the grounds that it is premature to be expanding the town onto these areas due to the following:

- It is land of exceptionally high versatility for the production of food.
- The area is more costly to bring into residential subdivision than potential other areas to the west, north west, south west and south of Blenheim
- The area has, in many parts, a high water table and can be affected by flooding.
- In the **Blenheim Urban Growth Study Report: Geotechnical Evaluation** the Opus Interpretive Report states on page 1.

*From a sustainability perspective, it would not be prudent to encourage development on land which will require considerable cost and consume substantially more resources compared to development in land which is more stable in earthquakes and other hazards. **This is on the basis that it would be more sustainable to develop areas to a lower level of hazard, such as the alluvial gravel plains west of Blenheim.** (My emphasis)*

- We submit that Council should not go to these plan change areas under these circumstances as first choices.

We oppose plan change 71 as we consider that any area to be re zoned should have been assessed prior to, not post rezoning in respect to suitability for foundations. The testing proposed will carry with it substantial costs. Appendix L covers the entire plan change area proposed.

If foundation variability is ascertained then this will also have an effect on the provision of services, in particular in areas with a high water table.

We support in part plan changes 66, 69 and 70.

We are aware that Council is fast running out of time but not land options.

If the areas above are suitable from a geotechnical view point then the above plan change areas should be considered due to their proximity to the existing town and services.

It is regrettable that changing this land use to residential use will swallow up land of high versatility. This should, however, be mitigated by Council considering land for rezoning to the west, southwest and south of Blenheim which is, significantly, of lower versatility rather than the highly versatile land to the north. This would also give the buying public choices between the lower lying areas of the northwest and the higher lands to the west, southwest and south of Blenheim.

The parts of plan Changes 66, 69 and 70 that we are opposed to are areas within these plan change zones where reverse sensitivities will clearly occur from existing businesses.

These areas need carefully planning and zone modification in buffering areas. We do not see this being addressed nor quantified in the proposed plan changes.

In the event that both the northwest and north plan change zones are approved then consideration will be needed for additional schooling capacity and possibly a new school.

7.The decision I seek from Council is:

That plan changes 64, 65, 67 and 68 be rejected in total.

That plan change 71 be rejected in total or alternatively modifications be made to the plan change that will ensure that infrastructure to service the zones is not installed until a full and satisfactory engineering report is undertaken that conclusively proves the zone is suited to development. Such report to cover off the general foundation requirements of the plan change zone.

That plan changes 66, 69 and 70 be accepted in part and that consideration of effects of reverse sensitivity be given to those areas within the above plan change areas from existing or planned businesses.

J. H. Mann
30th August 2013.

Mark Caldwell-8225

From: ralph.mason@farmside.co.nz
Sent: Friday, 30 August 2013 1:46 p.m.
To: Plan Change Urban Growth
Subject: Submission to Plan Changes of Wairau/Awatere Resource Management Plan

Importance: High

Submission to Plan Changes of Wairau/Awatere Resource Management Plan re Blenheim Urban Growth

I oppose the proposal to expand Blenheim to the north and west of its present boundaries using highly fertile productive soils as shown on areas 64 to 69 .

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

The Wairau Plains are limited in fertile soils thereby making alluvial loam in the areas 64 to 69 to be especially valuable. Marlborough's productive land needs to be safeguarded for present and future production.

There are other far better options that will not use the most fertile soils. That is to the south and west of Blenheim.

Signed

Ralph Mason
840 Avondale Road,
Waihopai Valley RD6,
Blenheim 7276
ralph.mason@farmside.co.nz

Submission on Plan Changes 64 to 71
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Kevin & Lynda Morgan		
Organisation (if applicable)	N/A		
Contact Person (if applicable)	Murray Hunt		
Postal Address	C/- Hardy-Jones Clark		
	PO Box 646		
	Blenheim	Post Code	
Email	murray@hjc.co.nz		
Telephone	Business 5785339	Home	
	Fax	Mobile	
Address for Service	as above		
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)		Date	30.8.2013

Submitter and duly authorised agent.

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

Kevin & Lynda Morgan
Submission on Plan Changes 64 -71 continued

5. The specific parts of the proposed plan change the submission relates to are as follows:

This submission relates to each of Plan Changes 64 to 71 inclusive but notes that a separate submission has been made for Plan Change 70 which has some unique aspects.

The submission relates to the whole of the Plan Changes.

6. My submission is:

Infrastructure and Risk

The planned infrastructure in particular roading has not been the subject of adequate consultation and the changes and development are dependent on the infrastructure. This should be resolved. For example indicative roading as shown on land that is not part of the change and to the extent it involves an area we own adjacent to Waipuna Street. We do not agree with roading in that location.

Reverse Sensitivity

The loss of highly productive land is a significant resource management issue to this Region and also a key "assessment principle" clearly downplayed.

With regard to the impacts of reverse sensitivity, the AEE submitted simply repeats the following for each of the separate urban growth / Plan Change areas:

We are landowners on Old Renwick Road. Our block is utilised for farming and viticulture. The lack of specific measures to deal with reverse sensitivity is a major shortcoming of the Plan Changes.

A combination of setbacks, buffers, reduced density of dwellings or other methods including in the new zones is necessary to preserve existing rights of rural users to continue to farm on adjoining and nearby land. The hazard identification process and the requirement to establish infrastructure as provided for in the indicative plan is not an appropriate or efficient method for ensuring that development proceeds in an ordered, efficient or sustainable way.

In the event that residential development does incrementally expand into Areas 1-7, there will be new residential dwellings constructed in areas or adjoining areas that are currently used for productive purposes or could be used productively in future. As a result, rural properties/activities currently setback well away from the Residential Zone will find themselves a lot closer. Given the presence of Class 1 and 2 soils to the west and north of existing urban boundaries, the actual impacts from reverse sensitivity are likely to be more significant than that assessed in the Plan Change. There is a real risk of incremental creep.

7. The decision I seek from Council is:


- (i) Reject the Plan Changes; or
- (ii) Defer the rezoning until the infrastructure and hazards issues are resolved so that there can be confidence the land will be able to be used for efficiently and effectively for residential development; or
- (iii) Utilise the status of deferred rezoning as a technique to ensure the orderly and efficient development of the areas in the Plan Changes; or
- (iv) Identify and provide for the methods to be adopted to minimise or eliminate the risk of reverse sensitivity with adjoining rural land and rural activities.
- (v) Identify and provide the methods for avoiding incremental creep of residential activity onto adjoining land by way of better defined boundaries areas of lower density at the urban/rural interface or similar.
- (vi) Such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies and rules of the District Plan.

**Submission on Plan Change 71 -
Blenheim Growth Area Plan Provisions
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Vicki Nalder			
Organisation (if applicable)	New Zealand Institute of Surveyors			
Contact Person (if applicable)	Vicki Nalder			
Postal Address	PO Box 186			
	Blenheim			
		Post Code	7 2 4 0	
Email	vicki.nalder@aurecongroup.com			
Telephone	Business	5206068	Home	
	Fax	5789983	Mobile	
Address for Service				
(if different from above)				
		Post Code		
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	30/08/13

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

See attached

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

See attached

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

See Attached

Continue on a separate sheet if necessary

Submission on Plan Change 64-71 by the NZIS Nelson Marlborough Branch

The NZIS support the Council in the rezoning of land to allow for future Urban Residential Development. Land availability for urban development has diminished markedly over the last 6 years. Private Plan Changes have not been encouraged by Council in the past, and generally they are an expensive and time consuming exercise with no certainty in outcome.

Therefore the implementation of Council initiated Plan Changes for opening up areas for future urban development is a positive initiative and well overdue.

Plan Change 64-70

The concerns that NZIS have are in relation to:

- Staging
- Servicing
- Costs

Under Section 3.2 there are broad statements on sequencing for the areas based on the cost effectiveness for the servicing. As stated by Council there are no Stormwater, water or sewage services in these areas at all.

Appendix 6 shows the extent of the upgrades required before any one stage can be developed. What will triggers the upgrades required for all services? and who pays initially if one of the five owners say in Area One wants to develop and the others don't?

It would be beneficial to see the "Accepted Services Plan" now because that will have implications on individual land owners. On whose property will the proposed retention ponds be? Which properties will need to feed into them? How are the land owners compensated if they have the pond on their land for the benefit of others?

Will Council coordinate all the servicing and be "banker" as suggested. How far does this roll go? The proposal to address all the servicing issues as a whole is to be commended and realistically is the only way forward. However looking at the very basic information and plans in Appendix 6 it stands out that "lots of developers money" will need to be found before we ever see a section sold.

Recommendation:

The workability and Practicality of the "Accepted Services layout Plan" needs to be considered from a Commercial aspect, and be viable to the Public for comment as part of this process. There need to be some costs available (Future development and Zone levy costs) to ensure that the Plan Change has not priced itself out of the Blenheim market before it begins.

It is not good enough to say the "market" will decide if the break even point is \$250,000 for a new section.

Plan Change 68

We are concerned about creating an island of Rural 3 land surrounded by residential land. This small pocket of land will be severely restricted as to the activities that can be carried out on it with a huge potential for reverse sensitivity issues.

Recommendation:

Either,

- large lot residential rather than rural zone for that island of rural land, or
- deferred residential status for that island of rural land, or
- exclude plan change 68 area from the consideration.

Plan Change 7129.1.4.2 Subsoil Investigations

The Geotech report that has been carried out to date by Opus provides an indication only of the soils in the area. It is by no means definitive, and there may well be variances over the extent of the proposed Plan Change areas. What is found on site may also govern locations of future services, roads and housing platforms.

The Resource Management Plan is not the place to include specific Geotech requirements. The reason is that as seen in Christchurch the testing regimes required alter monthly. The RM Plan can only be changed by a formal Plan Change and this can take years. Currently Christchurch refers to MBIE for Geotech requirements, and these can be updated relatively easily.

It is unclear whether Council deems there needs to be no assessment of future liquefaction or lateral spreading over all the Plan Change areas. Does this mean that Council accepts the Opus report (2011-2013) and are satisfied that there is no the risk. All that has to be dealt with is bearing capacity?

Recommendation:

Remove 29.1.4.2 reference to Testing and bearing capacity from the Resource Management Plan.

Roading Layouts

Whilst we agree that there need to be an overall strategy for the roading layout, we would hope that Council will exercise some discretion in the final locations.

The reason being that because of the number of small landowners within the Proposed Plan Change areas, more practical or suitable alternatives may be required.

Recommendation

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

We wished to be heard in relation to this submission

Contact:

Chairman of Nelson Marlborough Branch of NZIS

Vicki Nalder

Vicki.nalder@arecongroup.com

03 520 6068

Pursuant to Clause 6 of the First Schedule of the Resource Management Act 1991

Submissions on Proposed District Plan Changes 64-71 to the Wairau/Awatere Resource Management Plan

To: Environmental Policy Division
Marlborough District Council
PO Box 443
BLenheim 7240

From: NZ Transport Agency
PO Box 5084
Lambton Quay
WELLINGTON 6145

1. **The NZ Transport Agency (the Transport Agency) supports in part proposed plan changes 64 - 71 to the Wairau/Awatere Resource Management Plan.**

2. **The specific provisions of the plan change requests that the Transport Agency's submission relates to are as follows:**

The proposed plan changes in their entirety.

3. **The Transport Agency could not gain an advantage in trade competition through this submission.**

4. **The reasons for making this submission are:**

The Transport Agency's statutory responsibility

The Transport Agency is a Crown entity providing an integrated approach to transport planning, investment and delivery. The NZTA's statutory objective is to carry out its functions in a way which contribute to "an effective, efficient, and safe land transport system in the public interest."

When undertaking its functions the Transport Agency must give effect to the Government Policy Statement on Land Transport Funding (GPS) which directs the Transport Agency to seek the integration of land use planning, transport planning and infrastructure investment.

In particular the Transport Agency must promote the safe, effective and efficient function of the land transport system and seek to ensure that the land transport system is not adversely affected by land use development. The Transport Agency is also an investor in the Marlborough local road network and has an interest in ensuring that its investment in the local transport network (including State highway projects) is not compromised by existing and future land use development.

5. **Integrated Planning**

Integrated planning is essential to the Transport Agency in fulfilling its purpose under the Land Transport Management Act 2003 (LTMA) as it enables it, in partnership with others, to provide greater certainty for infrastructure planning and investment. The Transport Agency does this because integrated planning leads to

better management of environmental and social impacts and to improved transport efficiencies.

6. General Comments

In 2010 the Transport Agency provided feedback to Council on the proposed Urban Growth Strategy noting that Old Renwick Road should be the northern limit for urban growth and that it did not support urban growth north of this road.

Since the Canterbury earthquakes in 2010 and 2011 the Transport Agency understands that the Council has undertaken further ground testing and has found that the land to the north of Blenheim Township is the most suitable for urban growth with regard to ground conditions.

7. State Highway 6

The Integrated Transport Assessment (ITA) prepared by GHD recommends that a number of intersection improvements are required along the State Highway 6 (SH6) corridor to accommodate the proposed urban growth in northern Blenheim. This does cause some concern for the Transport Agency for two primary reasons; firstly they could compromise the through function of SH6 and secondly there is no justification as to why these improvements are needed.

SH 6 is classified as a Regional Strategic State Highway which are highways that contribute to the social and economic well being of a region and connect regionally significant ports or airports. They are also major connectors between regions.

The ITA recommends a number of significant intersection improvements along SH6 which may compromise the through function of the State highway. The Transport Agency would prefer to see network optimisation take place rather than adding additional capacity to the network. The Transport Agency considers that the network could accommodate the proposed urban growth without any significant improvements to the roading network.

The Transport Agency requests that further information be provided by Council to justify the need for these recommended roading improvements. The Transport Agency would like to review this information once it has been provided.

Once this information has been reviewed then there may be a need to develop monitoring and/or sequencing triggers. One way of doing this is through the provision of staging rules within the subdivision chapter of the District Plan which links the rate of development with any roading improvements.

Please be aware that if Council determines that any improvements are required to accommodate the proposed urban growth, then a funding plan will need to be developed which details how the costs of any improvements will be met. The Council should note that there is no guarantee of funding from the Transport Agency and that the Transport Agency expects that those who generate the need for roading improvements should contribute towards their costs.

8. Financial/Development Contributions

Given the number of proposed roading improvements and new local roads to service growth in this area then Council should ensure that developers are required to pay their fair share towards the infrastructure.

9. Limited Access Road

Plan Change 69 which is the land adjacent to the Westwood development shows an indicative road layout (essential connection) to SH6 and an indicative road which runs adjacent to the highway. SH6 is a Limited Access Road (LAR) as declared under Section 88 of the Government Roothing Powers Act 1989. The purpose of LAR is to stop numerous accesses being created alongside roads which are subject to considerable development pressure. Unless there are considerable overall benefits to the land transport network then the Transport Agency would not support any additional at grade connections to SH6.

The Transport Agency request that the indicative local road running parallel to State highway 6 be deleted due to the potential adverse effects from light glare.

10 Decision Sought

If Council are of a mind to approve these proposed plan changes then the Transport Agency seeks the following relief:

- Network optimisation take place ahead of any proposed roading improvements where applicable;
- The Council provide further information to justify the need for the recommended roading improvements along the SH6
- The Council delete the indicative road which runs adjacent to SH6;
- The Council remove the indicative roading connection to SH6; and
- Any other means to address matters raised by the Transport Agency in their submission.

12. The NZTA does wish to be heard in support of this submission.

Dated at Wellington this 30th day of August 2013.



Kristin Aitken

Principal Planning Advisor, Planning and Investment, Central

Address for service: Teresa Minogue
Planning Advisor
NZ Transport Agency
PO Box 5084
Lambton Quay
WELLINGTON

Telephone Number: (04) 894 5240
E-mail: teresa.minogue@nzta.govt.nz

From: Tony Orman <boto@slingshot.co.nz>
Sent: Friday, 30 August 2013 12:43 p.m.
To: Plan Change Urban Growth
Subject: Submission

Submission on Plan Changes to the Wairau/Awatere Resource Management Plan – Blenheim Urban Growth Plan

I wish to oppose the use of highly fertile soils and productive land for Blenheim's future urban development being areas 64 to 69 (inclusive) to the north and west of Blenheim's current boundaries.

The proposals are against the fundamental principles of sound town planning.

In addition the use of the flat land requires pumping stations thus adding to the cost of creating housing.

The Wairau Plains are not large in area and Marlborough needs to make full production use of the fertile soils for food production for commercial production and export crops and in the future to give Marlborough some degree of self sufficiency given that civil and international disorder could result in food shortages.

Blenheim has other options for expansion.

The far more preferable alternative is to expand Blenheim to the south west and south where the soils are less fertile and contours give gradients for sewage and storm water infra-structure.

I find it incredible that the Marlborough District Council have paid ratepayers' money to Auckland-based consultants for such flawed advice.

Tony Orman, MNZIS

*Tony Orman
P O Box 939
Blenheim, 7240
New Zealand*

Ph 03-5777875

Submission on Plan Changes 65,66,67,69,70.
Blenheim Growth Areas 2,3,4,6,7.
to the Wairau/Awatere Resource Management Plan



MARLBOROUGH
DISTRICT COUNCIL

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

David Leslie Price

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

29 Rene Street, R02.

Blenheim

Post Code

7272

Email

Telephone

Business

Home

5788120

Fax

Mobile

0212575728

Address for Service

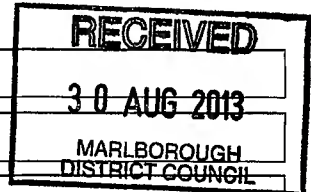
(if different from above)

Post Code

Signature (of submitter or person
authorised to sign on behalf of submitter)

Date

28/8/13



2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

- Loss of rural land and versatile soils.
- Reverse sensitivity effects - rural activities.
- Loss of rural amenity.

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

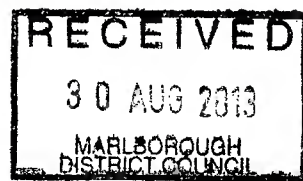
Please see attached 3 pages.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

The rejection of proposed plan changes 65, 66, 67, 69 and 70 for the reasons explained in my submission. Moving forward we need a proposal from Council that offers an acceptable balance of options for those people most negatively affected. My suggestion would be to ask those very people what that might be.

Continue on a separate sheet if necessary



6. My Submission is:

I oppose plan changes 65, 66, 67, 69 and 70 as follows:

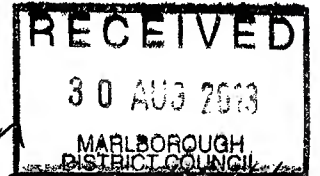
- With regard to loss of rural land and versatile soils:

Paragraph 4 (Plan Changes 64-71 WARMP) 1. Overview states "While these areas proposed for new housing lie on soils of high quality and versatility, in many cases the future use of the soils for food production has already been compromised and as well, the reality has to be faced that the Blenheim urban area has developed on soils of high quality."

This is a generalisation and in fact in many cases the future use of the soils has not been greatly compromised. Much of the area in question is in productive use at the present time as evidenced by aerial photographs. And as certain as it is true that much of the Blenheim urban area has developed on soils of high quality, this is no reason to blindly continue to do so as we should consider the environment more now than we have in times past.

I have previously read in the WARMP about objectives and policies to "maintain or enhance the life supporting capacity of the versatile soils in Rural 3 zone" but see absolutely no pragmatic application of this in these proposed plan changes.

I would like to see Council reconsider the importance of versatile soils as I oppose the lack of protection being given to them and those people who wish for them to remain zoned Rural 3 as they are now.



If Council zones for housing on productive Rural 3 land that is currently farmed, it is being inconsiderate to both the resource itself and its owners if they wish to continue their existing operation. Rezoning would force upon them over time excessive rates relative to their farming income and thereby make their activity unviable.

Should Council ignore this loss of rural land and versatile soils issue and rezone as planned, I would like to see them provide a practical solution to the rating problem it would cause these landowners.

- Reverse sensitivity effects - rural activities:

I oppose the proposed plan changes allowing residential development to become located next to rural activities thus creating new reverse sensitivity issues.

As an example if many houses were allowed next to Bushes Honey operation (Old Renwick Road) this could cause tension between affected parties. My concern is that the existing business would be forced to change in spite of being in operation at this location

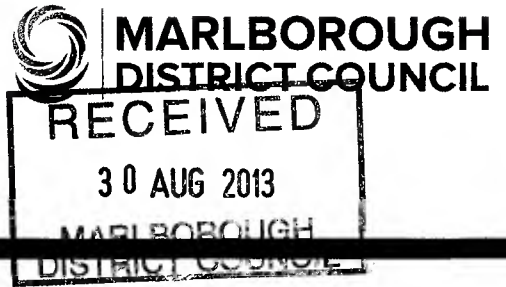
for many years.

I would like to see Council afford some form of protection to existing businesses and rural activities to safeguard their future operation from being dictated to by new development. I note that Colonial Vineyards application for rezoning was rejected due to effects that existing nearby business operations would have on new development.

- Loss of rural amenity:

With regard to rural amenity I oppose the proposed plan changes as they would effect the destruction of this in these areas over time.

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Myra Grace Sandall

Organisation (if applicable)

Contact Person (if applicable)

Myra Sandall

Postal Address

25 Blicks Lane, R.D. 2, Blenheim
7272

Post Code 7272

Email

Myrajeremy@xtra.co.nz

Telephone

Business

Home

03-5778560

Fax

Mobile

027-4486850

Address for Service

(if different from above)

Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)

Date 29/8/13

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

I oppose the plan to turn the most fertile land in Marlborough into residential ~~use~~ therefore subjecting the other side of Blicke Lane, which is my side and zoned rural, to complaints of noise & sprays from our operations, by our "new neighbors"

Continue on a separate sheet if necessary

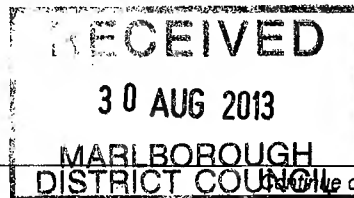
6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

I oppose the the rezoning of one half of Blicke Lane into Residential. I feel your report of suitability of this land for residential zoning is in Error. — Check FAULT LINES.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

I suggest further investigation needs to be done to find more suitable land to Rezone.



Continue on a separate sheet if necessary

SUBMISSION: PLAN CHANGE 67 - URBAN GROWTH AREA

TO: MARLBOROUGH DISTRICT COUNCIL
FROM: KATHERINE JULIE SAVILLE-SMITH
SUBJECT: PLAN CHANGE 67 - URBAN GROWTH AREA
DATE: 30/08/2013

This part of my submission relates to:

The proposed plan change is to amend the Wairau/Awatere Resource Management Plan by rezoning the area from Rural 3 to Urban Residential 2 to facilitate the residential development of the site. An indicative road layout is provided for the zoned land. This area is north of Old Renwick road and adjoins Blicks Lane to the west – 33.2 hectares.

I oppose this part of the plan change in full.

My reasons for opposing this part of the plan change are:

- The negative environmental impacts associated with urban sprawl including:
 - irreparable compromise of ground and surface water
 - reduction of habitat
 - degradation of air and soil
 - degradation of visual amenity and landscape
 - increased risk and costs to manage the impacts of stormwater, river management, water supply and sewerage systems.
- Accumulated affects associated with furthering Blenheim's existing urban sprawl and land use inefficiency particularly because this proposal is simultaneous with similar plan change proposals (Plan changes 64, 65, 66, 68, 69, 70, 71) which together constitute well over 170 hectares of urban land.
- Land degradation associated with rezoned land which is not utilised immediately for use under the new zone.

The data on population growth patterns in Marlborough and Blenheim and the particular nature of its economy do not justify the extraordinary expansion of the urban land proposed in Plan Changes 64-70. It will not reduce residential land prices and will increase travel distances and costs as well as the costs of ratepayer funded infrastructure through the attenuation of sewerage, water supply and local roads. There is no evidence or mechanisms proposed that will promote either environmentally sustainable housing or affordable housing.

The decision I seek from the Council is rejection of proposals Plan Changes 64-70 and, as a consequence, Plan Change 71.

I wish to speak to my submission at any hearing. My contact details are:

- PO Box 26 Spring Creek 035702044 or 0274303575
- kay@cresa.co.nz

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Clyde & Helen Sowman			
Organisation (if applicable)	Walnut Block Wines and Cottages			
Contact Person (if applicable)	Clyde & Helen			
Postal Address	43 Blicks Lane, RD2, Blenheim			
		Post Code	7272	
Email	sowman@walnutblock.co.nz			
Telephone Business		Home	03 5779187	
Fax		Mobile	021 734475	
Address for Service				
(if different from above)				
		Post Code		
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	28.8.2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:



5. The specific parts of the proposed plan change the submission relates to are as follows:

This part of my submission relates to Plan change 67 and in particular the proposed rezoning division down Blicks Lane, where we live.

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

We fully oppose the rezoning of the East side of Blicks Lane from Rural to Residential for a number of reasons.

- One - Family right to farm
- Two - Unsuitable Lane to divide as rural activities are prevalent
- Three - Rezoning prime producing land to residential
- Four - Close proximity of major Fault Line

Please see attached sheet.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

That the zoning for the Blicks Lane area, Plan Change 67, remain as Rural.

Continue on a separate sheet if necessary

6. continued...

Firstly we live at 43 Blicks Lane, west side of the proposed development, so we are directly affected by the rezoning of half our Lane. Our family owns the vineyard which runs between Blicks Lane and Hammerichs Road (21 hectares). It is undeniable that our “right to farm” would be under threat if this rezoning were to go ahead.

It is our intention as a family to farm our land to its maximum potential for many years to come. We know, as does Council, that when residential meets rural there is the increased likelihood of reverse sensitivity issues arising.

Secondly the unsuitability of dividing Blicks Lane is highlighted below: -

1. Throughout the year heavy farm machinery uses Blicks Lane.

In particular there is intense **24 hour** harvest activity of harvesters, truck and trailers, tractors and large group pickers travelling up and down Blicks Lane. This happens every **February through to May** the heavy traffic comes from our vineyard and neighbouring vineyards connected to Blicks Lane.

2. We use Bird Scaring devices such as gas guns, shot guns, motorbike horns and high pitched audio bird repellants. Bird scaring happens from **November to January** for our cherries and **January to May** for our grapes. The neighbouring vineyards also use similar methods.

3. From **August to November** it is necessary for us to take frost prevention methods. This happens in the early hours of the morning for our cherries and grapes. This creates high levels of noise disturbance.

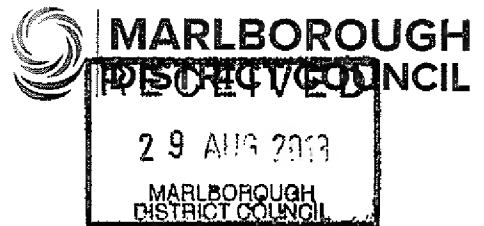
4. In addition we spray our grapes throughout the year. This is always a contentious issue between rural and residential.

Thirdly we purchased our land and paid a premium for the soil quality and the rural location. We chose this area to run our wine and accommodation business and raise our family. It is not fair or right that our long term commitment to this area can be undermined by rezoning.

It seems such a shame and a very short term view that prime producing areas could even be considered for residential use. Also we feel that it is inappropriate that residential rezoning could be consented when the proposed development borders intensive horticultural land use.

Fourthly and finally, the rezoning of this area has been considered after other more suitable areas were deemed no longer viable due to liquefaction. However the Wairau fault line runs only 500 meters north of the proposed rezoning, making this a high risk area for severe earthquake damage.

**Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address

 Post Code

Email

Telephone Business Home
Fax Mobile

Address for Service
(if different from above)
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)
Date

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

Growth Area 4 C Plan Change 67)

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

We support the plan change in the main but would like some clarification around the roading plans, services and timing.
How will indicative roading layouts be finalised and how will landowners be compensated for areas required for roading?

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

Urbanism Plus report November 2012 suggested a buffer zone between urban and rural. We consider this has merit particularly to the west and north of Area 4 and we ^{would} like Council to revisit this proposal. A transitional zone - possibly Rural Residential be considered for these areas.

Continue on a separate sheet if necessary

Submission on Plan Change 64 - 70
Blenheim Growth Area One - Rezoning
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	David Wilson		
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	PO Box 380		
	Blenheim	Post Code	7 2 4 0
Email	wilsondp1@gmail.com		
Telephone Business	022 169 3569	Home	
Fax		Mobile	021 823 314
Address for Service			
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)		Date	29/08/2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496 Email:
urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

See attached submission letter

Continue on a separate sheet if necessary

6. My submission is: *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

See attached submission letter

Continue on a separate sheet if necessary

7. The decision I seek from Council is: *(where amendments are sought, provide details of what changes you would like to see)*

That plan change process in placed on hold until "Accepted Services Plan" is finalised.

Continue on a separate sheet if necessary

Submission on Plan Change 64-71 by David Wilson

I support the Council in re-zoning of land for future Urban Residential Development. It will provide certainty for co-ordinated future development of Blenheim without ad-hoc development through private plan change.

Plan Change 64-70

The concerns I have relate to lack of detail within the plan change documents regarding the mitigation of the effects of urban development on stormwater quality and quantity.

It is well documented that urban development can have detrimental impacts downstream due to increasing the quantity of stormwater runoff in addition to conveying contaminants downstream to sensitive receiving systems.

The plan change document states that:

“Required upgrading of infrastructure (including preparation of a detailed Accepted Services plan by Council), funding mechanisms, and the sequence of development is set out in more detail in the Council Report “Blenheim Urban Growth Provision of Infrastructure Proposed Plan Changes 64-71” attached as Appendix 6 and in Sections 3.4-3.10 of this plan change document.”

Regarding stormwater quantity a common phrase used in Sections 3.4-3.10 of the Plan Change Document is *“The “Accepted Services” plan will provide Retention Pond positions and detail.”* Appendix 6 states that *“Work to date has established initial infrastructure concept plans which can now be subject to more detailed survey and engineering design to finalise an “Accepted Services Plan”.”* From this statement Council acknowledges that it has not finalised the “Accepted Services Plan” yet is relying on it in the plan change document.

The lack of background studies and lack of regard for the possible complexities involved is highlighted by the statement in Appendix 6 that *“Hydraulic modelling has been extensively used to ensure future sewer and water upgrades are identified and levels of service and funding requirements can be met.”*

Without understanding the sensitivity of the receiving systems to changes in stormwater quality and quantity the performance requirements of mitigation measures cannot be established. Therefore the design and thus costing and viability of these measures cannot be estimated.

Appendix 6 refers to the use of retention ponds, but has not stated why these treatment systems have been chosen or whether or not there has been any assessment of whether or not these would work. From my experience I would expect that the following information would need to be assessed prior to estimating pond sizes include;

1. Performance criteria (quality or quantity or both)
2. Downstream water levels
3. Ground water levels

Basically I consider that insufficient work has been undertaken to assess stormwater mitigations measures including sensitivity of receiving systems, performance requirements of mitigation measures, costs (including land area required).

Recommendation

The stormwater aspects of the "Accepted Services Plan" needs to developed in more detail , "finalised", to ensure that stormwater servicing level of proposed Plan Change is assessed with sufficient detail to have confidence that appropriate performance levels can be obtained. The "Accepted Services Plan" should at least meet the level of details expected of Council from a Private Plan Change.

Plan Changes should be placed on hold until "Accepted Services Plan" has been finalised



David Wilson

CPEng MIPENZ (Civil and Environmental)

Nicole Chauval-5486

From: Armstrong Family <armstrongnz@xtra.co.nz>
Sent: Wednesday, 7 August 2013 8:41 a.m.
To: Plan Change Urban Growth
Subject: PROPOSED PLAN CHANGES TO THE WAIRAU/AWATERE RESOUC
MANAGEMENT PLAN

Good Morning

We have no opposition to the Proposed Plan Change 67 Area.

Regards

Hubert Thomas (Tim) & Janet Armstrong
50 Blinks Lane
RD2
BLENHEIM 7272

Submission on Plan Change 67 -
Blenheim Growth Area Four - Rezoning
to the Wairau/Awatere Resource Management Plan



MARLBOROUGH
DISTRICT COUNCIL

Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	Wayne Robert and Christine Anne Barnett			
Organisation (if applicable)				
Contact Person (if applicable)				
Postal Address	P O Box 39			
	Fairlie			
		Post Code	7949	
Email	cabarnett@xtra.co.nz			
Telephone	Business	Home	03 635 6168	
	Fax	Mobile	027 280 0043	
Address for Service	4- Mackenzie District Council			
(if different from above)	Main Road			
		Post Code	7949	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	28-8-2013

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? Yes No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? Yes No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? Yes No

4. Return Submission to:

Attention Planning Technician
Marlborough District Council
PO Box 443
Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

5. The specific parts of the proposed plan change the submission relates to are as follows:

Plan Change 67 - rezoning from Rural 3 to Urban Residential Two.

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

We support this part of the plan change to allow for residential development for the following reasons:

1. There are already a number of smaller lifestyle size blocks in the area making the viability of agricultural production questionable.
2. A roading network is reasonably well established to cater for urban growth in this area with main roads already servicing the region. Blicks Lane has sufficient space to cater for any potential increase in traffic.
3. Reverse sensitivity effects between urban and rural activities will be minimised by the proposal. Blicks Lane provides an appropriate location to create a rural/urban boundary (which must exist at some location). The nature of rural activities in Blicks 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.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

We would seek that Council ensures that there will be no rating impact after rezoning but prior to the land being subdivided.

We would seek 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.

Continue on a separate sheet if necessary