

Wairau/Awatere Resource Management Plan

Plan Change 70 – Urban Growth Area Seven

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

November 2013



Submission Summary - Wairau/Awatere Resource Management Plan - Plan Change 70 - Urban Growth Area Seven - By Name

Gary John Barnett - Submitter #: 1

Submission Point: 01 - Whole Plan Change

Submission: Objects to the Plan Change.

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

Concerned about the loss of fertile land for food production.

Considers the Plan Change needless for such a large area.

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

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

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

Roger William Beardsworth - Submitter #: 2

Submission Point: 01 - Whole Plan Change

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

Relief sought: Reject the Plan Change.

Ian James Brooks - Submitter #: 3

Submission Point: 01 - Whole Plan Change

Submission: Opposes good agricultural land going into housing

The proposal has an adverse effect on the environment.

Relief sought: Exemption (from the proposal) for those (properties) providing important products.

Peter Brooks - Submitter #: 4

Submission Point: 01 - Whole Plan Change

Submission: Submission relates to the rezoning of rural land.

Opposes the plan as rates increases will be unaffordable, and will force people to sell their properties.

Opposed to being forced on to services the submitter does not want e.g. Connection to sewerage mains, recycling services.

Relief sought: If the Plan Changes go ahead rates should not increase until the land is subdivided into urban lots with the services that apply.

Land owners should be able to decide if they want to opt in or not.

Developers shouldn't impact on our environment by forcing extra cost onto people who just want to live here.

Jill Bunting - Submitter #: 5

Submission Point: 01 - Whole Plan Change

Submission: Supports the Plan Change.

The area covered by the Plan Change is close to community facilities and services.

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

With the exception of land occupied by the Brooks Family Trust all land is subdivided into what is essentially residential sized lots and ownership is in individual titles.

There has been no commercial food production on this land for the past 20 years and any sheep stocks in the area are not of sufficient numbers to be considered an economic farming venture.

The area is serviced by the Council wastewater and water supply.

The permeable nature of the underlying Wairau gravels and the presence of streams and Council drains mean the area is able to cope with the existing stormwater.

The rezoning will result in better checks and balances to ensure some of development occurring in the area is prevented.

Test drilling has proven that the Plan Change area is not subject to liquefaction and is all original ground.

Relief sought: That the Plan Change be accepted.

Deluxe Properties Limited (Greg Smith) - Submitter #: 6

Submission Point: 01 - Whole Plan Change

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

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

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

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

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

Consultation with property owners is required to make sure existing privately owned stormwater ditches are best utilised for the likes of road reserves/berms and are carefully

planned, and also so that existing right of ways do not become obsolete.

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

Would like the opportunity to discuss infrastructure issues before any final roading plans are prepared.

John Terence Ford - Submitter #: 7

Submission Point: 01 - Whole Plan Change

Submission: Opposes the Plan Changes

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

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

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

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

Relief sought: The Plan Change is rejected in full.

Peter Gissing - Submitter #: 8

Submission Point: 01 - Whole Plan Change

Submission: Fully supports the proposal to rezone the area around David Street / Battys Road / Severne Street to Residential. It is close to shops and schools and is not rural in nature.

Relief sought: If the Plan Changes go ahead rates should not increase until the land is subdivided into urban lots with the services that apply.

Land owners should be able to decide if they want to opt in or not.

Developers should not impact on our environment by forcing extra cost onto people who just want to live here.

Paul Ham - Submitter #: 9

Submission Point: 01 - Whole Plan Change

Submission: Oppose the Plan Change in its entirety.

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

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

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

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

Tom Harrison - Submitter #: 10

Submission Point: 01 - Whole Plan Change

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

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

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

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

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

Anthony John Hawke - Submitter #: 11

Submission Point: 01 - Whole Plan Change

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

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

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

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

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

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

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

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

Peter Graham & Maryanne Therese James - Submitter #: 12

Submission Point: 01 - Whole Plan Change

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

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

Plan Change 68, page 26:

-The description of adjoining land to this area is not strictly correct, as part of the land on the

southern side of Old Renwick Road is the Racecourse, which has Rural 3 zoning.

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

Appendix 4:

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

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

Appendix 5:

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

Appendix 6:

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

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

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

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

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

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

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

H E F & C M T Jones (Angela Jones) - Submitter #: 13

Submission Point: 01 - Whole Plan Change

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

The submitter supports the proposed Plan Change subject to relief sought.

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

Kapiti Views Trust (Murray Hunt) - Submitter #: 14

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the development of land north of Blenheim as it is an inappropriate use of land.

The land is highly productive and a versatile resource.

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

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

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

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

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

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

The servicing constraints and geotechnical risks will create affordability issues.

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

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

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

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

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

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

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

The Plan Changes fail to achieve the integrated management of the effects of use, development or protection of land and the associated natural and physical resources of the District, as required by section 31 of the Resource Management Act.

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

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

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

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

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

Kenneth Olender Lawrence - Submitter #: 15

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the Plan Change

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

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

Wendy and Clayton Lindstrom - Submitter #: 16

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the rezoning of the Battys Road area.

The submitter is located at 33 Battys Road and their property will not be rezoned as residential as the rezoning stops at 31 Battys Road. This means all but one of the property boundaries will be residential, which the submitter argues does not make sense.

The Council has provided reason for this, stating it is because of liquefaction risks.

The property has experienced two major earthquakes recently and did not suffer from any liquefaction. As a result the submitter contends there is no reason for their property to not be rezoned as residential.

Relief sought: The property is included in the residential zoning.

Murray Ian and Carol Margaret Locke - Submitter #: 17

Submission Point: 01 - Whole Plan Change

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

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

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

Appendix 4:

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

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

Appendix 5:

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

Appendix 6:

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

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

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

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

The "island" of Rural 3 land between Old Renwick Road and the newly zoned Residential 2 land be zoned "large lot residential" with a minimum allotment area of 3,000m², and defer

Residential 2 zoning until more land stability tests have been undertaken.
That additional testing be undertaken in the areas shown to have potential for lateral spread so that a reasoned decision can be made as to an acceptable distance from Casey's Creek where residential development can take place.

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

Marlborough Province of Federated Farmers of NZ (Michael Bennett) - Submitter #: 18

Submission Point: 01 - Whole Plan Change

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

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

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

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

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

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

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

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

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

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

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

Adopt a balanced approach to future development and make provisions for urban growth on land subject to liquefaction risks or reverse sensitivity, hilly land to the south of Blenheim, and productive land.

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

John Ernest Marris - Submitter #: 19

Submission Point: 01 - Whole Plan Change

Submission: Supports the Plan Change in part.

Aware the Council is running out of time and does not have options for land.

If areas are identified as suitable from a geotechnical view then the Plan Change areas identified in Plan Changes 66, 69 and 70 should be considered given their proximity to the existing town and services.

If land of high versatility is to be used for residential development the Council should mitigate this change of land use by considering the rezoning of lower versatility land to the west, south west, and south of Blenheim. The rezoning of this land would give the public choice between lower lying area to the north-west, and the higher land to the west, south-west and south of Blenheim.

Opposes the parts of Plan Changes 66, 69 and 70 that rezone areas where reverse sensitivities will occur from existing businesses. The submitter states these areas need careful planning and zone mitigation in buffering areas and this is not addressed in the Plan Changes.

If the north-west and north Plan Change zones areas are approved then the provision of additional education facilities will need to be considered.

Relief sought: That the Plan Change be accepted in part and that the Council reconsider the effects of reverse sensitivity on those areas within the Plan Change area from existing or planned businesses.

Kevin & Lynda Morgan - Submitter #: 20

Submission Point: 01 - Whole Plan Change

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

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

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

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

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

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

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

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

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

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

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

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

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

Submission Point: 01 - Whole Plan Change

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

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

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

The submitter also questions how Council will coordinate the servicing.

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

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

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

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

NZ Transport Agency (Teresa Minogue) - Submitter #: 22

Submission Point: 01 - Whole Plan Change

Submission: Supports the Plan Changes in part.

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

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

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

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

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

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

The indicative roading connection to SH6 is removed.

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

David Leslie Price - Submitter #: 23

Submission Point: 01 - Whole Plan Change

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

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

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

Rezoning the productive land for residential use will place a rating burden on existing farming properties and their operations will become economically unviable. If Council goes ahead with rezoning, a solution should be presented by Council to the affected property owners for the rating problem.

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

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

Relief sought: The Plan Change is rejected.

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

Susan Claire Ramsay - Submitter #: 24

Submission Point: 01 - Whole Plan Change

Submission: Relates to the proposed rezoning of Rural 3 to Urban Residential 2.

Opposes the proposal and requests that the area is not included in Blenheim's future urban growth.

The area has for a long time served as a buffer zone between rural and urban Blenheim.

The flat fertile agricultural land is too good to be used for housing.

Allowing this area of land to become Urban Residential 2 would cause a domino effect, creating more development pressure in the western direction, removing even more prime rural land.

Many residents in the proposed rezoning area live there because of its rural nature. Bringing housing into a rural area causes many conflicts of interest between those conducting rural activities and urban dwellers, causing reverse sensitivities.

The proposed area is prone to flooding and drainage issues.

The services in this area are not of a standard to handle the increased traffic/development. Who would pay for this?

Upgrading the services would cause an increase in rates. Council should not increase the rates of those who use the land in a rural manner.

Relief sought: Leave the land in the area of the Plan Change as Rural 3 Zone.

Trevor Cyril Roughan - Submitter #: 25

Submission Point: 01 - Whole Plan Change

Submission: Supports Plan Change 70

The Plan Change should include the south side of David Street

The farm land should be residential as it is not big enough to farm.

Relief sought: Include the south side of David Street.

Katherine Julie Saville-Smith - Submitter #: 26

Submission Point: 01 - Whole Plan Change

Submission: Opposed to the Plan Change.

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

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

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

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

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

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

Relief sought: The Plan Change is rejected in full.

David Wilson - Submitter #: 27

Submission Point: 01 - Whole Plan Change

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

Concerned about the lack of detail and insufficiency of work completed regarding how the adverse effects of urban development on stormwater quality and quantity will be mitigated.

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

treatment.

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

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