



**MARLBOROUGH
DISTRICT COUNCIL**

Wairau/Awatere Resource Management Plan

Plan Change 71 – Urban Growth Area Plan Provisions

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**



Submissions close 5.00 pm 30 August 2013

1. Submitter Details

Full Name	ROGER WILLIAM BEARDSWORTH			
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Contact Person (if applicable)				
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	Fax	Mobile	03 572 4454 021 027 5488	
Address for Service				
(if different from above)				
		Post Code		
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	24-8-13

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

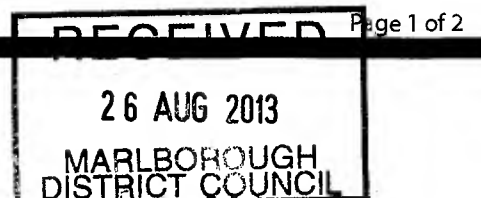
4. Return Submission to:

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:

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 SHOULD BE ALLOWED ON 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)

REJECT 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			
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	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

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Attention Planning Technician
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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 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)

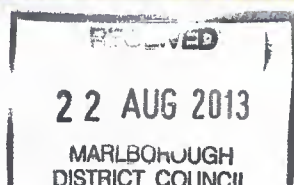
Continue on a separate sheet if necessary

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.

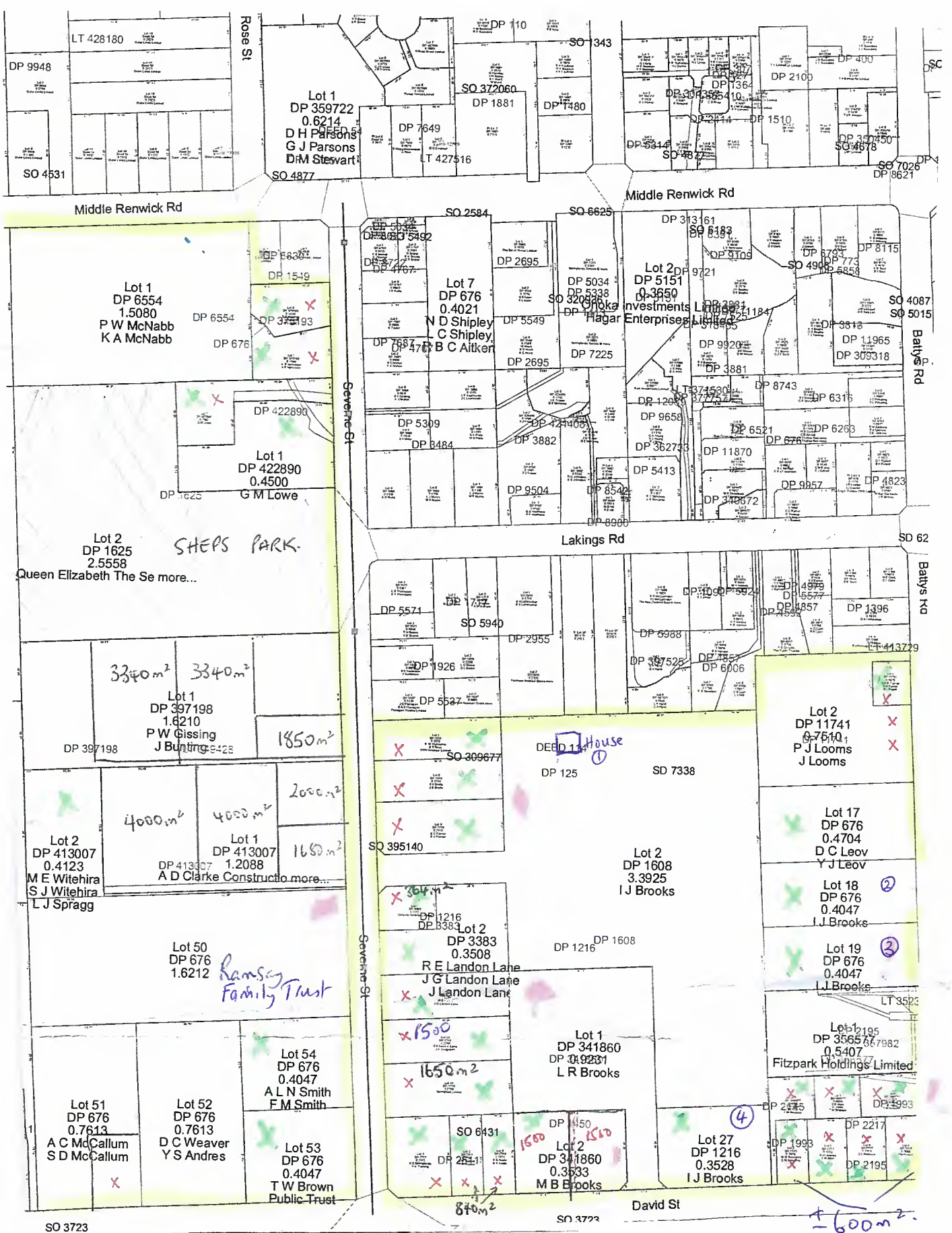
The area is serviced by town sewerage and water and has the ability to cope with stormwater due to the permeable nature of the underlying Wairau gravels- liquefaction drilling showed the gravels under the topsoil were 15m deep on our property (24 Severne St)- and the presence of streams and drains which 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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22 AUG 2013

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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.

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

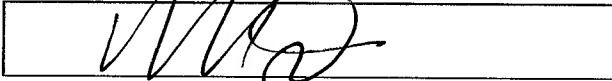
Organisation (if applicable): DeLuxe Properties Limited

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.

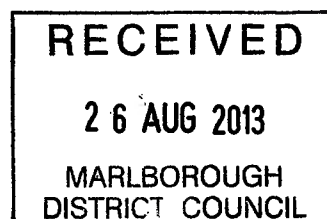
Continue on a separate sheet if necessary

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.



Submission on Plan Changes 69 and 71 to the Wairau/Awatere Resource Management Plan

Clause 6 of First Schedule, Resource Management Act 1991

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

Email: urbangrowth@marlborough.govt.nz

Name of submitter: Foodstuffs (South Island) Properties Limited (**Foodstuffs**)

1. This is a submission on the following plan changes to the Wairau/Awatere Resource Management Plan ("the District Plan"):
 - a. Proposed Plan Change 69 ("Plan Change 69") which relates to rezoning a 32.25 hectare area of land between Old Renwick Road and Middle Renwick Road ("SH 6") from Rural 3 to Urban Residential 2; and
 - b. Proposed Plan Change 71 ("Plan Change 71") which relates to road layouts that will apply to subdivision and development of land generally covered by Plan Change 69.
2. Foodstuffs could not gain an advantage in trade competition through this submission.
3. This submission relates to Plan Changes 69 and Plan Change 71 in their entirety.
4. Foodstuffs do not support Plan Change 69 or Plan Change 71 in their current form as set out in this submission.
5. In summary, Foodstuffs' submission is:
 - a. The Westwood retail area needs to be rezoned from rural to a zoning which reflects existing large format retail commercial activities;
 - b. It is important and logical that this rezoning occur at the same time or prior to the rezoning of the surrounding area from Rural 3 to Urban Residential 2;
 - c. If Westwood retail area is rezoned, proper recognition and provision can be given to potential reverse sensitivity effects that could arise from enabling residential activity to establish in close proximity to commercial activities, such as the existing PAK'nSAVE food warehouse operation; and
 - d. The rezoning will ensure integrated management of the effects of use, development or protection of land and associated natural and physical resources of the District is achieved as required by section 31 of the RMA.

6. In summary, Foodstuffs' submission is that Plan Change 69:
 - a. Fundamentally ignores existing activities on land adjacent to proposed residential development (including, in particular the operation of a PAK'nSAVE food warehouse within the Westwood retail area);
 - b. Does 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;
 - c. Fails 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 RMA;
 - d. Fails to meet the requirements of section 32 of the RMA, in that the proposed policies and rules are not the most appropriate method for achieving the RMA's purpose nor are they the most efficient and effective means for achieving the District Plan's objectives;
 - e. Will not assist the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and
 - f. Does not promote the sustainable management of natural and physical resources, and is therefore not in accordance with Part 2 of the RMA.

7. In summary, Foodstuffs' submission is that Plan Change 71:
 - a. Does not consider potential effects of indicative roading connections on existing commercial activities. To that extent, Plan Change 71 indicates a roading connection over the Westwood retail area that would potentially require the relocation of some of the carparking associated with the PAK'nSAVE food warehouse, and this will not be feasible or practical.
 - b. Does not achieve integrated management of the effects of use, development or protection of land and associated natural and physical resources in inter-zonal situations as required by section 31 of the RMA.
 - c. Fails to meet the requirements of section 32 of the RMA, in that the proposed policies and rules are not the most appropriate method for achieving the RMA's purpose nor are they the most efficient and effective means for achieving the District Plan's objectives;
 - d. Will not assist the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and
 - e. Does not promote the sustainable management of natural and physical resources, and is therefore not in accordance with Part 2 of the RMA.

Background

8. Foodstuffs are a retailer owned co-operative company and the wholesale supplier to PAK'nSAVE food warehouses, New World and Four Square supermarkets, On the Spot dairies and many unaffiliated outlets. Foodstuffs (South Island) Properties Limited is a property holding company and wholly owned subsidiary of parent company Foodstuffs.
9. Foodstuffs own the PAK'nSAVE food warehouse at 1 Westwood Avenue, Springlands, Blenheim (legally described as Lot 1 DP 4434612). The PAK'nSAVE is located within the Westwood retail area, and is directly adjacent to the Plan Change 69 area (along its western boundary).
10. Loading and servicing is provided at the rear of the PAK'nSAVE. The loading zone runs along the length of its western boundary, and it is separated from the area proposed for residential housing in Plan Change 69 by a two metre high timber fence, and some landscaping. The PAK'nSAVE store hours are 7:00 a.m. – 10:00 p.m., seven days a week. Activities also occur outside of these hours such as the delivery of goods which occurs at the rear of the site, and packing shelves.

Concerns with Plan Change 69

11. In Foodstuffs' experience, where new residents come into an area where a commercial activity is established and operating this can lead to complaints about effects on amenity (which they often had not anticipated), therefore making it difficult for the lawfully established commercial activity to continue operating and/or creating additional costs. Complaints are commonly made in relation to noise, traffic, light and operating hours. Stormwater disposal is also a common issue, with discharges from adjoining rezoned properties that once developed impact on the established commercial activity and its existing stormwater management systems.
12. The Plan Change 69 explanatory documents acknowledge that residential activities could locate in proximity to retail activities on the adjoining Westwood site, and that this could result in reverse sensitivity effects (relating to such matters as noise and traffic) (Table 6, p.31). However, no specific mitigation measures are then proposed for the plan change. The existing residential provisions which are proposed to be adopted do not recognise land use conflict with commercial activities. The Urban Residential 2 zone anticipates low-to-medium density housing in an area currently zoned rural. Residential activity is a permitted activity, subject to some limited conditions. There are no building set-backs. A home could be built right up to the boundary shared with PAK'nSAVE (and its loading and servicing facilities), provided it achieves the sunlight access control. There are limited controls on stormwater management. Stormwater disposal is a permitted activity in the Urban Residential 2 zone, subject to limited conditions. These permitted activities in a new residential area are likely to adversely affect Foodstuffs' established operations on its site.
13. Retail activities such as supermarket and food warehouse operations are a desirable component of urban areas, and will typically act as an "anchor". Plan Change 69 needs to explicitly recognise this, and the likely adverse effects that residences will experience if they locate next to these activities (for example, noise, traffic and light). This would be consistent with established District Plan provisions such as Objective 7.1.2 (Quality of Life), and Policy 7.1.7 (Amenity Values).

14. Resource consents should be obtained as a restricted discretionary activity for those residential activities directly adjacent to the Westwood retail area. Assessment criteria should include the likely effects of the proposal on existing activities on adjacent sites. Alternatively an appropriate setback could be included in Plan Change 69 which mitigates the likely effects on residences from the PAK'nSAVE operations.
15. The underlying zone of the Westwood retail area (where the PAK'nSAVE is located) is Rural. It is appropriate that this site be rezoned to reflect current commercial activities carried on, and that this should occur at the same time as or prior to rezoning the surrounding area. The rezoning of the Westwood retail area (and in particular the PAK'nSAVE) will assist to protect against potential reverse sensitivity effects.


Concerns with Plan Change 71

16. To achieve integrated management of the effects of use, development or protection of land and associated natural and physical resources in inter-zonal situations, the interface with the Westwood retail area and its current commercial operations needs to be properly considered.
17. New Policy 1.18 requires that subdivision and development be in general accordance with roading layouts shown on the proposed planning maps.
18. Plan Change 71 does not consider land use interface or the potential adverse effects of indicative roading connections on existing commercial activities. For example, the proposed roading for the Plan Change 69 area shows one new connection onto Old Renwick Road and two connections onto Rene Street. A possible connection onto SH6 is shown at the south west corner and a proposed link road onto Westwood Avenue roundabout. Such a connection potentially requires the relocation of some of the carparking associated with the PAK'nSAVE supermarket. This connection will not be feasible or practical.
19. The planning maps and/or new Policy 1.18 should be amended to provide for flexible roading connections.

Decision sought

20. Foodstuffs seek the following decision:
 - a. That the Westwood retail area (including, in particular the PAK'nSAVE food warehouse) be rezoned to reflect the existing activities on the site; and
 - b. That the policies and rules in Plan Change 69 and Plan Change 71 be amended to reflect the issues raised in this submission; and/or
 - c. 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.

21. In the alternative, Foodstuffs seek the following decision:
- a. That Plan Change 69 be placed on hold pending the wider District Plan review that addresses the inter-zoned circumstances; and/or
 - b. That the policies and rules be amended to reflect the issues raised in this submission; and/or
 - c. 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.
22. If the relief in paragraphs 20 or 21 is not granted, then Foodstuffs seek the following decision:
- a. That Plan Change 69 and Plan Change 71 are rejected.
23. Foodstuffs wishes to be heard in relation to this submission, and are willing to present a joint case.



J Crawford / A Roberts
Foodstuffs (South Island) Properties Limited

Address for service of submitter:

Anderson Lloyd
18a Birmingham Drive,
Middleton,
PO Box 13831,
CHRISTCHURCH 8141

Tel: 03 379 0037
Fax: 03 379 0039

Contact Person: Jen Crawford / Alex Roberts
Email: jen.crawford@andersonlloyd.co.nz / alex.roberts@andersonlloyd.co.nz

**Submission on Plan Change 70 -
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**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

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Submission No:



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

PLAN CHANGE 70/71.

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)

MOST OF THE LAND IN THE DAVID ST / BATTYS RD SEVERNE ST AREA IS IN RESIDENTIAL TYPE DENSITY HOUSING ALREADY. NONE HAS BEEN USED FOR PRIMARY FOOD PRODUCTION IN THE 13 YEARS I HAVE LIVED HERE AS ALL THE BLOCKS ARE TOO SMALL. THE FEW SHEEP AROUND ARE TO KEEP THE GRASS DOWN. I FULLY SUPPORT THE PROPOSAL TO REZONE THIS AREA TO RESIDENTIAL. IT IS CLOSE TO STOPS AND SCHOOLS AND IS NOT RURAL IN NATURE

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 REZONE PLAN CHANGE 70 FROM RURAL 3 TO RESIDENTIAL 2.

Continue on a separate sheet if necessary

**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

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

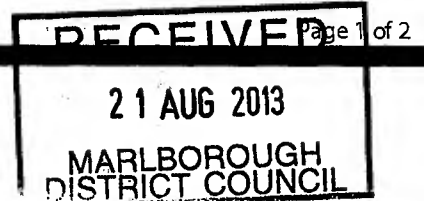
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For Office Use
Submission No:



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

Uncertain as I don't have a map of plan change 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)

as above
If it refers to land at the New Renwick Rd end of Batty's Road I would support the change. (subject to confirmation)

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 be confirmed

Continue on a separate sheet if necessary

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)			
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	RD 2		
	Blenheim	Post Code	7027
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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 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
BLENHHEIM

Post Code 7272

Email

Telephone Business Home

Fax Mobile

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

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 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 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

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

Therefore, they contribute \$11,425 per lot

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 = 17 lots - 15% = Total 100% infrastructure cost covered 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

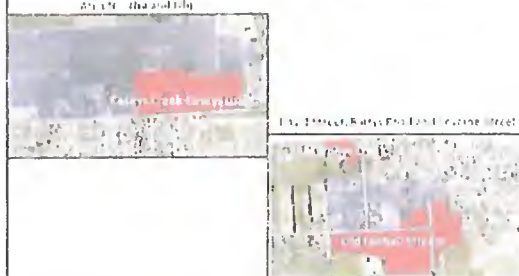
Background

- 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 64-70 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 - Roads, pipes, infrastructure, etc. (variable)
- Professional fees - Lawyers, Real Estate, etc.
- Council fees - Council rates, etc.

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 joint case with others who have made a similar submission? Yes No

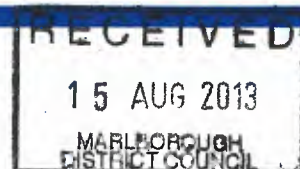
4. Return Submission to:

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,

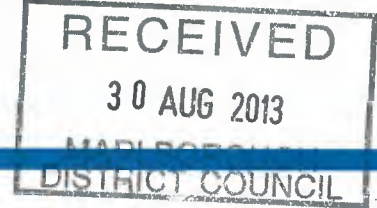
Continue on a separate sheet if necessary



**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:

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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.



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

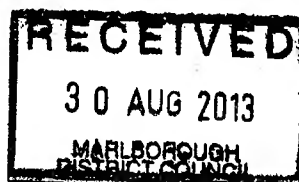
4. Return Submission to:

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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.

Submission on Plan Changes 70 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		
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	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

Solutes and duty understood & agreed

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:

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Marlborough District Council
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Blenheim 7240

Fax: 520 7496

Email: urbangrowth@marlborough.govt.nz

For Office Use
Submission No:

Kevin & Lynda Morgan
Submission on Plan Change 70 and 71 continued

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

This submission specifically relates to Plan Change 70 which identifies land in the vicinity of David Street, Severne Street and Battys Road for rezoning and Plan Change 71 as it applies to that area [as shown in Appendix 10 to the Plan Change].

The submission relates to the whole of the Plan Change.

6. My submission is:

- i. Plan Change 70 will rezone existing areas land that have been extensively developed for residential use but does not include all of the existing rural activity. The rezoning will place residential use beside or close to existing and long established productive rural land uses and practices.
- ii. The Plan Change notes the potential for reverse sensitivity to adjoining rural land areas but does not address it in substantive way or acknowledge the need for transitional areas.
- iii. Plan Change 70 fails to acknowledge that the areas on the south side of David Street are residential in character and that they should be included within the Plan Change with any potential liquefaction other concerns addressed by means of the provisions of Plan Change 71 (if adopted).
- iv. The Plan Change if approved will result in the expansion of residential land adjacent to some 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 by way of larger lots that are effective in preventing or mitigating reverse sensitivity issues.
- v. 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 without an adequate buffer.
- vi. The Plan Change is fundamentally flawed in not providing for a urban – rural interface and does not capture existing activity that is residential in character in the area.

7. The decision I seek from Council is:

- i. The Plan Change should make provision within the zones for reverse sensitivity.
- ii. The Plan Change area should include adjacent land including the land to the south of David Street and including the block situated at 102 Battys Road (being Part Lot 64 DP 901) to enable a transition from dense urban development to lower density development to rural land and mitigate reverse sensitivity.
- iii. 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.


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**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	
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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
BLLENHEIM 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

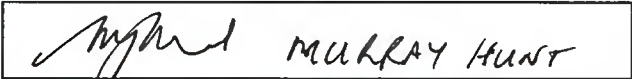
Telephone Number: (04) 894 5240
E-mail: teresa.minogue@nzta.govt.nz

**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				
Organisation (if applicable)	Outer Limits Limited			
Contact Person (if applicable)	Murray Hunt			
Postal Address	PO Box 646			
	Blenheim 7201	Post Code	<input type="text"/>	
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Telephone	Business	578 5339	Home	<input type="text"/>
	Fax	<input type="text"/>	Mobile	<input type="text"/>
Address for Service	<input type="text"/>			
(if different from above)	<input type="text"/>			
	<input type="text"/>	Post Code	<input type="text"/>	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	30.8.2013

Schedule and duty 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:

Outer Limits Limited
Submission on Plan Change 71 continued

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

The whole of the Plan Change.

6. My submission is:

That the methodology adopted of having site suitability ascertained and infrastructure provided for after the rezoning of the relevant land is inappropriate and inefficient.

That zoning should be deferred or not proceed until it is clear that sites can be safely, efficiently and economically developed and that all infrastructure can be completed.

7. The decision I seek from Council is:

That the Plan Change 71 should be modified in such a way that the required infrastructure is a prerequisite to development on the site and a prerequisite to the rezoning or that deferred residential zonings are utilised until the infrastructure is provided for.

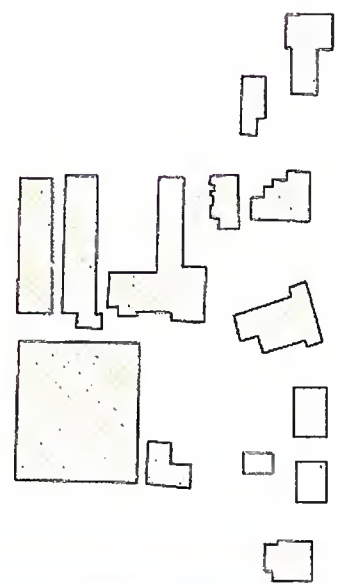
This submission can also be read in combination with the submission on Plan Change 66 and 69 by the submitter and the appropriate zoning for all of the sites identified in those submissions.

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Options to implement track or coverage for additional sites

Options to enhance track or coverage for additional sites



SUBMISSION: PLAN CHANGE 71 - URBAN GROWTH AREAS - PLAN PROVISIONS

TO: MARLBOROUGH DISTRICT COUNCIL
FROM: KATHERINE JULIE SAVILLE-SMITH
SUBJECT: PLAN CHANGE 71 - URBAN GROWTH AREA
DATE: 30/08/2013

This part of my submission relates to new provisions relating to subsoil investigations and road layouts that will apply to subdivision and development of land generally covered by Plan Changes 64 to 70.

I oppose this part of the plan change in full.

My reasons for opposing this part of the plan change are that they support and encourage Plan Changes which:

- 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, 67, 68, 69, 70) 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 provisions in Plan Change 71 do not mitigate those negative environmental impacts.

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