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To: [Mailroom Mailbox](#)
Cc: steve@wakefieldservices.co.nz; [Justin Busbridge \(justin.busbridge@xtra.co.nz\)](mailto:justin.busbridge@xtra.co.nz); [Mark Allan](#)
Subject: [#500189] Submission on PC1 to Chapter Regional Policy Statement - 199 Johns Road Limited, Rangiora
Date: Monday, 15 February 2021 2:30:22 pm
Attachments: [image710877.png](#)
[image242001.png](#)
[image745750.png](#)
[199 Johns Rd Ltd Submission PC1 Chapter 6 RPS 20210215.pdf](#)

Good afternoon

Please find attached the submission on Proposed Change 1 to Chapter 6 of the Regional Policy Statement from 199 Johns Road Ltd in relation to the property at 199 Johns Road, Rangiora.

Please let me know if you have any questions.

Ngā mihi nui,

Claire McKeever

**RESOURCE MANAGEMENT PLANNER | ASSOCIATE
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RMA FORM 5

Submission on publicly notified Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Note to person making submission:

The submission period for Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement closes at **5pm Monday 15 February 2021**.

To return this form you can:

- email it to **mailroom@ecan.govt.nz** (subject line: Chapter 6 CRPS submission)
- post it to **Customer Services, Environment Canterbury, PO Box 345, Christchurch 8140**

Your submission (or part of your submission) may be struck out if at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

To: Environment Canterbury

1. Submitter details

Please note: all fields marked with an asterisk () are required.*

Name of submitter(s)* _____

Submitter address* _____

City/Town* _____ Postcode* _____

Contact name (if different from above) _____

Contact organisation _____

Contact email address _____

Contact address (if different from above) _____

City/Town _____ Postcode _____

Contact phone number _____

Please note that by making a submission your personal details, including your name and contact details, will be made publicly available in accordance with the Resource Management Act 1991. While all information in your submission will be included in papers which are available to the media and the public, your submission will be used only for the purpose of this process.

2. Trade competition declaration* (Please tick the statement that applies)

I could gain an advantage in trade competition through this submission.

☐ Yes ☐ No

If yes: I am directly affected by an effect of the subject matter of the submission that

(a) adversely effects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

☐ Yes ☐ No

Note: *If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

3. Submission details*

☐ I am enclosing further supporting information in addition to this submission form.

Provision to which my/our submission relates: <i>(Please specify the provision or other aspect of the proposed change your submission relates to)</i>	My/our position on this provision is: <i>(Select one option)</i>	My/our reasons for supporting/opposing the amended provisions are:	The decision I/we want is: <i>(Please specify if you want the provision to be retained, amended or deleted)</i>
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		

2. Submission details*

	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		
	<input type="checkbox"/> Oppose in part <input type="checkbox"/> Oppose in full <input type="checkbox"/> Support in part <input type="checkbox"/> Support in full		

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

Note: A signature is not required if you make your submission by electronic means.

15 February 2021

mailroom@ecan.govt.nz

Customer Services
Environment Canterbury
PO Box 345
Christchurch 8140

Our reference: 500189

Attention: Environment Canterbury

Submission to Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

Submitter Details

199 Johns Road Limited (Landowner)

Directors:

Steve Wakefield: steve@wakefieldservices.co.nz

Justin Busbridge: justin.busbridge@extra.co.nz

Mark Allan: mark.allan@eliotsinclair.co.nz

Address:

199 Johns Road Rangiora 7400

Address for Service:

Eliot Sinclair

C/- Claire McKeever

camk@eliotsinclair.co.nz

The submitter confirms they could not gain an advantage in trade competition through this submission.

Provisions to which the Submission Relates:

- Amendment to Map A (Support in Part)
- Amendment to the explanation and reasons Policy 6.3.1 Development within the Greater Christchurch area (Support)
- Amendment to Policy 6.3.3 Development in accordance with outline development plans (Support)

- Amendment to Policy 6.3.7 Residential location, yield and intensification (Support)

Reasons for the Submission

199 Johns Road Limited owns land (currently zoned rural) in the South West Rangiora unzoned residential Greenfield Priority Area (GPA) as shown on Map A of the Regional Policy Statement at 199 Johns Road Rangiora.

The Proposed Change 1 (PC1) to Chapter 6 of the Canterbury Regional Policy Statement identifies Future Development Areas (FDA) for additional land to be used for residential development in Rangiora to meet a shortfall of housing capacity. The location of one of the FDA's identified in Rangiora is immediately west of the Greenfield Priority Area that is partly owned by the submitter. The proposed FDA is an extension of urban development to enable full residential development up to the Projected Infrastructure Boundary (Rangiora urban limit) also identified on Map A.

The inclusion of the new FDA in Map A was identified by the Greater Christchurch Settlement Pattern Update in 2018/2019. It is proposed, in conjunction with other RPS policy, methods and reasoning amendments, to enable Waimakariri District Council to re-zone the additional FDA land as part of the Waimakariri District Plan review within an Outline Development Plan. The submitter understands the notification of the Proposed Waimakariri District Plan is imminent.

199 Johns Road Limited submitted in support of the original Settlement Pattern Update in 2019 to include the additional FDA area and have since been liaising with Waimakariri District Council on the draft Rangiora West Structure Plan concepts for the FDA and Greenfield Priority Area (GPA). Waimakariri District Council intends to include both in an integrated and comprehensive approach to Western Rangiora in accordance with RPS Policy 6.3.3. On this basis, the submitter is supportive of the amendment to Map A to include the new FDA, is supportive of the amendment to the "principal reasons and explanation" for *Policy 6.3.1 Development within the Greater Christchurch area* and is supportive of the amendments to *Policy 6.3.3 Development in accordance with outline development plans*.

In respect of the amendments to *Policy 6.3.7 Residential location, yield and intensification*, 199 Johns Road Ltd notes that Proposed Change 1 does not propose to increase the minimum net density from 10 houses to 12 houses per hectare that was recommended as part of the Urban Settlement Pattern update documentation. The submitter previously supported the change from 10 to 12 houses per hectare for the Waimakariri District and considers the increased minimum density continues to be appropriate. Given the density is proposed is a minimum, 199 Johns Road Ltd supports Policy 6.3.7 on the basis that Waimakariri District Council may require 12 houses per hectare be achieved at the time of their District Plan review.

One matter of clarification that the submitter requests as part of PC1 submission relates to a proposed change to Map A that has not been addressed in any documentation provided to date, as such in relation to Map A, the submission is to "Support in part". Map A is produced at such a scale that edge details are difficult to confirm. Canterbury Maps (the ECan public GIS system) which is linked to the PC1 ECan website¹ shows Western Rangiora Map A close up with the proposed the FDA (in orange) and GPA (in green) as follows in Figure 1:

¹<https://haveyoursay.ecan.govt.nz/chapter6CRPS>

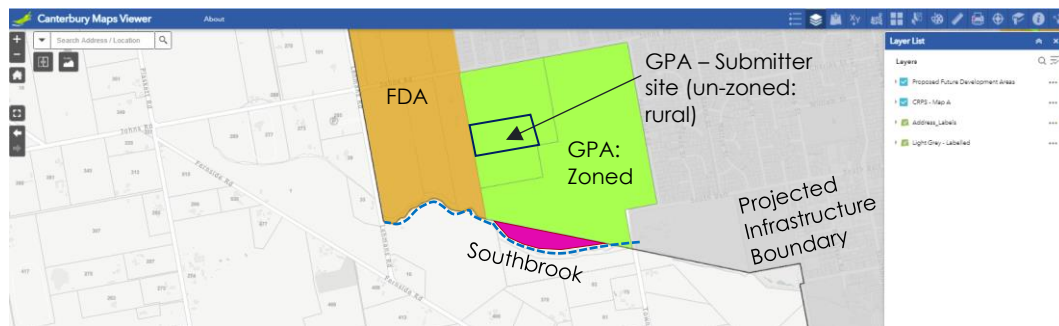


Figure 1: Canterbury Maps; South West Rangiora proposed changes to Map A

Previously, the Projected Infrastructure Boundary (PIB) for Rangiora has coincided with the Southbrook Stream. In Figure 1 it is clear that the change to Map A for the zoned greenfield Priority Area is no longer proposed to coincide with the Southbrook boundary in the area shown in Figure 1 as pink. At the time of the Land Use Recovery Plan (LURP) and re-zoning of the South West Rangiora area in 2013/2014 this land (and land to the North) was considered to be a High Hazard area subject to flooding in an extreme event from the Ashley River Breakout. Due to this, the land, while inside the PIB and GPA, had to remain rurally zoned. It is noted that the proposed GPA boundary in Figure 1 does not coincide with either the current Residential/Rural zone boundary in the GPA or the Southbrook.

Since the LURP, ECan and Waimakariri District Council have revised flood models pertaining to the Ashley River. Waimakariri District Council has identified land north of the Southbrook is now at a medium risk of flooding and possibly likely to be constrained for further development. Despite this, the FDA to the west of the GPA appears to closely follow the Southbrook boundary while having the same potential for flooding constraints that will apply. Given this, it is difficult to distinguish whether the change to the GPA on Map A is intentional as a result of flood modelling or whether it is simply an error. It is submitted that any change to the GPA on Map A as part of PC1 must be correct. Alternatively, if the only change to Map A is to add the new FDA, that its corresponding boundary adjacent to the Southbrook also take account of hazard constraints when being considered to be extended to the PIB (or not as the case may be).

Decision Sought

The submitter requests that ECan and the Minister:

1. Confirm the correct Projected Infrastructure Boundary, Future Development Area and Greenfield Priority Area boundaries in the vicinity of the Southbrook for South West Rangiora as part of the change to Map A.
2. Confirm the subsequent Map A update
3. Confirm with no changes the proposed amendments to Chapter 6 in relation to:
 - Explanation and reasons Policy 6.3.1 Development within the Greater Christchurch area
 - Amendment to Policy 6.3.3 Development in accordance with outline development plans
 - Amendment to Policy 6.3.7 Residential location, yield and intensification

We understand the proposed change will be considered through a streamlined process and that there will not be the usual opportunity to speak to the submission. We therefore submit that if ECan have any questions that require clarification of this submission when preparing the written recommendations report, or at Independent Commissioner review stage, that the submitter be contacted directly.

Yours faithfully

A handwritten signature in black ink, appearing to read 'CMcKee', with a stylized flourish at the end.

Claire McKeever

Resource Management Planner | Associate

BSurv(Hons) MS+SNZ MNZPI

claire.mckeever@eliotsinclair.co.nz