

Hearing Speech – Submission 101.1 438 Mairaki Road – MJ & RM Borcoskie

Thank you for the opportunity to speak to this submission. MJ and RM Borcoskie have asked me to represent them and their land as this matter causes them stress and angst and they are at an age where they prioritise their health both mental and physical.

MJ and RM Borcoskie have owned and lived at 438 Mairaki Road for 45 years and they and I have seen the district and area change from a farming community, to predominantly lifestyle block ownership of 4ha with new houses built. The area has changed from a land based primary production settlement with “primary production being the predominant land use”¹ to a Rural Lifestyle community with “a highly modified landscape strongly influenced by fine grained patterns and processes of human induced activity.”² They have chosen to support the New Zealand economy and land based primary production and not subdivide their land as their surrounding properties have done in the past 20 years. 438 Mairaki Road is now bordered by approximately 13 4ha lifestyle blocks. The areas land is predominantly fragmented, and it would be untruthful to say that these 4ha lifestyle blocks are “supporting activities reliant on the natural and physical resources of the Rural Lifestyle Zone”³. Most 4 ha block owners work in other occupations unrelated to farming and their properties do not support primary production activities.

Reverse sensitivity issues occur regularly, be it stormwater drainage from the neighbouring western subdivision, or plastic rubbish blown from lifestyle blocks where stock have eaten and consequently cause digestive issues and die. (as witnessed by Maurice Borcoskie)

Many others, at least 8, have attested in their submissions that this general area is more akin to the proposed RLZ characteristics than the proposed Policies GRUZ-P1 Character of the General Rural Zone.

MJ & RM Borcoskie therefore seek that this area be zoned in accordance with its current predominant characteristics.

I take it you have read the evidence, or supporting document, I have supplied. I wish to highlight the key takeaways from this.

- 1) 438 Mairaki Road is more akin to RLZ land because of the predominance of surrounding smaller parcels of land which more closely represent the type of land described as RLZ in the proposed plan. (See map)
- 2) Fragmentation of this area has already occurred in the past 20 years with the subdivision of 4ha blocks reducing land based primary production. Many 4ha blocks of land are unproductive and do not support the rural economy. Therefore, I believe that this region is not highly productive or of a large and geographically cohesive area as described in the NPS-HPL.

¹ APPENDIX-A-RECOMMENDED-AMENDMENTS-RURAL-ZONE-SECTION-42A-REPORT.pdf GRUZ-P1 Character of the General Rural Zone, Point 1

² APPENDIX-A-RECOMMENDED-AMENDMENTS-RURAL-ZONE-SECTION-42A-REPORT.pdf Policies RLZ-P1 Character of the Rural Lifestyle Zone Page 22

³ APPENDIX-A-RECOMMENDED-AMENDMENTS-RURAL-ZONE-SECTION-42A-REPORT.pdf Policies RLZ-P1 Character of the Rural Lifestyle Zone Page 22

- 3) The contour of the rolling land and soil types of 438 Mairaki Road limit many primary production activities and do not make this high performing primary production land, it would be better reflected as RLZ land.
- 4) Reverse sensitivity issues are already being experienced by this property and are unlikely to alter due to the proximity of neighbouring lifestyle properties. The WDC has also demonstrated to MJ and RM Borcoskie that they are more supportive of lifestyle block holders than land based primary producers and have pressured them to take unconsented storm water drainage on to their property, which they have resisted as they do not wish their land to be damaged or become a soak pit for storm water.

The following points were also made in Submission 101.1 however to my knowledge they haven't been addressed directly in reports.

Submission 101.1 detailed, if this property is to be zoned GRUZ:

- 1) It is a contradiction to redefine the GRUZ and then require resource consents for intensive indoor and outdoor farming activities. The proposed rules are not consistent for a rural zone because many sites within the GRUZ are in substance RLZ land. There is no benefit whatsoever to the GRUZ in the proposal when the activity rules are essentially the same as RLZ. This being said, the zoning should be made on a case by case basis.
- 2) The location maps highlight that the property is surrounded by small parcels of land that are more in the nature of RLZ land. Potentially the Council will impose rates within the GRUZ which includes smaller residential blocks to the detriment of the farmers whom operate in GRUZ.
- 3) If the land is to be zoned GRUZ then the rules relating to that zone need to be amended to allow for any future subdivision to be either a controlled activity or a discretionary activity, to allow more flexibility in the future, and provide a better balance as to what may be in the best interests of a particular property where its inclusion with GRUZ is more marginal than the other areas containing the best quality GRUZ land.
- 4) If the GRUZ zoning is to remain, the rules that apply need to be clear and concise and give greater ability for that land to be used as a rural lot, including more intensive rural related uses on the property. If GRUZ land is incapable of future subdivision, then that zoning should have the widest possible meaning in terms of future use and development of that land, and that reverse sensitivity issues are adequately covered.
- 5) The imbalance and arbitrary nature of defining the RLZ and GRUZ areas is likely to lead to subsequent benefits to those within the RLZ to the detriment of the GRUZ.

Further to this:

- 1) The NPS-HPL Policy 4 states, "The use of highly productive land for land-based primary production is prioritised and supported." With this in mind the needs of primary producers

in the GRUZ should be prioritised over smaller land holders who are more akin with the RLZ and the GRUZ regulation should be less than LRZ.

- 2) The NPS-HPL Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land. Currently with, in effect 4ha RLZ blocks surrounding larger blocks of land reverse sensitivity issues are already occurring.

Strategies for dealing with reverse sensitivity effects include:

- a) Protecting the existing activity through rules in the district plan.
 - b) Requiring the new activity enter into a “no complaints” covenant via a land encumbrance.
- 3) There needs to be benefits in GRUZ zone in the proposal for land based primary production to occur, greater than those in the RLZ, and residents of the GRUZ need to be aware and be prepared for the fact that land based primary production is the priority for this area. Complaints from small block holders need to be treated with this priority in mind by the WDC, and land based primary production should not be restricted.

In summary, firstly, I believe that if a blanket allocation of rural zones is to be established as outlined in the PDP 438 Mairaki Road and surrounding properties need to be zoned RLZ as this area is predominantly smaller lifestyle blocks, and fragmentation of the land has already occurred for land based primary production. I believe that the PDP fails to accurately reflect the current characteristics of this area, and the PDP is applying the NPS-HPL to an area that has over the past twenty years altered from a predominantly land based primary production to a Rural Lifestyle area.

Secondly, if this area is to be zoned GRUZ more consideration needs to be given to prioritizing land based primary production over the needs of what are in effect Rural Lifestyle blocks within this zone, with further benefits given to land based primary production activities and minimal regulation.

Thirdly, I request that each parcel of land be considered on its individual characteristics as to whether it can be subdivided into 4ha blocks in the future, not collectively with overarching principles as outlined in the body of the Stream 12B Rural Rezone Requests S42A Report.

