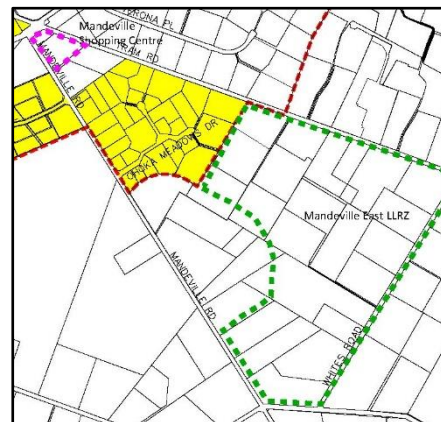


**SUMMARY SUBMISSION OF MARTIN PINKHAM
ON BEHALF OF MARTIN PINKHAM AND OTHERS
REGARDING HEARING STREAM 12C RRLZ**

1 My name is Martin John Pinkham. I have spent my career as a civil and environmental engineer. My full qualifications and experience are set out in Appendix J of my full submission.

2 This summary is in support of the submission of myself and others on the Proposed Waimakariri District Plan (**PDP**) to rezone approximately 86ha at Mandeville East from Rural Lifestyle Zone (**RLZ**) to Large Lot Residential Zone (**LLRZ**). The diagram to the right is amended from the original submission recognising that there needs to be a 300-metre buffer zone between the existing intensive farming operation at 342 Mandeville Road and any potential LLRZ development. The requested Mandeville East LLRZ rezoning encompasses 21 properties ranging in size from 1.77ha to 9.52ha.



3 The western edge of the requested LLRZ zoning is located adjacent to an existing LLRZ zone (Ohoka Meadows) and is within 500m of the existing Mandeville Shopping Centre. Ohoka Meadows Drive is opposite the entrance to the Mandeville Recreation Area, the main sports and recreation facility for the local area. The requested rezoning is 8.4km from the SH1 / Tram Road interchange.

4 Most of the properties in Mandeville East have been the result of subdivision under the WDC Operative District Plan which required a minimum lot size of 4ha in the Rural zone. Apart from three smaller properties on the western edge of Mandeville East that are connected to the Mandeville potable water and wastewater schemes, all the properties have their own potable water well, and their own septic tank wastewater system.

5 The land is poorly utilized for primary production with agricultural activities primarily employed to reduce fire risk. This is not untypical of this type of landholding in the Mandeville area. As other submitters have noted there is a significant demand for LLRZ type properties in the Waimakariri District, and that potential new residents are generally not interested in purchasing 4ha lots. Many of these new residents purchase LLRZ type lots as a work from home base or obtain work in the Waimakariri District.

6 In 2010 the WDC developed a Rural Residential Development Plan (RRDP). This Plan identified Mandeville as a preferred Rural Residential development area, and in particular, south of Tram Road. In 2019 the WDC undertook the development of a new non statutory Rural Residential Development Strategy (RRDS). I participated in this process and in my opinion this process was highly flawed. The preliminary assessment was dismissive of Mandeville as an option and used the Mandeville Growth Boundary as a reason for dismissing Mandeville as an option. This was not logical, especially when it was considered that there were no other Preliminary Criteria triggered. The risk of reserve sensitivity effects on primary production is very low.

7 It is acknowledged that the requested rezoning was not included in the 2019 RRDS. However, the Officers Report has highlighted that the non-statutory 2019 RRDS prepared by WDC has numerous and significant flaws. There are many areas identified for LLRZ zoning in the RRDS that have now been dismissed. There are likely to be many areas where LLRZ zoning has been requested that will meet the criteria detailed in UFD-P3 Identification/location and Extension of Large Lot Residential Zone areas. It is my opinion that the RRDS should be given little weight when considering requests for LLRZ rezoning.

8 I concur with the Officers Response that concluded that LLRZ should not be considered to be urban, and

therefore Policy 1 of the NPSUD is no longer relevant.

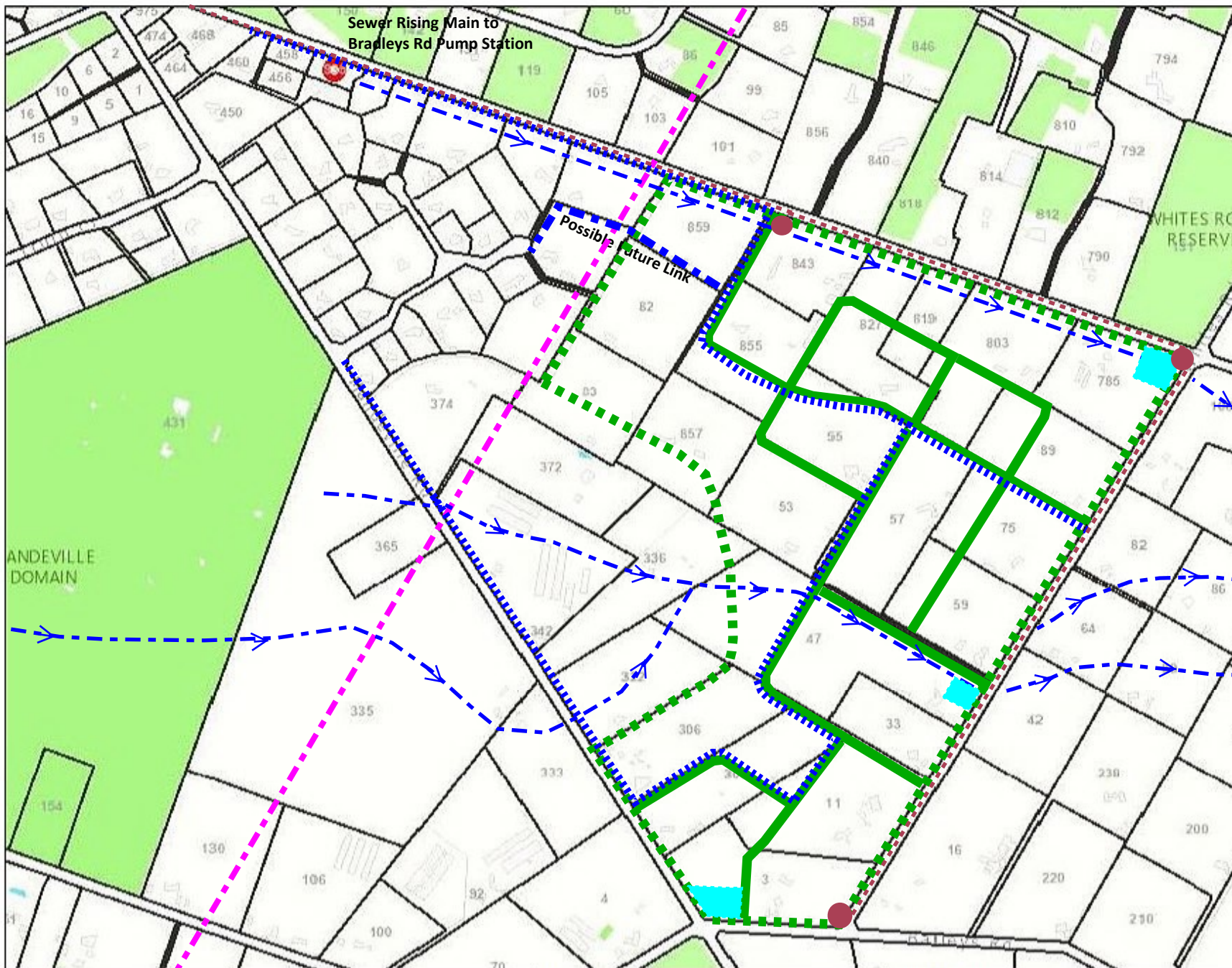
- 9 Another relevant National Policy Statements (NPS) and National Environmental Standards (NES) relating to this requested LLRZ rezoning is NES-HPL which requires a Regional Policy Statement (RPS) to identify Highly Productive Land and discourages development on HPL. A draft CRPS has recently been circulated and this shows that the requested Mandeville East LLRZ zoning is not in an area of HPL.
- 10 To address NES-CS a search of the LLUR has resulted in identifying two adjacent properties as being potentially contaminated. This is probably due to the historical use of pesticides and fungicides associated with now abandoned olive orchards. Prior to the lodging of a subdivision consent application the landowner will need to complete a Detailed Site Investigation (DSI) and potentially implement a Site Remediation Plan.
- 11 The NES-DW requires regional councils to ensure that activities' effects on drinking water sources are considered. It is likely that discharges from the existing septic tanks within the Mandeville East area have the potential to contaminate downstream wells. Rezoning the Mandeville East to LLRZ would result in these discharges ceasing as the tanks would be connected to the Mandeville Wastewater Scheme. Evidence is emerging that the level of organic and chemical contamination of the relatively shallow aquifers that are used for drinking water in the Canterbury plains is increasing and could cause harm to users. Rezoning the Mandeville East to LLRZ would result in all these properties being connected to the Fernside -Mandeville Water Scheme and eliminating this risk.
- 12 The relevant provision of the Canterbury Regional Policy Statement CRPS is policy 6.3.9 which requires any new LLRZ to be in a RRDS. However, as noted above the 2019 WDC RRDS is highly flawed and should be given little weight. It is my opinion that the criteria detailed in Section Part 2 – District-wide matters Strategic directions UFD - Urban form and development, UFD-P3 Identification/location and Extension of Large Lot Residential Zone areas should take precedence when considering requested LLRZ zoning.
- 13 As required by CRPS Policy 6.3.3 an Outline Development Plan (ODP) is required to accompany any proposed rezoning to LLRZ. A draft OPD is attached to this submission, and the full submission. The key parameter is that there would be an average site density of one residential unit per 5,000m², or 2 units per hectare. The development of the ODP has focused on the following features being incorporated into the ODP:
- Only one road off Tram Road, and this is located at the position of an existing right of way.
 - No new accessways off Tram Road, although some may be relocated.
 - There are already a significant number of accessways off Whites Road and Mandeville Road, but it is anticipated that almost all new lots would be serviced from the new internal roads.
 - The speed environment for the internal road network would be 50 km/hr.
 - All other roads servicing the LLRZ are off Whites Road, Baileys Road, or Mandeville Road.
 - Pedestrian / cycle links within the LLRZ and connectivity to the Mandeville shops and sports centre.
- 14 The requested LLRZ rezoning would result in the creation of approximately 150 new lots, and this would have an impact on the roading network, water network and wastewater network. The Officers Report notes that there is capacity in the Fernside - Mandeville Water Scheme, but not the Mandeville Wastewater Scheme. The WDC Mandeville Wastewater AMP does not align with this conclusion. In accordance with the WDC Code of Practice all buildings and hardstand areas on each lot are required to install approved design soakpits to dispose of stormwater.
- 15 The implementation of the subdivision(s) will require a wide range of services to be constructed and would include the construction of new roads and rights of way (with footpaths where required), the installation of water pipes within the development area and connection to the existing Fernside – Mandeville water scheme, the installation of pressure sewer pipes, pump chambers and connection to the existing Mandeville

wastewater scheme, the construction of stormwater channels in the road reserves, construction of road crossing culverts, the realignment of flow channels, and the construction of stormwater management areas, the installation of underground power supplies, the installation of fibre cable ducts and landscaping. The configuration and size of these are matters that are dealt with at subdivision resource consent stage. It is anticipated that a specific development contributions regime will need to be established to fund the required water, wastewater, and roading infrastructure to service the Mandeville East LLRZ.

- 16 In accordance with the WDC Code of Practice any new lots would be required to install a large potable water tank, and an approved wastewater holding tank with its self-contained pump system. Each lot is required to have a contract with an approved wastewater contractor to maintain the wastewater system. All buildings and hardstand areas on each lot would be required to install approved design soakpits to dispose of stormwater to minimize the change in the runoff from each lot. Avoidance of these overland flow paths to construct dwellings on 5000m² lots is a common practice in rural and rural residential developments.
- 17 Data from the Natural Hazards Interactive Viewer shows that some of the properties may be subject to low hazard levels of flooding. Avoidance of these overland flow paths to construct dwellings on 5000m² lots will be simple and is a common practice in rural residential developments. In addition to maintaining these flowpaths it may be necessary to provide flow attenuation / treatment in Stormwater Management Areas. The configuration and size of these are matters that are dealt with at subdivision resource consent stage. There are no other known natural hazards.
- 18 Feedback from the WDC Plan Development team has been that the primary greenspace and recreation area in the Mandeville area is the Mandeville Sports Ground located on Mandeville Road, and no further greenspace facilities would be required because of a rezoning to LLRZ.
- 19 The rezoning of Mandeville East to LLRZ could result in the creation of up to 150 new lots which will result in an increase in traffic movements in the local network. This is a small percentage of total traffic movements in the local network but will contribute to an incremental decrease to the functionality of the network. This is an ongoing issue for WDC, and the existing WDC Development Contributions framework already has provision for new lots contributing to improvements to the wider roading network. At the time of lodging subdivision resource consent application, it will be necessary for the applicants to prepare an Integrated Traffic Assessment (ITA). The ITA will provide guidance on whether there will need to be improvements to the road network outside the Mandeville East LLRZ.
- 20 The requested Mandeville East rezoning from RLZ to LLRZ will result in minimal change in the use of the land from its current use. A LLRZ zoning will not preclude small scale primary production or activities reliant on the natural and physical resources of the environment but will be a more efficient use of the land compared to the current inefficient use. The change to a LLRZ zoning will not be inconsistent with the area surrounding the site as the site does not lend itself to primary production activities currently due to its relatively small area. The proposal will therefore maintain the existing character and reflect the existing activities surrounding the existing sites. Rezoning Mandeville East to RRLZ would reduce the risk of contamination of existing aquifers and reduce the risk of water borne contaminants affecting the residents. A Mandeville LLRZ would provide a high quality semi residential environment that is well located to both existing services and Christchurch and help meet the current demand for such properties in Waimakariri District.
- 21 Thank you for the opportunity to present this submission.

Martin Pinkham

18 July 2024



Issue:	Date:	Drawn:	Notes:
A	20/6/24	MJP	Draft 1
B			

- - - Outline Development Plan Area
- Existing Road
- - - Transpower HV
- Proposed Road
- - - Overland Flow Path
- Stormwater Management Area
- ▨ Pedestrian Link
- Sewer Pump Station
- - - Sewer Rising Main

Scale 1:8,000 (A4)

Appendix K

Adderley Projects Ltd 11 Magnate Drive, Kaiapoi Phone: 021 548 751	Notes:	Project: WDC Proposed District Plan	Sheet Title: Mandeville East LLRZ Outline Development Plan	Drawing:	7051
	1			Sheet:	1
				File:	7051S1IssueA