

SUBMISSION

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To: Selwyn District Council

Submission on: Plan Change 32

From: North Canterbury Province of Federated Farmers of New Zealand

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Federated Farmers would like to be heard in support of this submission

SUBMISSION TO SELWYN DISTRICT COUNCIL ON PLAN CHANGE 32

1. INTRODUCTION

- 1.1. North Canterbury Federated Farmers welcomes the opportunity to submit on Plan Change 32 to the Selwyn District Plan.
- 1.2. 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.
- 1.3. 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:
 - 1.3.1. Our members may operate their business in a fair and flexible commercial environment;
 - 1.3.2. Our members' families and their staff have access to services essential to the needs of the rural community; and
 - 1.3.3. Our members adopt responsible management and environmental practices.

2. GENERAL SUBMISSIONS ON PLAN CHANGE 32

- 2.1. We congratulate Selwyn District Council on producing a plan change that seeks to achieve rational, effects based management of rural residential subdivision. We appreciate in particular the obvious effort made to enable development and choice, while managing undesirable effects such as inefficient use of infrastructure and reverse sensitivity effects. The remainder of our submission includes requested changes that we hope are helpful in furthering this overall purpose.
- 2.2. We note that subdivision for larger lot sizes (4 ha in the lower plains area and 20 hectares in the upper plains and Malvern areas), is outside the scope of this plan change. This type of subdivision is appropriate in the rural environment and should be able to continue to provide for those who wish to undertake legitimate primary production activities, but do not require very large allotments associated with 'traditional' pastoral farming. There are a variety of primary production activities carried out on small landholdings in Selwyn District, including specialty fibre, tree crops, horticulture, livestock breeding, and intensive lamb production, and there is no reason to hinder hardworking and productive members of society in continuing to acquire small landholdings in rural areas if suitable 'rural residential' land is available for lifestyle purposes.

Relief Sought:

2.3. Amend Plan Change 32 as appropriate to better enable development and choice, while managing undesirable effects such as inefficient use of infrastructure and reverse sensitivity effects.

2.4. Keep subdivision into larger lot sizes of 4 – 20 hectares outside the scope of Plan Change 32.

3. TABLE A4.5 TOWNSHIPS AND ZONES – USE OF ZONES

3.1 The amended table notes that the intensification of rural land to Living 3 is to be undertaken in a way that *avoids* unconsolidated urban sprawl and other adverse effects. We agree that the words *inefficiencies in the provision of infrastructure and services, loss of rural character and reverse sensitivity effects* reflect the key issues with new urban and rural residential development and seek that they are retained. We are concerned however that the very strong proviso ‘avoid’, combined with the vague ‘unconsolidated urban sprawl’ creates potential confusion and conflict over what is expected. We suggest the last sentence of paragraph 8 (page A4-012) is amended to be more certain.

Relief Sought:

3.2 Amend the last sentence of paragraph 8 (page A4-012) to read:

‘The intensification of rural land to Living 3 Zone densities is expected to be through a comprehensive plan change process to ~~avoid unconsolidated urban sprawl,~~ manage urban and rural residential development in a way that prevents inefficiencies in the provision of infrastructure and services, loss of rural character, and reverse sensitivity effects.

4. OUTSTANDING NATURAL FEATURES AND LANDSCAPES

4.1 Issues pertaining to Outstanding Natural Features and Landscapes (Page B1-031) are proposed to be amended to incorporate the development of the Living 3 Zone. Federated Farmers notes that Outstanding Natural Landscapes are argued by some parties to cover extensive areas and requirements around subdivision and development can become very restrictive in them. Accordingly, Objectives and Policies related to this Issue should not unduly restrict sustainable development on the edges of existing settlements even if they are in an Outstanding Natural Landscapes because:

- Landscape values are likely to be already compromised in the vicinity of settlements;
- Restrictive controls on building and subdivision can mean that the fringes of existing settlements are, for most people, the only cost effective option for further development.

Relief Sought

4.2 Ensure that Objectives and Policies that address Issues pertaining to Outstanding Natural Features and Landscapes do not unduly restrict sustainable development on the edges of existing settlements.

5. QUALITY OF THE ENVIRONMENT

5.1 Plan Change 32 includes a new Objective B3.4.6 and Policy B3.4.3 which relate to the quality of the environment.

5.2 Objective B3.4.6 restricts rural residential activities to 200 households over the entire district per decade for the next 25 years. It is not clear how this arbitrary limit furthers the purpose of the plan change. If less than 200 rural residential lots are required during each given time period, this provision will be meaningless, but if more than 200 rural residential lots are required, unsustainable outcomes will result as the price of rural residential lots become artificially elevated and individuals who want a semi-rural lots for lifestyle purposes continue to utilise large lots of 4 – 20 hectares. In fact the '200 limit' may have the opposite of the intended effect by creating an impression of scarcity that enhances demand.

5.3 Objective B3.4.6 includes the outcome: *...avoid the cumulative loss of productive rural land and rural character that will result from incremental rural residential development...* This outcome creates unrealistic expectations of what can be achieved because any change can result in a perceived loss of rural land or rural character and therefore it is impossible to avoid some cumulative loss over time.

5.4 Objective B3.4.6 includes the outcome: *...Avoid incompatible amenity expectations between different land uses, particularly between rural residential living environments and the sensitive boundary interfaces of the Living 3 Zone with Townships and Rural Zoned Land.* This outcome is not realistic because amenity expectations will always differ, particularly on the interface between rural and urban areas. Practically speaking Objective B3.4.6 can only be achieved if the Council does not have regard to the amenity expectations held by some, which is clearly inappropriate.

5.5 The need to avoid unnecessary constraints on the use of land for primary production is discussed in the explanations and principle reasons to Objective B3.4.6, but not the text of the Objective. It would be appropriate to provide for primary production activities alongside other important activities such as strategic infrastructure, quarrying, electricity transmission, waste water treatment plants and so on. The need to avoid unnecessary constraints on primary production also requires address in proposed Policy B3.4.3.

Relief Sought

5.6 Remove the arbitrary limit of 200 residential lots per decade from proposed Objective B3.4.6.

5.7 Remove the desired outcome of: *Avoid the cumulative loss of productive rural land and rural character that will result from incremental rural residential development...* from proposed Objective B3.4.6.

5.8 Remove the desired outcome of: *Avoid incompatible amenity expectations between different land uses, particularly between rural residential living environments and the sensitive boundary interfaces of the Living 3 Zone with Townships and Rural Zoned Land...* from proposed Objective B3.4.6.

5.9 Provide for primary production activities alongside other important activities within the text of Objective B3.4.6 and Policy B3.4.3.

6. SUBDIVISION

6.1 Federated Farmers approves of the pragmatic approach taken with Policy B4.2.13 which requires that potential adverse effects of development are avoided, remedied or mitigated (Refer to amendment 80).

6.2 The list of assessment matters for rural residential matters (amendment 119), includes the criteria *preserve view shafts to the Port Hills*. Federated Farmers maintain that 'view shafts' are not required to achieve the purpose of Part II of the RMA, are an arbitrary allocation of value from one property owner to another, and will become an inevitable source of conflict as existing residents use 'preserving the view shaft' as a justification to halt further development that is required to achieve sustainable growth of townships (thus undermining the purpose of Plan Change 32). We strongly recommend that consideration of viewshafts is removed from proposed Plan Change 32 as the risks of including them outweigh the benefits.

Relief Sought

6.3 Retain the broad terminology of avoiding, remedying or mitigating in proposed Policy B4.2.13.

6.4 Remove 'view shafts' as an assessment matter under proposed Rule 12.1.4.85.

Neil Stott
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