

From: MDCSendmail@mackenzie.govt.nz
Sent: Wed, 23 Nov 2022 07:26:35 +1100 (AEDT)
To: District Plan
Subject: Mackenzie District Council - Submission on Proposed Plan Change to the Mackenzie District Plan
Attachments: PC21-District-Plan-Submission-Mackenzie-A-and-P-Association.docx

A new Submission on Proposed Plan Change to the Mackenzie District Plan has been received.

Plan Change Number

Which Plan Change number?: 21

Details of Applicant

First Name: Mackenzie
Last Name: A and P Society
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Date: 2022-11-23 00:00:00
Customer number (if known):
Contact person: Jodi Payne
Contact person Telephone No: 021713033

Submission Details

The specific provisions of the Proposal my submission relates to are as follows: Please refer to attached document
I support / oppose these provisions: I oppose in part
The reason(s) for my submission are: Please refer to attached document
I seek the following decision from the Mackenzie District Council: Please refer to attached document
I do or do not wish to be heard in support of my submission: I do
If others make a similar submission I would or would not be prepared to consider presenting a joint case with them at any hearing: I would
Additional information for this submission:

Attach a supporting document:

PC21-District-Plan-Submission-Mackenzie-A-and-P-Association.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 1.7 MB

**SUBMISSION ON PROPOSED PLAN CHANGE 21
TO THE MACKENZIE DISTRICT PLAN (SPATIAL PLAN IMPLEMENTATION)**

Clause 6 First Schedule, Resource Management Act 1991

TO: Planning Manager
Mackenzie District Council
PO Box 52
Main Street
FAIRLIE 7949

By email: districtplan@mackenzie.govt.nz

Name of submitter:

- 1 Mackenzie County A&P Society
Address : PO Box 53
Fairlie 7949
- Contact: Jodi Payne
- Email: mackenzieapsociety@gmail.com

Trade competition statement:

- 2 Mackenzie County A&P Society could not gain an advantage in trade competition through this submission.

Proposal this submission relates to is:

- 3 This submission is on proposed Plan Change 21 (Spatial Plan Implementation) to the Mackenzie District Plan (PC21), which forms part of Stage 2 of the Mackenzie District Council's (Council's) review of the Operative Mackenzie District Plan (District Plan).

The specific provisions of PC21 that this submission relates to:

- 4 This submission relates to the proposed zoning changes suggested by PC21, as they relate to the Mackenzie County A&P Society (the Association).

District Plan Submission

Introduction

- 5 The Mackenzie County A&P Society....

The first Mackenzie County A&P Show was held in 1899. The Mackenzie A&P Society is affiliated with The Royal Agricultural Society, which was established in 1924 and is one of the few organisations in New Zealand with a "Royal" charter. With the support of the Royal Agricultural Society of New Zealand (RAS), the Mackenzie A&P Show promotes the development of agricultural, pastoral, horticultural, stock-raising and forestry resources in the South Canterbury Region. The initial purchase of grounds for the Show (32 acres) was made by the Society in 1908 with more land being added over the years as

the Show grew. The Mackenzie Highland A&P Show is the largest one day A&P Show in New Zealand bringing approximately 15,000 people to town each year.

Spatial Plan Consultation

6 As part of the Spatial Plan consultation held during 2021 and 2022 members of the Committee had numerous discussions with the project team about the history of the Association and Committee concerns about the potential rezoning of the Showgrounds. Of particular concern to the committee were the following:

- The rating implications of re-zoning.
- Limits on what the Association is able to do with the Showgrounds as a result of new zoning and potential rule changes that come with different zones.
- Proposed Walking/Cycling Trail

Existing Situation

7 The Showgrounds is currently zoned Rural, with a connection to Council's reticulated water supply network. The current zoning is shown below in Figure 1.



Figure 1 – Current Zoning of the Showgrounds and surrounding area. The Showgrounds are outlined in orange.

The Showgrounds are held in two titles, with the western part of the Showgrounds used for farming purposes for the majority of the year and then used as carparking on Show Day. The middle section holds the majority of the functional buildings that are used by the community during the year for various activities, along with the show ring. The eastern part of the Showgrounds is used for dog trials and parking on Show Day.

Proposed Zoning

- 8 The proposed zoning changes for Fairlie were released following the Spatial Plan process. The proposed zoning for the Showgrounds as part of the Spatial Plan is provided below in Figure 2.

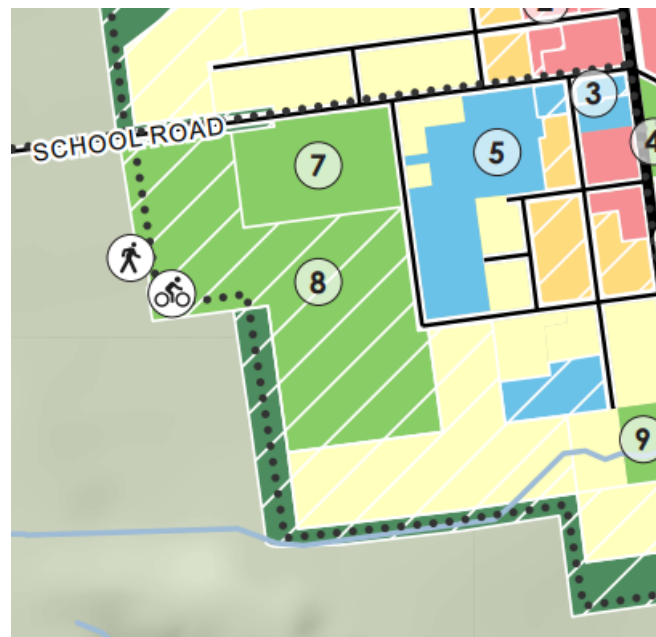


Figure 2 – The proposed zoning for the Showgrounds released as part of the Spatial Plan process. The green area is Open Space, with the eastern part of the Showgrounds showing as Low Density Residential. A walkway is proposed around the perimeter of the carparking paddock.

It is noted that the notified ePlan does not contain all of this rezoning. Namely, only the eastern part of the Showgrounds has been rezoned to Low Density Residential as notified. The notified zoning changes in PC21 are demonstrated in Figure 3.



Figure 3 – Notified Zoning changes from the ePlan demonstrating only the eastern part of the Showgrounds is to be rezoned as part of PC21 to Low Density Residential.

9 We assume the proposed additional zone changes will be made as part of Stage 3 of the District Plan Review. As a consequence, we note there are some difficulties in providing an all-encompassing submission on the zoning that applies to the Showgrounds and the implications it will have for the Association. Further submissions will be provided as part of Stage 3 of the District Plan Review. It is considered that Stage 3 of the District Plan Review may provide a better mechanism for comment on the implications of the Zone changes as more detail of the applicable rules to the Showgrounds are available.

Effects of the Proposed change to Low Density Residential Zoning

10 The proposed change to the eastern part of the Showgrounds will potentially have a significant impact on the Association. The proposed zoning to Low Density Residential will impact on the value of that part of the Showgrounds which will have a flow on effect to the rates payable by the Association to the Council. This in turn will have an impact on the ability of the Association to support the community as it will have a negative financial implication.

11 It is noted in the Proposed Rules for Low Density Residential that there is not an easy fit for the activities that take place at the Showgrounds. It is not considered that the activities carried out by the Association fit the definition of a 'Community Facility'. This definition states: "Community facility means land and

buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility.” It is noted that “Recreation Activity” is not defined by the Proposed District Plan. Therefore, it is considered that any changes carried out by the Association on the land classed as Low Density Residential are likely to be classified as an Activity Not Otherwise Listed (LRZ-R14). Which will require a Discretionary Activity Consent to be applied for. It is noted there are no specified matters of discretion which leaves Council with a wide ambit of control over anything the Association could do on the land. It is noted that Buildings and Structures Not Otherwise Listed are Permitted Activities provided they meet the listed Standards (LRZ-R3), however as the associated activity with the building will fall within LRZ-R14 it is not considered that this is of much benefit to the Association.

Decision sought by the submitter

- 12 It is understood that the zoning changes need to reflect the National Planning Standards. There is not an easy zoning choice within the National Planning Standards that encompasses the activities carried out by the Association at the Showgrounds. With no rules available for the Open Space Zones (Due in Stage 3) it is difficult to ascertain whether these rules will be more favourable to the Association. The Mixed Use Zone is also not considered to be appropriate for the site as it would require more onerous standards in terms of landscaping along the boundary with residential neighbours and the activity status for any development is no different from the Low Density Residential Rules for the activities the Association carries out on the Showgrounds, a Discretionary Activity consent would still be required.
- 13 In reviewing how other Councils have zoned land owned by local A and P Associations the following is noted:
- The Proposed Selwyn District Plan has the Ellesmere Showgrounds zoned General Rural Zone,
 - Christchurch City Council has the Canterbury Showgrounds zoned Open Space Metropolitan Facilities Zone,
 - Ashburton District Council has the Ashburton Showgrounds zoned as Residential C but the Showgrounds are listed as a Scheduled Activity.
- 14 The best definition for a Scheduled Activity was found within Subchapter 6.5 of the Christchurch District Plan. This states: Sub-chapter 6.5 Scheduled Activities relates to the management of scheduled activities throughout the district. Scheduled activities are specific established activities that are not generally anticipated by the underlying zoning. The provisions of this chapter recognise the benefits provided by such activities by enabling their ongoing operation, rebuilding, redevelopment and limited expansion, in a manner that maintains or enhances the amenity values, character and natural values of

the adjoining environment. Scheduled activities are wide ranging, and include community facilities, spiritual activities, cultural activities, service stations, holiday parks, taverns and public utilities.

15 It does not appear through the information available that Scheduled Activities are now permitted by the National Planning Standards. However, if Scheduled Activities can be provided for we would ask that this apply to the Showgrounds. If Scheduled Activities are able to be provided for we would suggest the example set by the Ashburton District Council is considered the most practical solution for the Association. This specifies Standards that apply to each site, with specific reference made to sites where applicable. For instance, the following is a screenshot of the rules that apply to 'Public Recreation Facilities' for Site Coverage and Surfacing (Note, Ashburton Showgrounds are considered a Public Recreation Facility)

8.6.2.7 Building Coverage

a) For the sites listed below, a single building shall not exceed 100m² in total floor area. The combined total area of all buildings on site shall not exceed a maximum of 5% of the total site area. These standards are exclusive of children's play equipment.

- Collegiate Football Club
- Allenton Sport Club
- MSA Bowling Club
- Mid Canterbury Basketball Association
- Hampstead All Sports Club (including former Hampstead Bowling Club)
- Ashburton Celtic Football Club
- Collegiate Football Grounds

8.6.2.8 Surfacing

a) The site coverage by hard surfacing, including courts, footpaths, swimming pools and car-parking areas, shall not exceed:

30%	20%
Collegiate Football Club	Allenton Rugby Football Club
Allenton Sport Club	Tinwald Family Sport and Recreation
MSA Bowling Club	Ashburton Showgrounds
Mid Canterbury Basketball Association	Ashburton Racecourse
Hampstead All Sports Club (including former Hampstead Bowling Club)	Tinwald Golf Club
Ashburton Celtic Football Club	Ashburton Golf Club
Collegiate Football Grounds	Mayfield Golf Club
	Methven Racecourse
	Rakaia Golf Club
	Methven Golf Club
	Mania-o-roto Park

Figure 4 – Screenshot of the Ashburton District Plan, excerpt from Scheduled Activities Chapter.

16 Failing that, applying a Specific Control Area to the Showgrounds (in its entirety) is considered the next best alternative. We would consider the following as appropriate standards to apply to future development:

- Maximum building height of 10metres,
- Road and internal boundary setbacks of 2metres, compliance with Height in Relation to Boundary Standards would be required though,
- The ability to carry out public recreation activities (noting the difficulties with this definition but it is the closest fit available) on site as a Permitted Activity,
- No inclusion of impervious surface coverage in site coverage percentages.

Conclusion

17 There are a number of difficulties that arise from rezoning the Showgrounds, particularly by proposing to split the zoning of the site. In conjunction with these difficulties, it is noted that the National Planning Standards do not provide a fit for purpose zoning for activities carried out by organisations like the Mackenzie County A&P Society. The Association has a long-standing history with the Mackenzie District and is the largest one day show in the Southern Hemisphere. It is considered very unlikely that there will be a significant shift away from the activities that are carried out on the Showgrounds in the short to medium future. Therefore, we would ask that the Council reconsider how the Showgrounds are being rezoned in this instance and provide some further protection for the activities that are carried out on site.

Prepared by:

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Planner

19 November 2022