

APPENDIX 18

ADJOINING NEIGHBOUR FDS SUBMISSIONS

Job Ref: 24160

17 December 2024

Hastings District Council
via email: s 9(2)(a)

Submissions to the Draft Napier – Hastings Future Development Strategy (FDS)

StradeGY has been engaged to prepare a submission for the Draft Future Development Strategy (FDS) on behalf of s 9(2)(a), partial owners of land within the FDA area identified as HN3a.

The Submitter wishes to be heard to speak to this Submission.

The Submission is for Area HN3a to be retained within the FDS:

The reasons for the submission to retain area HN3a are outlined and discussed below:

- Not within a hazard risk area identified on FDS Mapping.
- Borders existing urban areas of Havelock North along three boundaries and will not result in the fragmentation of Plains Production land, nor increase risk of reverse sensitivity given the adjacent existing and future land use activities.
- Adjacent to current urban growth areas (Iona/Bull Hill Development)
- Proximity to existing Public Transport Network (HN3a is within 50m of an existing bus stop) and collector roads
- Not restrained by Infrastructure servicing, with only onsite stormwater solutions to be considered
- LUC classification 3, noting that Central Government has yet to enact removal of LUC 3 from the NPS-HPL. HN3a is LUC3 and in comparison, to other sites with higher more valued LUC (1 or 2), which we suggest should be afforded higher HPL value and warranted less viable for urban expansion than HN3a.
- The land within HN3a is held by only two separate owners. This lack of fragmented ownership enables effective and efficient land development, infrastructure and Structure Planning, in comparison to other areas retained within the Draft FDS that are fragmented into multiple ownerships.
- Support yield to meet projected population growth and housing needs.

HN3a is currently zoned Plains Production and identified as HPL land containing 21.14ha with the capacity to support approximately 220 dwellings. The NPS-HPL directs Territorial Authorities to restrict the rezoning of HPL unless it can meet a number of provisions set out in the Policy Statement. HN3a was included in HPUDs as a Reserve Area only and has also been excluded as viable greenfield



development land under the Draft FDS via voting by the Joint Committee, having been recommended for retention by the reporting Officer.

Soils Classification:

Consideration of Appendix 1 – Thematic Constraints Mapping identifies the land areas mapped as category LUC 1, 2, or 3, for greenfield development within the Draft FDS and it is apparent any rezoning of land for future greenfield development will be for land identified as HPL. The HN3a site has merit to meet the requirements of the NPS-HPL test and to be released from HPL provisions. We acknowledge previous resource consent applications for subdivision undertook soils analysis on the site which has acknowledged the site does have productive potential. We note that all greenfield development areas in Hastings identified for inclusion in the FDS are HPL and therefore HN3a should not be excluded based on the productive land aspect alone.

Hazards:

Additionally, HN3a is located within an area that is not identified as posing a risk for flooding, coastal hazards, nor land that was directly affected by Cyclone Gabrielle which contradicts the identified key constraints for this site. Taking into consideration, constraints such as natural hazards when choosing to retain or exclude areas for future greenfield development, the risk of retaining HN3a in the FDS poses less risk in comparison to other sites which have been retained (i.e. H3 Kaiapo Road – severe flooding and ponding risks, NC4a The Loop and NC4b Riverbend which would require far more extensive stormwater investment than HN3a, and within a hazard risk zone, for examples).

Land Supply / Urban Integration:

Support for HN3a to be retained in the FDS will provide suitable and practical greenfield land over the medium to long-term residential development needs. HN3a borders existing residential development along three of its borders with access to two primary collector roads (Middle Road and Te Aute Road). Proximity to Havelock North and other arterial transport routes, as well as the future expansion of the public transport network, HN3a is a feasible option which will not compromise HPL when taking into account other identified sites, nor directly borders land parcels that gives rise to reverse sensitivity issues. HN3b was also excluded from the Draft FDS, and we note that HN3a is an important site to progress the feasibility for inclusion for HN3b to not result in fragmentation of currently zoned Plains Production land.

Ready access to services, onsite stormwater management opportunities, close to Havelock North Town Centre enable effective and efficient urban integration (transport, walkability, pathway and corridor opportunities), limited additional infrastructure investment and efficient use of existing infrastructure capacity/

Population Growth Supply / Demand Analysis:

The Draft FDS states projected population growth for the Hastings/Napier area will require approximately 7480 dwellings provided by greenfield housing over a 30-year spatial planning timeframe. The yield currently retained provides for approximately 3910 dwellings over the same spatial timeframe. We note here, a 48 % shortfall of greenfield dwellings required to meet the projected growth anticipated. In comparison, 3544 potential dwellings across 12 sites were excluded from this Draft FDS for a number of reasons. These reasons varied but were not indifferent to sites retained in the Draft FDS.



The Joint Committee minutes for the FDS did not provide sufficient detail to the direction of the voting outcome. Furthermore, the FDS divergence: important information page provided four points for the exclusion of both HN3a and HN3b:

- Firstly: these two sites were not required to meet sufficient demand. We disagree given the shortfall in yield for greenfield development as discussed above.
- Secondly: that these two sites are HPL is not considered an exclusionary justification given all sites identified in the Draft FDS are also classified as HPL. The exclusion on the basis of soils classification in isolation does not provide for balanced consideration between competing opportunities.
- Thirdly: Excluding HN3a from the Draft FDS given previous inclusion was for reserve area only is exclusionary given other sites identified as reserve under HPUDS, or sites not previously identified under HPUDS have been retained or included.
- Lastly: the inclusion of HN3a and HN3b is not contrary to the objectives of the FDS.

In summary, the HN3a site provides appropriate greenfield development, located within close proximity to Havelock North for a range of residential needs and the existing public transport options. HN3a is a sensible use of HPL for greenfield development given the existing adjacent land uses for residential activities and not encroach into existing plains production zones or sites actively used for Land Based Primary Production where conflicting activities may result in reverse sensitivity issues. The HN3a site will provide opportunity to meet projected housing needs with ability to provide for onsite stormwater solutions and in a form that compliments and contributes to a legible urban framework for Havelock North. Territorial Authorities when deciding areas for greenfield development need to take into account sites that pose the least risk from natural hazards and provide landowners certainty of future development, retaining HN3a in the Draft FDS will meet this outcome.

Yours Sincerely,

**Mischa Wild MPlan - NZPI
Planner**

s 9(2)(a)

Name: s 9(2)(a)

Address: 150 Middle Road, Havelock North.

email: s 9(2)(a)

17 December 2024

***Re: Submission to the Draft Napier Hastings Future Development Strategy (FDS)
I would like the opportunity to be heard in support of this submission***

This submission is in relation to supporting the inclusion of the property at 150 Middle Road, Havelock North, into the Napier Hastings FDS.

I have lived at the property at 150 Middle Road since 1972 (52 years). The property comprises 4 hectares of flat land and whereas in the 1970's and 80's it was possible to productively farm this land for a modest income, over recent decades this small landholding has become economically unviable and non-productive due to the following reasons:

- The landholding is too small for contract cropping. I have approached the main cropping land leasing companies several times over recent years (Bostock NZ, Brownriggs, Apatu Farms, Mike Kettle Contracting) and all have declined any interest in leasing or cropping this land due to the small and uneconomical size of the block.
- The landholding does not have a commercial well or water take consent (only a 50mm domestic-supply well) and it is not commercially viable to install a commercial well. Resource consent approval is also very unlikely for a new water take in this area due to the TANK Plan Change and the over-subscription of existing water consents.
- The landholding is also too small and uneconomical for permanent crops like apples or kiwifruit coupled with the fact that there is no commercial water take consent.
- The significant increase in the rate levies on the property (between HDC and HBRC) also makes any potential land lease income from the property unviable as any such lease income is well below the cost of the annual rates.

In addition to this land being unproductive to farm, due to the Iona subdivision of the elevated land immediately adjacent to this flat land, the following issues further exacerbate the non-productivity of this land:

- Increased surface flooding and inundation due to increased water catchment and overflow from the higher-level subdivision in Iona Road. Evidence of increased surface flooding has occurred in recent rain events from the rural subdivision, Stableford Park, immediately across the road. Photos are available as evidence of recent run-off flooding.
- With the further development of the Iona subdivision area, this flooding risk will be significantly unincreased unless a complete flood mitigation plan is implemented across this flat land area through to the Karamu Stream catchment.

- Pest control on the land through controlled shooting of rabbits, possums, stray cats etc can no longer be achieved due to the urban subdivision immediately across the road.
- Broadcast spraying of thistle, blackberry and the potential for saffron thistle control which is becoming more prominent in the Iona area, will be greatly restricted due to the adjacent urban built-up area.
- The potential for greatly increased stock disturbance and worrying of sheep by domesticated and/or stray dogs from the urbanisation of the Iona area also presents a material risk to running livestock on this land.

Due to the uneconomical size of this flat land area, it is ideally suited for urban subdivision for the following economic and environmental reasons.

- The land is flat and not adjacent to any natural hazards (i.e. no risk of rising sea levels or tsunamis, not situated on a river flood plain, not prone to slippage or land subsidence).
- The land will be subject to run-off flooding from the adjacent Iona subdivision (a man-made hazard), unless a comprehensive stormwater plan is implemented across this land as part of an overall subdivision plan from the Iona subdivision across to the Karamu Stream. This is the natural water course for any stormwater runoff from the Iona subdivision and will ensure that the necessary storm water design can be fully implemented across the wider subdivision area, therefore mitigating any potential run-off stormwater flooding events.
- The property is adjacent to town services (water, sewage etc) with good roading. This flat land area will therefore be very economical to subdivide and will make efficient use of existing council services and is naturally bounded by Middle Road and Gilpin Road providing a logical southern boundary to urban to Havelock North.
- This area will support the forecasted growth with potential upside growth in the Havelock North area which is where greater urban growth is expected by the market. Havelock North is where people want to live and by providing easily subdividable land, this will help to ensure the supply of cost-effective sections to meet this demand. The current FDS provides for very few sections in Havelock North for future growth.
- The subdivision of uneconomical lifestyle blocks, exactly what this block of land now represents, is supported by land protection groups like Save the Plains Group. Cited as a more prudent use of non-productive land than other larger greenfield sites that are more prone to natural hazards, have greater financial productivity potential or have significantly higher subdivisional costs due to natural hazard mitigation costs.

Having lived in what was a rural environment for over 50 years, this quality of life and any rural aspect to our property has now been fully lost due to the urbanisation of the land within the adjacent Iona subdivision and as well as the retirement village area on the opposite end of our land on Te Aute Road.

The high council rates burden on the property now means that the land has become a significant financial liability with no commercial reality for productive use of the land to offset the high rates cost.

This area is no longer a quite rural setting; rather this property is now surrounded in urban subdivisions. So what was once the primary reason we purchased the property, has now been taken away from us, and so has our right to rural quiet enjoyment.

I therefore strongly support that this land is included in the Napier Hastings FDS for future urban subdivision.

I would like the opportunity to be heard in support of this submission.

From: s 9(2)(a)
To: [Policy Team](#)
Subject: Middle & TeAute Road Subdivision
Date: Monday, 16 December 2024 3:00:06 PM

Dear FDS ,

s 9(2) and I feel our land is no longer viable to use for orcharding or cropping, it's far too small to make a living. We used to have some of the land in plums but removed them because the operational costs were higher than the income.

Sent from my iPad We agree with the land being included into the subdivision as it makes sense as it's close to the village. We feel the land is flat & easy to build on. Has good road access also would be easy to continue bringing the infrastructure along Te Aute Road. We won't be able to burn hedge trimmings when the housing goes ahead in Middle Road as people will complain about the smoke. We have a problem with thistles and have to spray them, neighbours will probably complain about spraying as well. The land should be free from flooding once the drainage is completed in the Middle Road/ TeAute Road block. The land has amazing views of TeMata Peak and would make very desirable blocks to build on. s 9(2) wishes to speak at the meeting if you have one. Yours Sincerely Robert and Nicky Gardner. () Could you please confirm that you received this email thank you.

14/12/2024

s 9(2)(a)

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fully support the Middle Road/Te Aute Road up to Gilpin Rd inclusion in the FDS.

As past orchardist/Graziers and responsible kiwis we completely get the need to retain Heretaunga Plains highly productive land. However as noted it is subject to surface flooding and there have been instances in this block that have made some practices unviable.

The other big issue is multiple ownership/title and the size of these ranging from 1.5/3/5x2/7.5/10x4/20/25 acres. How anybody including regional council can prove to all that there is a sound – financially way of realizing there stance IE maybe 2? Owners so they have scale (Roughly 2 owners owning approximately 55 acres each) then doing all the remedial work to remove surface flood risk risk then infrastructure work and mitigate any ongoing environment issues IE. Spray-drift / Noise / Dust is beyond me

This block collectively tick so many boxes

Housing – Absolutely

Location - Absolutely

View - Can't get much better, Our māunga Te Mata o Rongokako

Underground Infrastructure – Close

Widen Gilpin road – Doable

Mitigate our environmental issues - Done

Use excess clean fill from Iona subdivision to remedy surface flooding – No brainer