

41 Peter Rutter

Name *	Peter Rutter
Email *	
Phone Number *	
Address	Lane Road, Havelock North 4130
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes
Q1: Are these the big issues that the Reviewed Strategy needs to tackle?	Due to the whole family contracting campylobacter from the water it has not been possible to review the strategy in depth. I had requested extension of time but Mark Clewes said this would be up to the committee, so this abridged version will have to suffice.
Q2: Do you think our projections of development demand and capacity are correct?	One would seriously hope so as you are supposed to be the experts
Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?	The urban sprawl should be contained and apartments and affordable multi level housing made available within the CBD areas to encourage compact living and restrict use of motor cars, encourage use of public transport
Q4: Do you support any particular parts of the draft revised Strategy?	YES – the identification and rezoning of Brookfields to residential is strongly supported. Why destroy a character area like Iona/Lane rd– why would you identify Middle road as potential industrial land as well as wanting to rezone other side as residential?????
Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?	Re zone the area between Middle Rd and Te Aute Rd south of Upham street as residential area. This land is not very productive and has been proven unable to grow fruit trees, it currently grows only a pumpkin crop and has 6 months grazing of a few sheep. It fulfills all the protective criteria that HPUDS wishes to embody, It is ideally situated adjacent to other residential areas, is flat and close to all services. Rezoning of this area to satisfy housing demand out to 2045 would allow the Iona /Hills area to be either removed from identified greenfields growth area, or reserved until after 2045.
Any other comments that submitters wishes to make or suggested amendments:	That the area identified as Iona Triangle/ Hills area be deleted from HPUDS identified areas. The proposed development of Iona/Hills area is entirely unsuited to large scale residential development,

the land topography means that massive earthworks would be required to achieve any worthwhile housing density. The destruction of an environment that people have created over the last 25 years or so is at odds with the aims of HPUDS. The wildlife and flight corridors established by the native birds would be destroyed along with the wetlands habitat of the upper hills.

The use of flat land adjacent to town whilst seemingly at odds with HPUDs seems to be a far better use of land resource and would provide the developer a cheaper option.

As an orchardist I support the HPUDS ethos to restrict the housing sprawl onto productive land.

However I note that of recent times, many orchards have been bought as lifestyle blocks—trees removed to run a sheep/horse and donkey.!! There should be land use controls as to change of use, or HB will become one big lifestyle block.

This erosion of our productive capacity is far more serious than the rezoning of a few flatland plains paddocks

42 Maurice Smith

Name *	Maurice Smith
Email *	
Phone Number *	
Address	Wellwood Tce, Te Awanga
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes
Please upload any supporting documents here	Yes, refer below
Q1: Are these the big issues that the Reviewed Strategy needs to tackle?	See attached PDF document
Q2: Do you think our projections of development demand and capacity are correct?	See attached PDF document
Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?	See attached PDF document
Q4: Do you support any particular parts of the draft revised Strategy?	See attached PDF document
Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?	See attached PDF document
Any other comments that submitters wishes to make or suggested amendments:	See attached PDF document

Uploaded file(s):

Retirement Sector Greenfield Development Opportunities in Havelock North

*A submission by Te Aute Holdings Limited on the Draft HPUDS Revised Strategy 2016
18 August 2016*



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1 Executive Summary:

On 23 May 2016, the Te Aute Holdings (TAH) met with Lawrence Yule, Mayor of Hastings District Council (HDC) to discuss the availability of greenfield land in Havelock North to meet the increasing demand. The Mayor indicated the HDC was seeking to rezone new parcels of land (for immediate development or as reserve areas) to meet the increased demand in the area as part of the draft HPUDS revised strategy 2016.

TAH has been working with various parties including the HDC to establish the best utilisation of a 6Ha+ site it owns at 162 Te Aute Road (the Site)¹, Havelock North.

The Mayor indicated that HPUDS does not yet provide an adequate strategy or supply of land to meet the needs of the retirement sector and suggested that if the Site is assessed as suitable for greenfield growth development (either immediately or as a reserve area) then the fastest way to commercialise the Site may be to consider how the land may provide new housing options for the retirement sector.

TAH agreed to explore how the Site might be used to support the retirement sector and agreed to develop a submission for HPUDS seeking to have the Site released from its greenfield 'reserve' status and rezoned as a special retirement area available for immediate development for the 55 years+ retirement sector.

This paper summarises research with retirement sector providers, developers, builders, policy makers and councillors, and considers the recent HPUDS draft strategy to assess the suitability of the Site in meeting the greenfield housing needs of the Hawke's Bay retirement sector.

The HPUDS draft strategic review indicates that ~40% of the greenfield lots in Havelock North are required for the retirement sector – yet none of the existing greenfield growth areas in the Village are suitable for retirement sector development. Reports estimate a shortfall of 647 retirement complex units by 2016 for Hawke's Bay.

In failing to identify greenfield growth areas suitable for retirement development, the HPUDS strategy review does not address the specific requirements of the retirement sector (55 years+ population).

An opportunity now exists to create a retirement special area and develop a showcase retirement sector offering that will mitigate retirement market demand without compromising other greenfield sites and amenities. The 6.1 ha site at 162 Te Aute Road, Havelock North is considered ideal for rezoning and development for the retirement sector as a special retirement area for the following reasons:

- The close proximity to Havelock North Village, highly accessible social infrastructure and public transport, its size (6Ha+), the flat terrain and the ability to meet intensification requirements of 20+ dwellings per Ha.
- The land complies with all HPUDS strategy, policy and regulatory requirements for development and will enhance the urban living environment for Havelock North.
- The land has minimal new infrastructure requirements, can easily connect to existing water and sewage services and HDC service agreements are in place.
- The land is suitable for low impact urban design and can integrate into existing Hawke's Bay Regional Council wetland planting and ponds adjacent to the site.
- Developing the land would open up access to the Te Karamu cycle, walk and waterways and meet local community requirements for better access to recreational areas.

We submit that the HPUDS strategy be amended to rezone the Site as a special retirement area, specifically catering for the Retirement Sector (55+ age bracket).

¹ See Figure 1 on page 5

2 The demand for retirement housing in Hawke's Bay & Havelock North is far greater than the supply of suitable greenfield lots

The HPUDS draft strategic decision to rezone additional greenfield development areas in Havelock North recognising the increase in demand for lots in the area is commendable, **but does not provide for the specific needs of the retirement sector.**

The population of the region is aging with a significant shift in age profile over the next 30 years, and even further beyond which sees the 65+, 75+ and 90+ age groups increasing by 94%, 172% and 286% respectively. By 2034, the 65+ age group will account for at least 25% of Hawke's Bay's population.²

Research by Sean Bevin³ has concluded there are extensive waiting lists for all of the retirement villages in Hawke's Bay. By the end of 2016, it is estimated there will be a shortfall of 647 retirement complex units. This figure only includes the demand required in retirement complexes which make up only 10% of where elderly live in Hawke's Bay.

HPUDS Retirement Sector Demand Forecasts 2016 – 2045 show a future demand for approximately 140 hectares of retirement land over the next 30 years (to 2045) for new development providing for approximately 3,340 new retirement units (up 75% since the 2010 HPUDS assessment). The demand will be for predominantly flat greenfield sites of 6 Ha or greater. This is expected to be maintained for the next 50 years.

It is estimated 40% of all new build housing in HPUDs until 2045 will be utilised by the retirement sector – and it is essential that greenfield land made available, is suitable to meet the specific requirements of the retirement sector.⁴

Havelock North and Taradale/Greenmeadows are the preferred retirement locations in Napier-Hastings and the 65+ age-group will be over represented in this area compared with the rest of Hawke's Bay.⁵ Havelock North is a well-regarded area by the retirement population and existing retirement villages all have significant waiting lists.

2.1 Retirement sector developing and housing requirements

The New Zealand Positive Aging Strategy⁶ outlines the requirements for retirement sector housing as:

- A range of affordable and appropriate housing options for people over 55 years
- Land should be flat and ideally located within walking distance to social infrastructure (shops, banks, supermarkets, medical and community services).
- Lands should provide good access to affordable and accessible transport
- Developments should mitigate "social isolation" and ensure older people feel safe, secure and can "age in place", while being integrated into the community.
- Housing to be well insulated, low maintenance and highly energy efficient to mitigate the health and income issues of the retirement sector. Housing should have a smaller footprint and use

² 2014 Report on the Positive Aging Strategy, Ministry of Social Development

³ Proposed Retirement Complex in Havelock North, The Market (Demand/Supply) Basis for the Project, May 2007, Sean Bevin, Economic Analyst, Economic Solutions Ltd, Napier

⁴ Retirement Sector Housing Demand Forecasts 2016 – 2045, A Report for the Heretaunga Plains Urban Development Study Review (2016)

⁵ HPUDS phase 2-further research-summary (retirement sector)

⁶ 2014 Report on the Positive Aging Strategy, Ministry of Social Development

universal design principles to enable people to live safely and independently at home. These requirements are best met by new build housing developments.

- Developments should increase the opportunity for personal growth and community participation – access to local community facilities and recreation areas is encouraged
- The average size of existing retirement sector developments suitable to meet these needs is approx. 6 Ha. Sites of this size are only likely to be found on greenfield land in the Havelock North area.

2.2 Assessment of current greenfield sites for retirement sector development

The HPUDs draft strategic review indicates that ~40% of the greenfield lots in Havelock North are required for the retirement sector – yet none of the existing greenfield growth areas in the Village are suitable for retirement sector development.

Portions of the 'Reserve' greenfield growth areas are however, well suited to retirement sector development, but are obviously not available for development while in 'reserve status'. Specifically:

- 2.2.1 The immediate availability of land in the **Brookvale** area is currently impacted by the proximity to the mushroom farm and reverse sensitivity issues. While flat and of sufficient size, the land is not close to public transport or relevant social infrastructure. The available land has multiple owners (16) with an average lot size of 1.7 ha. 4 owners would need to collaborate to create a single parcel of land suitable for retirement development (>6ha) – likely inhibiting commercially viable retirement development.
- 2.2.2 The 'reserve' **Romanes** area is potentially impacted by the reverse sensitivity issues that impact **Brookvale**. The land is flat, but is not close to public transport or the necessary social infrastructure needed by the retirement sector. Comprising 6 parcels of land with an average lot of 3.9ha – at least 2 owners would need to partner to create the minimum viable size of 6+ha.
- 2.2.3 The new greenfield **Iona Road Triangle** area is not flat therefore not viable for retirement sector development due to the topography and contour of land. The greenfield area is also located some distance from public transport and social infrastructure.
- 2.2.4 The **Middle Road** (pt) 'reserve' area presents a range of excellent options for retirement sector development. The portion boarding Te Aute Road and Te Karamu stream is especially attractive for retirement development as outlined in 2.3 below.

2.3 Assessment of 162 Te Aute Road to meet retirement sector needs

The Site at 162 Te Aute Road, Havelock North⁷ (part of the Middle Road 'reserve' greenfield growth area) is ideally suited to the needs of the retirement sector. It provides land which will offer affordable housing options specifically designed to meet the needs of the 55+ year old segment and can fulfil 29% of the future market demand for retirement dwellings in Havelock North. Specifically:

- The Site is flat and within easy walking distance (< 800m) of the Havelock North CBD, social infrastructure and public transport – ideal for the retirement sector.
- The Site can easily integrate into existing reserve and community areas mitigating 'social isolation'.

⁷ See Figure 1

- The Site is a single parcel of flat land that can connect with existing HDC services. HDC evaluations of the Site indicate it is the most desirable of all the reserve and greenfield growth areas with modest infrastructure needs.⁸ Water and waste-water and road estimates are \$21,200 per dwelling. Estimates for the Romanes reserve greenfield area by contrast are \$99,500 per dwelling – 4.7 times more expensive.
- The typography, location and modest infrastructure assessment means the Site is ideal for building affordable, purpose built retirement housing with 20+ units per hectare. This will create more than 125 new dwellings specifically for the 55+ age group within 800m of the Havelock North village centre.
- In addition, the Site satisfies all 10 HPUDS criteria to be included as an additional greenfield growth area.⁹

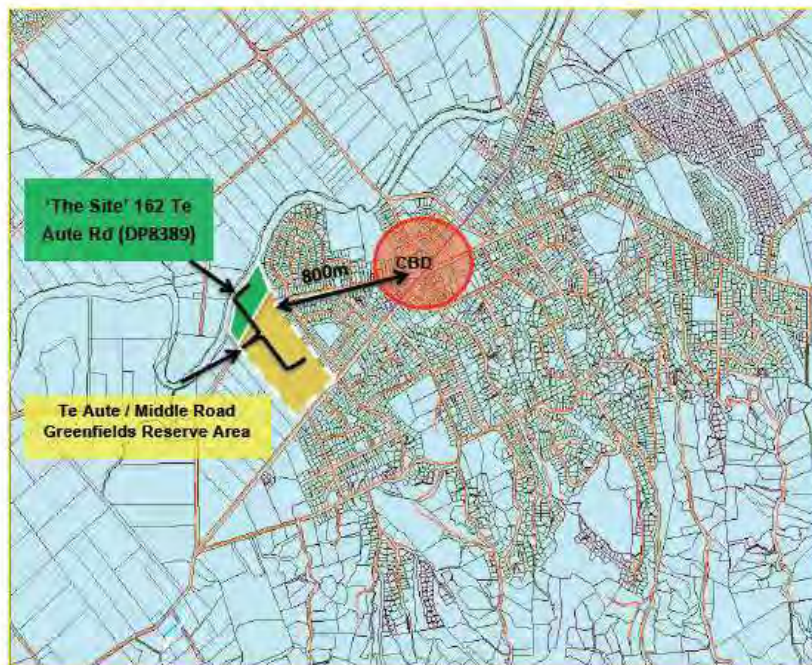


Figure 1: Te Aute/Middle Road proximity to Havelock North CBD

⁸ Hastings District Council Planning and Regulatory Committee Meeting, Assessment of Possible Residential Greenfields Alternative Sites, 18 February 2016.

⁹ Heretaunga Plains Urban Development Strategy (July 2016 draft), Ref 3.2.1 page 25. The Te Aute Holdings Rezoning Request, Submission to the District Plan Hearings Committee 13th March 2015

3 Proposal to vary HPUDS to include retirement special interest areas

This submission seeks an amendment to HPUDS to rezone the Site specifically for the retirement sector as a special interest area.

162 Te Aute Road, Havelock North (DP8389 – being 6.1 hectares) should be rezoned as ‘a special retirement area’ for the purpose of meeting the requirements of HPUDS and the HDC to ensure the adequate supply retirement land and dwelling units.

The reasons why the Site should be rezoned and regarded as fit for retirement sector development are outlined below:

- The Site has been identified as a reserve area for greenfield development in Havelock North in the HPUDS review – meaning its location has been assessed as suitable for future development. When compared with all greenfield growth areas (including reserve) in Havelock North, it is substantially the best in terms of retirement sector development.
- The Site is ideally suited to meet the needs of the retirement sector being flat, within flat walking distance of the CBD (<800m), social infrastructure (shops, banks, post office, medical, community facilities) and affordable public transport.
- The Site will conservatively support a unit title subdivision allowing for a minimum of 20 units per ha (125+ units) and meets 29% of the market demand for retirement greenfield housing in Havelock North over the next 30 years. If rezoned, it would represent 12% of the projected additional greenfield dwellings required in Havelock North to 2045.
- The site has excellent road frontage and can easily integrate into existing services. Existing service agreements¹⁰ with HDC in relation to water, traffic, wastewater and storm-water could be leveraged. New infrastructure requirements are assessed as very modest.
- Low impact urban designs have been completed for the Site and can easily connect to existing Hawke's Bay Regional Council wetland planting and storm water ponds – mitigating storm water and flood risks¹¹.
- The site is adjacent and connects to the Te Karamu projects and links established walkways and bridges to Anderson Park. TAH will grant access through the Site to Te Karamu walkways, waterways and cycle ways meeting local community and Regional Council requests for additional public access to the area¹².
- The Site is the only possible new greenfield area in a single parcel of land of sufficient size (6+ha) to suit retirement sector development. It also supports compact urban form by squaring off the Havelock North boundary, rather than extending it.
- Local iwi have provided a letter of approval for this area to be developed.
- The site poses no sea level of coastal erosion issues and there are no known active-fault lines in the area.
- The Site's liquefaction rating can be mitigated with suitable foundation engineering design¹³.
- A covenant would be established on each of the lots limiting the permanent occupants of any dwelling on the Site to those over the age of 55 years.

¹⁰ Reference: Te Aute Holdings 2008 private plan change 40 application

¹¹ Reference: Te Aute Holdings Rezoning Request 2015, Appendix 7a & 7b, page 63

¹² Reference: Te Aute Holdings Rezoning Request 2015, Appendix 11, pages 87-88

¹³ Reference the RDCL geotechnical report

It is submitted that the Site is ideally suited for development for the retirement sector. The location, typography and easy access, enable the construction of affordable, safe housing that elegantly integrates into existing community amenities.

We submit that the significant demand for greenfield land for retirement development in Havelock North can be supported by including the portion A of the Middle Road area as a special interest retirement area suitable for greenfield residential development for the 55+ age group.

The Site should be immediately released from its 'reserve status' and rezoned as a greenfield development area for the retirement sector.

A successful submission will enable TAH to partner with HDC to leverage existing planning artefacts¹⁴ and resources to fast track a special interest retirement area. This will mitigate the extensive market demand for purpose built retirement units and avoid the delays inherent in typical subdivision planning requests.

4 How rezoning could work for the Middle Road greenfield area

This request is to extend the residential zone over section 'A' of the Middle Road greenfield reserve area, for retirement (55+) land and dwellings to be included in the Hastings greenfield growth areas as a special retirement area. The legal description of section 'A' is 162 Te Aute Road, Havelock North (DPR389 – being 6.1 hectares).

The remaining portion of the Middle Road area could remain "reserve" for future residential greenfield development or be rezoned for the retirement sector at a later date according to market demand.

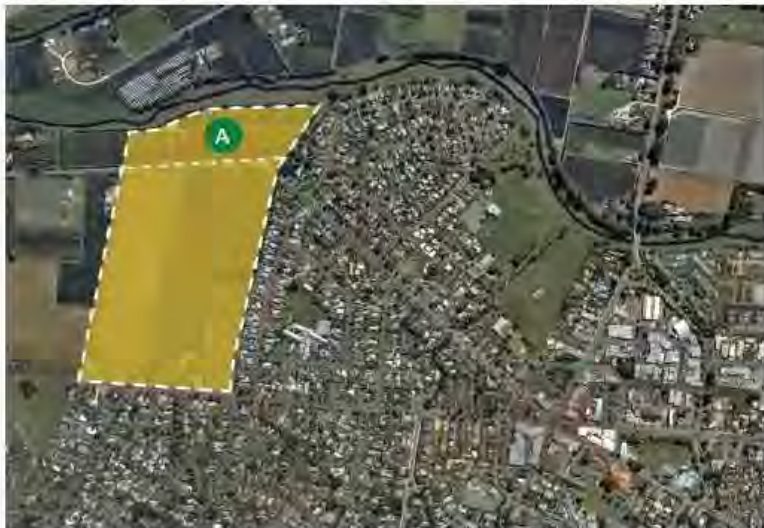


Figure 2: The Site, 162 Te Aute Road ('Section A')

¹⁴ Te Aute Holdings 2008 Private Plan Change 40, Te Aute Holdings Rezoning Request 2015 and other relevant HDC documents

5 Reference Documents

The reference material below are either HDC and Government documents or have been previously provided by Te Aute Holdings Limited to the HDC for various planning purposes and can be resubmitted if required.

1. Original Private Plan Change 40

We have previously provided Council with the following reports:

- o Engineering reports for both waste and storm water with Contracts with HDC approval.
- o Reports confirming the site can achieve hydraulic neutrality concerning storm water.
- o Geotechnical, flooding and liquefaction reports.
- o Pesticide and Chemical soil residue reports.
- o Traffic reports.
- o Two landscape reports that include Low Impact Urban Design, Urban Design Protocol and Community protection through Environmental Design.
- o Concept Plans to show linkages and recreational access areas to the Karamu Stream and the Te Karamu project.
- o The Concept plans demonstrate the possibility of intensification of housing and the provision of low to higher cost sites – depending on location in respect to the river outlook.
- o Four reports on the versatile soil issue. All scientifically concluded that excavation removed Type 1 and 2 soils to the extent that the land has been declared non-viable for commercial crop production and is no longer versatile. Council commissioned a peer review and concluded the land has compromised productive capacity and is a poor site relative to other areas of the plains.
- o Letters of approval from local tangata whenua, Department of Conservation and Archaeological Association.
- o Letter of approval from the Regional Council and with LIUD no need for consent to discharge.
- o Letter from Unison re Power supply and underground power services.
- o A structure Plan has been developed with performance standards to be used to implement LIUD methodologies – resulting in the integrated design of roading, storm water infrastructure, reserves, pedestrian linkages and providing direct access for new recreation opportunities. (M B and J A Smith: Submission to the draft Heretaunga Plains Urban Development Strategy, 15th June 2010)

2. The Site Holding Rezoning Request: Submission to HD Plan Committee 13th March 2015

3. Hawkes Bay Today – Strong Population Growth Needs to Be Managed, April 26 2016

4. National Policy Statement on Housing on Urban development Capacity

5. Retirement Sector Housing Demand Forecasting 2016 (Environmental Management Services) for the HPUDS Review

6. HPUDS Review Draft

7. The Te Aute Holdings Rezoning Request to the District Plan Hearings Committee 13th March 2015 (The Site Holdings Rezoning Request + Appendices)

8. Foundation Conditions B. H. Williams, RDCL Geotechnical Assessment; Design documentation for Crosses Road Subdivision

9. Appendices: Report Megan Caffranry to the Planning and Regulatory Committee 17/11/15

10. 2014 Report on the Positive Ageing Strategy, Office for Senior Citizens, Ministry of Social Development

43 Stevenson Family

Name *	Stevenson Family (by Matthew Lawson)
Email *	[REDACTED]
Phone Number *	[REDACTED]
Address	PO Box [REDACTED] Napier 4182
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes

Q1: Are these the big issues that the Reviewed Strategy needs to tackle?

This submission is made on behalf of Paul Stevenson, Havelock North and the Stevenson Family.

The sustainable supply of residential, Industrial and rural residential development land is a cornerstone of good Planning Practice. Maintaining that supply so that the region and the property market do not become constrained is one of the big issues that the strategy needs to tackle.

The strategy also needs to have regard to the need to service development in the most efficient and cost effective manner. Some of the growth areas will be difficult and expensive to service meaning that release of development onto the market may be delayed or not occur as anticipated. The Strategy needs to maintain a variety of development options.

Some of the Land in the vicinity of Romanes Drive has been identified as a "Reserve" Growth area. This area should be expanded through to Thompson Road as delineated in the current Appeal to the Environment Court by Michael Bourke and should be identified as a residential Growth area suitable for immediate development. The current appeal to the Environment Court provides an efficient means of providing a supply of sections to the market to remedy the unsatisfactory limited supply that currently exists.

Q2: Do you think our projections of development demand and capacity are correct?

No. We believe that demand for Residential development in the Havelock North area is underestimated as is the immediate demand for that development.

The process by which development areas are to be included in District Planning documents needs to be streamlined. The current process is cumbersome and time consuming and does not allow any of the Councils to react in a timely manner to market demands or changes.

The rezoning of the submitters land via the current appeal process will assist in providing an immediate supply to the market.

Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10-30 years?

Yes. It is assumed that priority areas for development will automatically give rise to the resultant land being rezoned and being available to the market. This leads to the potential manipulation of the market by control of supply. The strategy should provide multiple choices and Councils should actively seek to rezone areas to be rezoned to avoid any party or parties being able to manipulate the market.

Q4: Do you support any particular parts of the draft revised Strategy?

We support the identification of the land on Romanes Drive and expanded through to Thompson Road as an area suitable for Residential Growth. We do not support the deferral of that suitability by making this area a "reserve area".

This land is readily serviced, meets all RPS criteria and provides a logical extension to existing development. In this regard we disagree with the suggestion that this land is not contiguous with other urban areas. It is immediately adjacent to existing development in Havelock North and contiguous with the Brookvale land identified as a residential growth area by HPUDs.

Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?

As above

Any other comments that submitters wishes to make or suggested amendments:

The process by which development areas are to be included in District Planning documents needs to be streamlined. The current process is cumbersome and time consuming and does not allow any of the Councils to react in a timely manner to market demands or changes.

44 Scott Taylor

Name *	Scott Taylor
Email *	
Phone Number *	
Address	Raven Grove, Havelock North
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	No
Q1: Are these the big issues that the Reviewed Strategy needs to tackle?	absolutely – show me a section in havelock for sale under \$250K ?
Q2: Do you think our projections of development demand and capacity are correct?	no
Q4: Do you support any particular parts of the draft revised Strategy?	request the Brookvale Road option be 'included and rezoned for development now' We are desperate !!!!!

45 Te Taiwhenua o Heretaunga

Name *	Te Taiwhenua o Heretaunga (by Marei Apatu)
Email *	
Phone Number *	
Address	Te Taiwhenua o Heretaunga P.O. Box 718 Hastings 821 Orchard Rd Camberley Hastings.
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes

Q1: Are these the big issues that the Reviewed Strategy needs to tackle?

No;

The strategy should have gone much further to look into safe land use, what industries in 30 years time will sustain our communities and protect our environment? i.e.

A water utility network that is safe highlighted by the projected increase in housing development across the plains, this is just following the recent E coli water contamination to the 'high risk' in particular where communities are on the fringes of the Aquifer? the water system was at fault, if this cannot be identified or remedied quickly a wider population will be affected

Crisis management and business continuity plans review is updated for the HDC, in conjunction with the HBRC, HBDHB, MoH for events i.e.

Flooding

Water contamination

Water intrusion

Climate change

Volcanic fallout

others

What has revealed itself is the nature and extent of response time? therefore the importance to manage the process effectively.

Q2: Do you think our projections of development demand and capacity are correct?

As the spread of development on to the plains productive fertile lands is simply adding further overlap into these unique spaces, therefore it looks as though real long term visioning is a tac on process? so I dont agree full consideration of issues for the HPUDS strategy has clearly articulated.

The economic model with both central and local government sets agriculture and horticulture sectors needs ahead of everyone else, in turn will become the key 'driver' to put at risk environmental considerations in the case of over water allocation. Agriculture in particular animal cows and sheep will seriously further degradate our rivers and aquifer

The starting point should be a higher standard for all drinking water quality rather than flipping over to accept a lower level due to contamination buildup and 'lag effect' which is starting to reveal itself

Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?

the above items

Yes The projected density of urban development sprawl over our taonga the Heretaunga Aquifer (1880

ha). Has there been consideration to ascertain industry as well land uptake for housing / built up areas urbanisation / infrastructure over Aquifers? Sink holes as the result of dried out aquifers through over resource demand is becoming to familiar? The 1000% over allocation to the Karamu awa is a case in point and the legacy is becoming apparent

Yes – Stormwater

Discharge outlets into the Karamu stream be stopped and diverted away from the awa over the next 30 years under the HPUDS process

Q4: Do you support any particular parts of the draft revised Strategy?

Yes some of the parts in particular to Papakainga Policy is a credit to the HDC. Enabling the process through good open community participation to work toward the mana whenua aspirations within the HPUDS process. More meaningful dialogue can produce a winning result

Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?

Marae reservations and facilities
Be supported in the same way as what is provided for with HDC community halls, ie maintenance and insurance cover? The Settlement claims are making provision for marae to work toward considerable upgrade of their facilities for the benefit of the wider community as a whole. Marae who are using there own settlement monies should be on the basis of dollar for dollar. These are unique cultural bastions and need supporting as a place of destination, to uphold culture and drive whanau strength based processes for the young and old

Any other comments that submitters wishes to make or suggested amendments:

Treaty Settlement
As this process is still working toward a full and final Settlement (2017) the realization that a future body of mana whenua as decisions makers is eminent, marae hapu Iwi and the post settlement governance entity will be recognised through clear representation of authority and mandate, this process be designed by the mana whenua.

46 Token Holdings

19th August 2016

HPUDS Review
HB Regional Council
Private Bag 6006
Napier 4142

RECEIVED	
RECEPTION	
TIME: 1:30pm	DATE: 22/8/16
SIGNATURE: <i>KJ</i>	



Draft HPUDS Revised Strategy 2016 – Submission of Token Holdings

Thank you for the opportunity to submit on the *Heretaunga Plains Urban Development Strategy* (HPUDS) review. This submission is on Behalf of *Token Holdings* and relates to their land and surrounding properties which are currently identified in the *Tomoana Industrial Indicative Node (MAP 18)* under the reviewed HPUDS.

Overall we support the intent of the HPUDS however have some concerns regarding the open and indicative nature of Map 18 and recommend that this should be more clearly defined.

Background

The expansion of the Tomoana Industrial area has been identified in a number of previous council strategies including Hastings District Councils Industrial Expansion Strategy in 2002 and revised Strategy in 2009. The following is the Hastings District Council 2009 Expansion Map for the Tomoana Area¹:



Figure 1 - 2009 Industrial Strategy Map

More recently the expansion of the Tomoana Industrial was identified in the original version of the HPUDS (2010) as an 'Indicative node' under Map 19. It is this map which has been again included in the current version of HPUDS under review.

¹ <http://www.hastingsdc.govt.nz/industrial-strategy>

In 2012 Private Plan Change 56 was accepted by the Hastings District Council to rezone a large area of Tōmoana for food related industry. This area of industrial land this area is shown below:

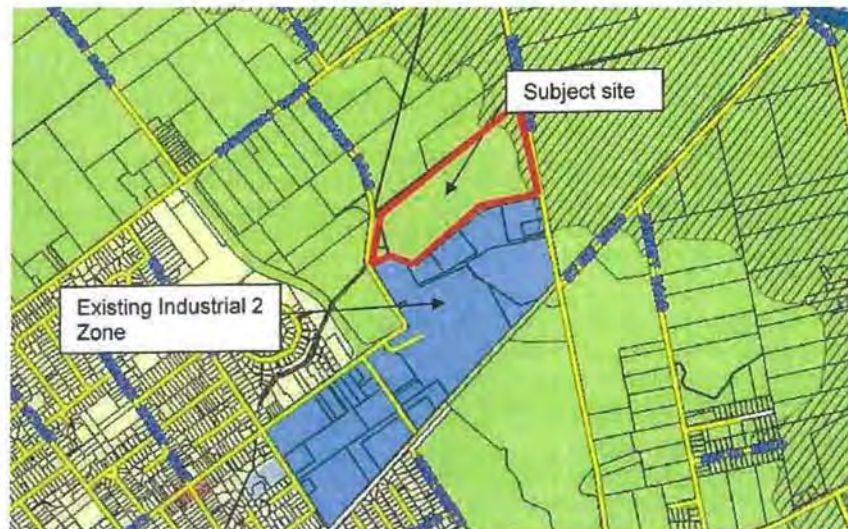


Figure 2 - Area Rezoned Industrial under Plan Change 56

This land has been steadily developed over the past three years and as a result under the Hastings District Plan Review *Stage 2* of this zone has been released. This is the last area of industrial zoned land available in the Tōmoana area.

Amendment to Growth Area Map (Map18)

As part of the HPUDS Review the *Tōmoana Industrial Node* (indicative) is proposed to remain and is shown below in Figure 3²:

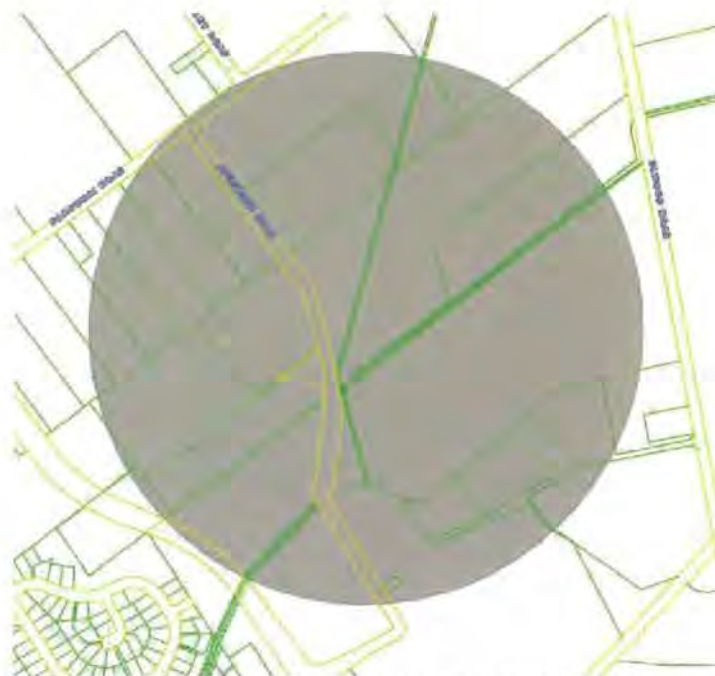


Figure 3 - Indicative Tōmoana Industrial node (Map 18)

² Map 18 – Tōmoana Industrial Node is included in the attached appendix documents

The indicative node is a blunt planning tool and does not provide any certainty for land owners or provide the direction required for council to be concise in its plan change processes. The node as shown occupies a large area of industrial land and does not follow existing features (primarily roads) which previous strategies have followed.

Therefore, it is our submission that the *inductive node* be removed from HPUDS and replaced with a more defined expansion area, following existing roads and the bordering industrial zone. Within the proposed extension is submitted that the land detailed in *Figure 4* below should be included³:



Figure 4 - Proposed Tomoana Industrial Growth Area

The plan above shows a more defined area considered appropriate in achieving the growth of the Tomoana industrial area. The area is consistent with previous industrial strategies and will provide for the industrial expansion of the Tomoana Industrial area for the life of HPUDS⁴.

This specific area is also considered appropriate for inclusion in HPUDS for the following reasons:

- The proposed extension (oppose to the node) is well defined by physical features, being existing roads and the proposed *North Eastern Connector Road* (remains under consideration as part of the medium to long term transportation strategy⁵)
- The proposed growth boundary does not directly adjoin any residential zone, and the opposite Northwood subdivision requires a specific acoustic fence the length of the boundary to mitigate noise effects.

³ The Proposed *Tomoana Industrial Extension Map* is included the attached appendix documents

⁴ HPUDS is intended to provide sufficient land for development out to 2045

⁵ <https://www.hastingsdc.govt.nz/resourceconsents/nar>

- The sites have existing access to sewer and stormwater services (see attached utilities plan)
- Council have provided for 'profile' and 'dry' type industries with Irongate area and Omaha Road north, however this area can provide for a wider range of industries (potentially dry and wet industries) and also industries that support the agricultural and horticultural industries while being close to the employee supply (Hastings).
- There is no recognised cultural, historical or archeologically sites and the area is not recognised as a significant landscape under District Planning Maps.
- The area either avoids natural hazards found elsewhere in the region, or the development of the site can mitigate such hazards that are identified in the Civil Defence Hawkes Bay Hazards Maps⁶, in particular:
 - The area is not located over any recognised fault line
 - The site is not located in the Tsunami inundation area (Appendix 58 of the Hastings District Plan⁷).
 - There is a *moderate risk* of liquefaction however this hazard can be designed for in regard to building foundations and this is the case on all sites located on the Hereatanga Plains (especially in Napier).
 - The northern most corner of the extension area (corner Elwood and Pakowhai Road) has been identified as being at risk of flooding (50 year ARI). However as was the case with the industrial rezoning under *Plan Change 56* – these issues can be resolved through the plan change process with a stormwater retention/storage area to mitigate this hazard. Along with minimum floor levels for development it is considered that this hazard can be avoided, however further investigation would be required as part of the future Plan Change.

Being a high level strategy the specific timing and infrastructure upgrades would be considered as part of the District Council or Private Plan Change for the area.

Summary

This submission recommended that the 'indicative node' identified in HPUDS is changed to clearer urban boundary which follows the existing and proposed physical features, being the road boundaries of the proposed North Eastern Connector Road, Pakowhai Road, Elwood Road and the exiting industrial zone.

This is a logical definition of what is currently proposed as an 'indicative node' and provides more certainty around the proposed urban boundaries. This is also the approach with a number of the other industrial expansion areas.

Overall we agree with HPUDS that this area is suitable for new industrial development however consider that the planning maps regarding this industrial extension can be clarified as proposed.

We would like the option of being able to present a verbal submission at the Working Group's meeting (date to be confirmed in week commencing 12th September).

⁶ Refer to the attached *Hawkes Bay Natural Hazard Property Report*

⁷ Refer to attached *Tsunami Inundation Area*



Jason Tickner
Senior Planner
Development Nours Ltd

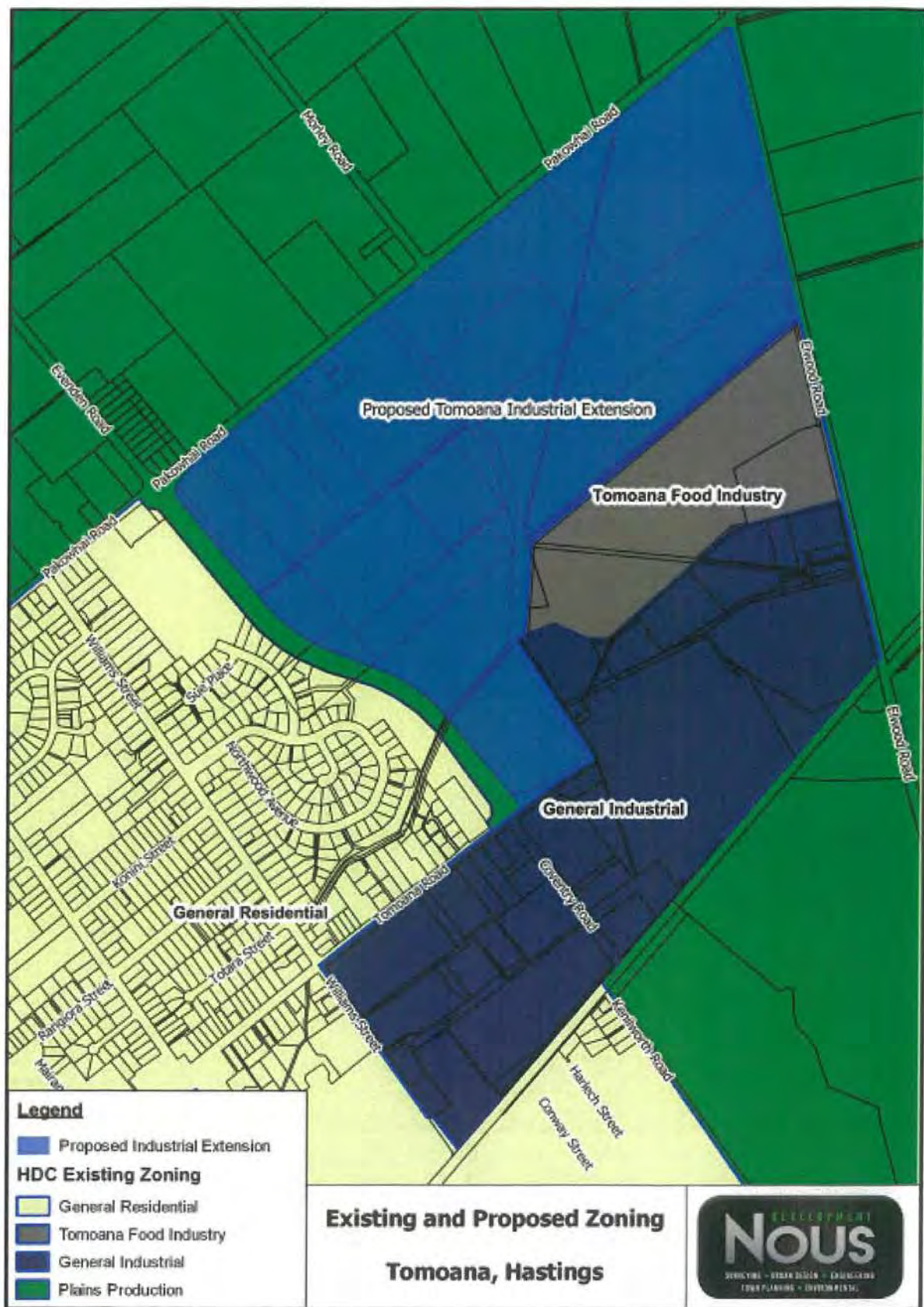
Submitters details:	Token Holdings PO Box 877 Hastings 4156
Address for service of applicant:	Development Nours Ltd PO Box 385 Hastings 4156
Telephone:	06 876 2159 022 043 3541
Email:	jason.tickner@developmentnours.nz
Contact person:	Jason Tickner

Appendix Documents

- HPUDS Review: Map 18 – Tomoana Industrial Node (Indicative only)
- Proposed Map 18 – Tomoana Industrial Extension
- HDC Plans
 - Aerial Photo
 - District Plan Zoning
 - Utilities
- Hawkes Bay Natural Hazard Property Report
- Hastings District Plan Appendix 56 – Tsunami Inundation Areas



Proposed Map 18 – Tomoana Industrial Extension



K:_2016\H20160093 Bishop\GIS\Existing Zoning.apx

2016-06-16T12:51:46



DISCLAIMER: The program, Public Access Control, requires that the data posted on the map is 100% accurate.

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This map document contains data sourced from the New Zealand Archaeological Association (NZAA) Archaeological Site



Tomoana Extension - Zoning Map

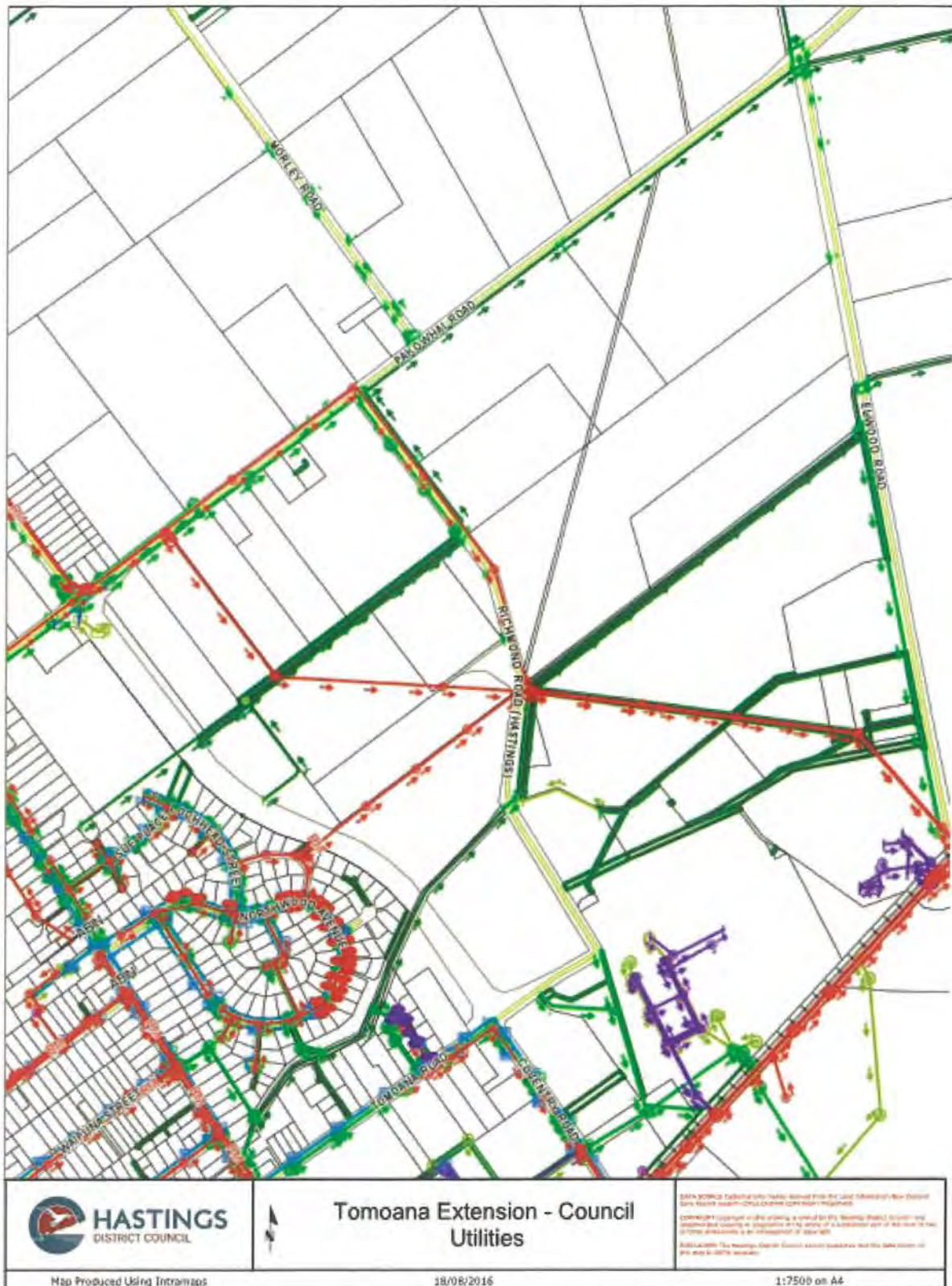
©2016 Hastings District Council. All rights reserved. This map is a reproduction of the original map and is not to be used for any other purpose without the written consent of Hastings District Council. The map is a reproduction of the original map and is not to be used for any other purpose without the written consent of Hastings District Council.

Map Produced Using Inframaps

18/08/2016

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HDC Plan – Council Utilities



HBRC Natural Hazard Report

	HAWKE'S BAY NATURAL HAZARD PROPERTY REPORT	Friday, 18 August 2016
<small>CROWN COPYRIGHT RESERVED © Copyright Hawke's Bay Regional Council</small>		

**41 Richmond Road, Temoana
Hastings District
Part Lot 1 DP 3424
0963037200**

This report summarises the known hazards intersecting this property, based on research commissioned to assess regional risk – these research reports are summarised below. The hazard assessment methodologies, information compilation and presentation techniques used for these assessments include certain qualifications and limitations on the use, noting:

- The hazard information provided is based on the best information available at the time of the studies and was supplied under specific contract arrangements including financial and time constraints.
- The hazard information may be liable to change or review if new information is made available.
- Councils and other organisations may hold more detailed hazard information than provided here. This Natural Hazard Property Report is not a substitute for a Land Information Memorandum (LIM).
- The precision and accuracy of the data varies, therefore it is important that you obtain expert advice to help to interpret the information.

The hazard maps in this report are based on the following referenced research reports. Online Natural Hazards Resource Database contains a register of the hazard documents, research material, and publications from either the Council or external organisations and this database may contain other pertinent information related to this area:
The referenced reports are:

- Earthquake Fault lines**
 - Earthquake hazards in Hawke's Bay Initial assessment
 - Earthquake hazard analysis - Stage 1. Recurrence of large earthquakes determined from geological and seismological studies in the Hawke's Bay area
 - Hawke's Bay region earthquake hazard analysis programme, Stage 2 - a numerical assessment of the earthquake hazard in the Hawke's Bay region
 - Active Fault Mapping and Fault Avoidance Zones for Central Hawke's Bay District: 2013 Update
 - Active Fault Mapping and Fault Avoidance Zones for Hastings District and environs
 - Fault Avoidance Zone Mapping for Wairoa District, Napier City and surrounds
- Earthquake Liquefaction**
 - Stage II - Earthquake Analysis: Part II - Evaluation of liquefaction potential in the Hawke's Bay Region
- Earthquake Amplification**
 - Hawke's Bay Regional Council earthquake hazard analysis program, Stage III : evaluation of ground shaking amplification potential Volume 1
 - Hawke's Bay Regional Council earthquake hazard analysis program, Stage III : evaluation of ground shaking amplification potential Volume 2: Appendices
- Quaternary Geology**
 - Hawke's Bay Regional Council earthquake hazard analysis program, Stage III : evaluation of ground shaking amplification potential Volume 2: Appendices
- Tsunami Inundation Extents**
 - Hawke's Bay Tsunami Inundation by Attenuation Rule
 - Review of Tsunami Hazard in New Zealand
- Flooding Extents**
 - Wairoa River Flood Hazard Study
 - TeNgaru Catchment Flood Hazard Study
 - Walpatiki Catchment Flood Hazard Analysis
 - Kopuawhara Opoulama Flood Hazard Analysis

	<p align="center">HAWKE'S BAY NATURAL HAZARD PROPERTY REPORT</p> <p align="center"><small>CROWN COPYRIGHT RESERVED © Copyright Hawke's Bay Regional Council</small></p>	<p align="right"><small>Friday, 18 August 2016</small></p>
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(vii) Coastal Hazard

- Regional Coastal Environmental Plan
- Clifton to Tangoio Coastal Hazards Strategy 2120 - Coastal Hazard Assessment
- Clifton to Tangoio Coastal Hazards Strategy 2120 - Coastal Risk Assessment
- Other Coastal Hazard Reports
- Cliff Hazard Zone Delineation

(viii) Wairoa River Bank Stability Zones

- Wairoa River Bank Stability Assessment

Online Mapping Conditions of Use

1. Use of these maps is subject to these disclaimers and exclusions. By using these maps the user is signifying his or her agreement to be bound by these exclusions and disclaimers.
2. Hawke's Bay Regional Council's Hazard maps have been compiled using the best information available to the council. The maps indicate the extent of the hazard from analysis of information only. They do not necessarily reflect the greatest extent of the hazard suffered in the past, or likely to be suffered in the future.
3. The hazard information provided does not imply any actual level of damage to any particular structure, utility service or other infrastructure.
4. These maps should not be relied upon as the sole basis for making any decision in relation to potential risk.
5. The hazard information provided is regional in scope and cannot be substituted for a site-specific investigation. A suitably qualified and experienced practitioner should be engaged if a site specific investigation is required.
6. Hawke's Bay Regional Council makes no representations, warranties or undertakings about any of the information in these maps and/or electronic files including, without limitation, their accuracy, completeness, quality or fitness for any particular purpose.
7. The Hawke's Bay Regional Council shall not be liable for any loss or damage arising out of, or in connection with, the use of the information contained in these maps and/or electronic files.
8. Hawke's Bay Regional Council reserves the right to change the content and/or presentation of any of the information contained in these maps at its sole discretion, including these notes and disclaimer.
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	<p>Natural Hazards Report</p> <p>The information displayed is schematic only and serves as a guide. It has been compiled from Hawke's Bay Regional Council records and is made available in good faith but its accuracy or completeness is not guaranteed. Cadastral information has been derived from Land Information New Zealand's (LINZ) Core Record System Database (CRS).</p> <p>CROWN COPYRIGHT RESERVED © Copyright Hawke's Bay Regional Council</p>	<p>Friday, 18 August 2016</p>
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Liquefaction

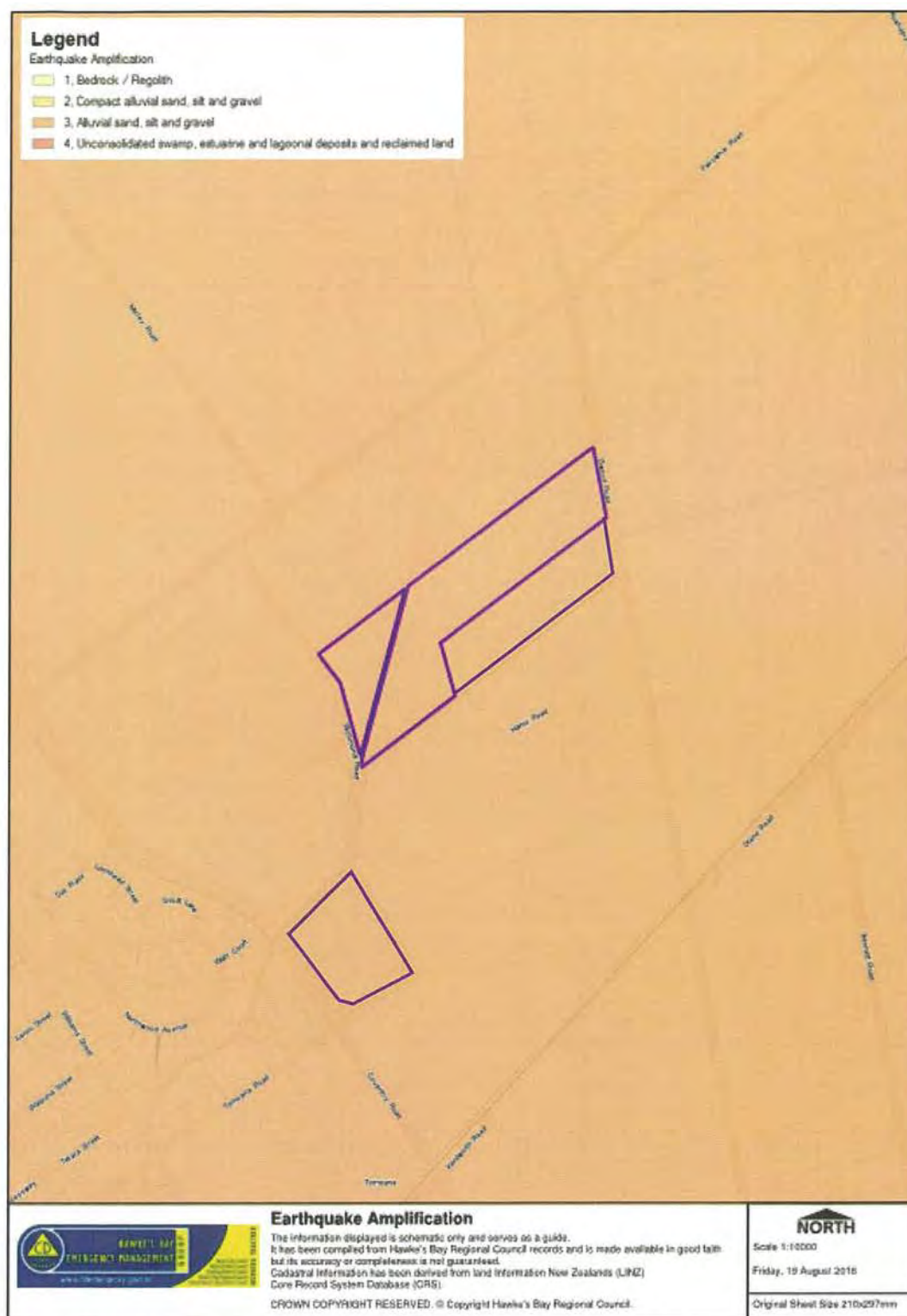
Liquefaction occurs when waterlogged sediments are agitated by an earthquake. Buildings can sink and underground pipes may rise to the surface. When the shaking stops, groundwater is squeezed out of the ground causing flooding, which can leave areas covered in mud. Hawke's Bay has several areas with sediment of high liquefaction susceptibility and numerous earthquake sources capable of generating an earthquake large enough to cause liquefaction, and there were numerous reports of liquefaction following the 1931 earthquake.

Low-lying areas in the region, especially those near the coast, and reclaimed land are particularly susceptible. Liquefaction susceptibility maps for Hawke's Bay and Napier/Hastings completed by GNS Science in 1996.

Based on a national seismic model shown above, scientists have estimated Hawke's Bay might experience the following shaking intensities for different return periods in the future. Our risks include earthquake prone buildings which have been identified within our main cities & towns, and although residential dwellings are considered a low risk, damage may be widespread requiring re-housing. Infrastructure networks are also at risk and there are also risks to our future social and economic wellbeing. The Hawke's Bay CDEM is the lead agency for managing any natural hazard event, like a large earthquake that badly affects the people of Hawke's Bay.



Return periods for different earthquake shaking intensities in Hawke's Bay		
Modified Mercalli Intensity Scale	Description	Return Period
MMVI	Felt by everybody. Difficulty walking. Objects tend to fall from shelves. Slight damage to poorly constructed buildings.	6
MMVII	Difficulty standing, furniture movement. Noticed by drivers of cars. Tiles, water tanks, walls and some buildings damaged.	25
MMVIII	Steering of cars affected. Buildings damaged including some damage to earthquake resistant buildings. Cracks in ground.	100



	<p>Natural Hazards Report</p> <p>The information displayed is schematic only and serves as a guide. It has been compiled from Hawke's Bay Regional Council records and is made available in good faith, but its accuracy or completeness is not guaranteed. Cadastral information has been derived from Land Information New Zealand (LINZ) Core Record System Database (CRSD).</p> <p>CROWN COPYRIGHT RESERVED. © Copyright Hawke's Bay Regional Council</p>	<p>Friday, 10 August 2016</p>
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Amplification Report

Most of the damage during an earthquake is caused by ground shaking. The amplification map indicating the regional hazard from ground shaking in Hawke's Bay.

Seismic waves, travelling through the earth at different speeds and amplitudes because of a fault rupture, cause the ground to vibrate and shake in an earthquake. The intensity of the shaking is measured on the Modified Mercalli (MM) scale of 1 to 12, although MM10 is the maximum ever observed in New Zealand. The intensity of ground shaking at any location is affected by the magnitude of the earthquake, proximity to the source of the earthquake, and the geological material underneath that location. Larger earthquakes generally produce greater shaking and shaking is usually more pronounced nearer the source of the earthquake. Deep earthquakes generally produce less shaking because the source is deep in the earth. Fault ruptures often start at one point and propagate along the fault, rather than breaking the whole fault at once. In that case, shaking may be more intense at locations towards which the rupture is propagating, and less intense at locations in the opposite direction, that is, in the direction from which rupture is propagating. The damage caused by shaking depends on how large the ground motion is, how long it lasts, and its frequency. Large motions put great stresses on structures that sit on or in the moving ground and the longer the shaking lasts, the more likely the structures are to sustain serious or permanent damage.

Different frequencies of shaking affect buildings differently - in general, low frequency motions affect taller buildings more, while high frequencies affect shorter buildings. The type of material underlying the site can have a great effect on the nature and intensity of the shaking. Sites underlain by hard, stiff material such as bedrock or old compacted sediments usually experience much less shaking than sites located on young, loosely consolidated sediment, which tends to amplify shaking.

Closed basins filled with soft sediment overlying bedrock, such as the Poukawa basin, are especially vulnerable to amplification of shaking, as earthquake waves can become trapped within the basin, travelling back and forth increasing the shaking rather than being dissipated. Water-saturated sites, such as river banks and lagoons, are particularly susceptible to shaking-induced ground damage such as liquefaction.

WHAT CAN YOU DO?

Most people in Hawke's Bay will survive a large earthquake with some loss, but some people will be severely affected. Action you take now can help reduce damage to your home and business and help you survive. Practice Drop, Cover and Hold





	Natural Hazards Report The information displayed is schematic only and serves as a guide. It has been compiled from Hawke's Bay Regional Council records and is made available in good faith but its accuracy or completeness is not guaranteed. Coded data information has been derived from land information New Zealand's (LINZ) Core Record System Database (CRS) CROWN COPYRIGHT RESERVED. © Copyright Hawke's Bay Regional Council	Friday, 10 August 2018
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Flooding Report

Information provided on the flooding maps shows general details about flooding patterns and areas at risk. They have been produced using computer models using verification with actual events where possible. Flood extents shown in the maps are not meant to show specific flooding details on each property.

These maps should not be relied upon as the sole basis for making any decision in relation to potential flood risk. Contact the Hawke's Bay Regional Council Engineering Department if further information is required with regards to a specific property.

Urban pipe networks and flooding on the street network in the urban areas have not been considered in the flood modelling. Urban areas show flood risk areas that are the result of the capacity of open drains being exceeded.

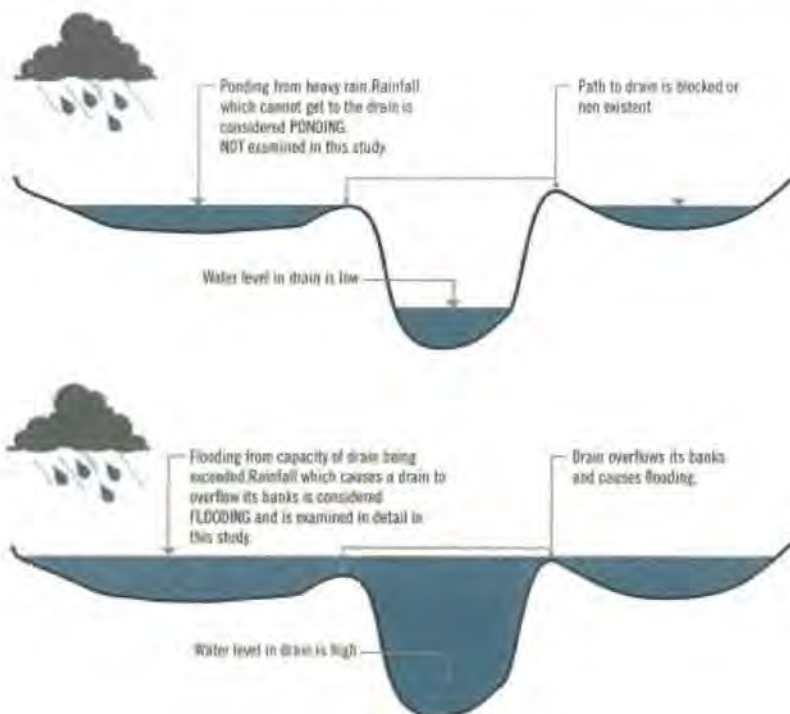
In some flood risk areas, houses and other structures may be elevated above the ground, and would be considered not floodable. These cases are not identified in this flood modelling.

Flood modelling is based on 100 year return period events (1% annual exceedance probability) for river flood risk areas, and 50 year return period events (2% annual exceedance probability) for floodplain flood risk areas.

The effects of climate change have not been included in this flood modelling

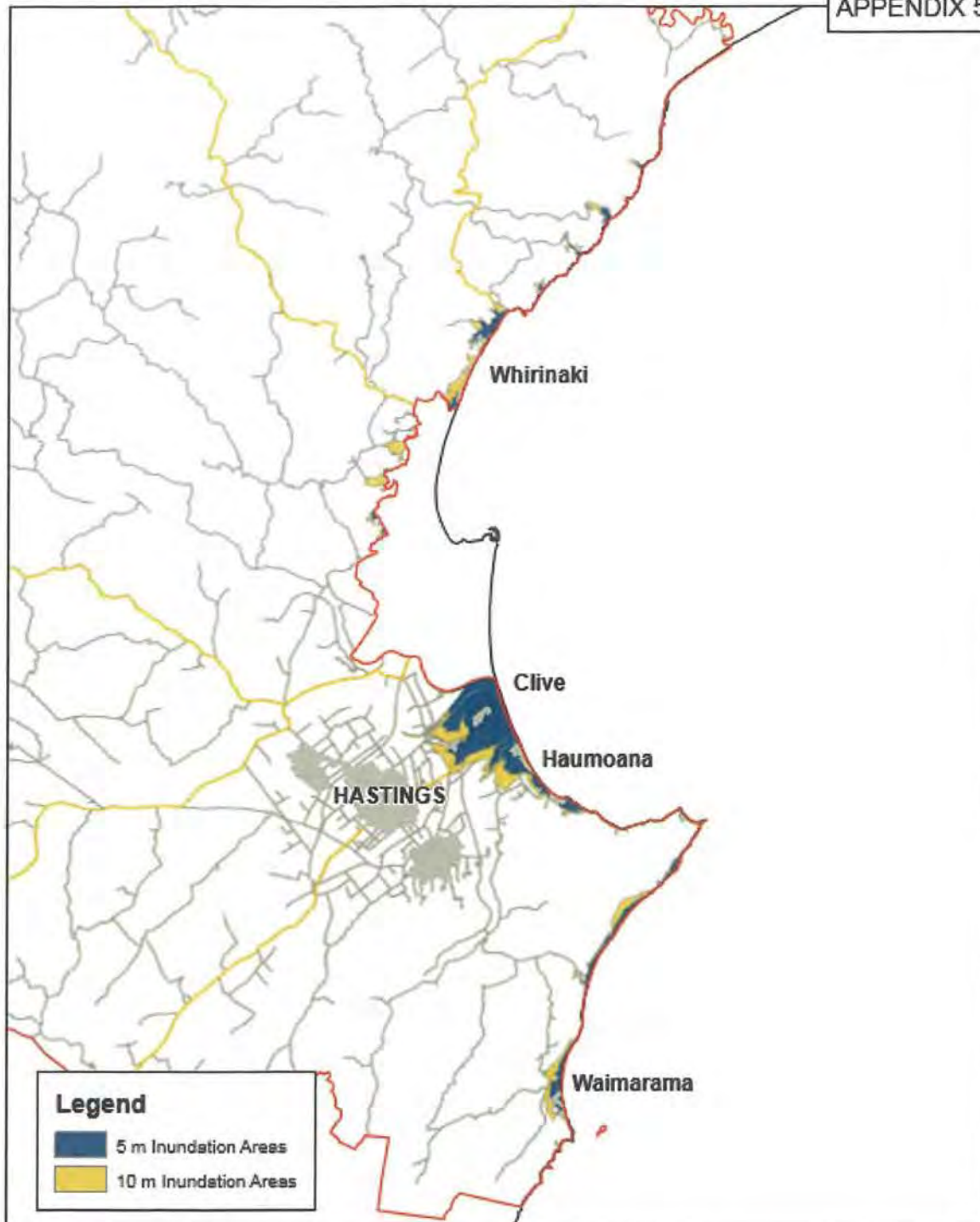
Flooding vs. Ponding

Major flooding happens when the capacity of a stream or drain is exceeded. Small scale, localised ponding may occur in areas where water cannot get to the stream through the normal paths of overland flow when the streams are not in flood. The flood hazard study does not consider this type of localised ponding in detail.



Hastings District Plan Appendix 58 – Tsunami Inundation Areas

APPENDIX 58



Tsunami Inundation Areas



Map Produced using ArcMap

Version: Council Decisions on Submissions

Date: 12 September 2015

Scale: 1:350,000

DATA SOURCE: Elevation information derived from the Land Information New Zealand's Core Record System (CRS).
CROWN COPYRIGHT RESERVED

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DISCLAIMER: The Hastings District Council services guarantee that the data obtained from third party companies and shown on this map is 100% accurate.

47 Jason Troup

Name	Jason Troup
Email	[REDACTED]
Phone Number	[REDACTED]
Address	PO BOX [REDACTED], Hastings
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes
Q1: Are these the big issues that the Reviewed Strategy needs to tackle?	Yes
Q2: Do you think our projections of development demand and capacity are correct?	Yes
Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?	Better infrastructure immediately around the Hastings urban areas.
Q4: Do you support any particular parts of the draft revised Strategy?	The inclusion of the Wall road area in the reserve greenfields growth areas
Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?	Any land or section owners under a certain size/area in the plains zone but directly opposite city urban areas be able to subdivide and develop their land should city services be accessible.
Any other comments that submitters wishes to make or suggested amendments:	
<p>I live on a plain categorised property less than 1.5 km from the CBD, directly opposite the cities urban housing area and have access to town services i.e, water, sewer, etc. Our property is also included in the Urban air shed zone. A few years back we amalgamated 4 acres from a neighbouring property to our then 5 acres but yet even then our property is still only of lifestyle size and means. Running 20 sheep as lawn mowers does not make a viable business as was never consider to be one by us. It just made good sense that at some point a property in such a location was going to be wanted as part of the urban zone expansion at some point which your review strategy has identified. I just hope that it will proceed at a faster pace than what I witness with other development areas in and around the HDC for the sake of the cities future.</p>	



22/08/2016

HPUDS Review
HB Regional Council
Private Bag 6006
NAPIER 4142

Email: hpuds@hbrc.govt.nz

UNISON SUBMISSION ON THE HERETAUNGA PLAINS URBAN DEVELOPMENT STRATEGY REVIEW 2016

Introduction

Unison Networks Limited (Unison) welcomes the opportunity to provide a submission on the *Heretaunga Plains Urban Development Strategy (HPUDS) Review 2016*. Unison is an electricity distribution business that operates in the Hawke's Bay, Taupo and Rotorua areas. Our network supplies over 110,000 customers we are the fifth largest electricity distributor in New Zealand. Unison's subsidiary, UnisonFibre, provides fibre optic network interconnections and related services throughout the same regions.

Unison is supportive of the approach that the HPUDS Working Group is taking with the review process and the implementation plan for the HPUDS. Our submission focuses on the impact of the identified Greenfield Growth Areas on our network development, infrastructure costs and external factors impacting on infrastructure capacity

Greenfield Growth Areas and Infrastructure Costs

The HPUDS identifies a number of greenfield growth areas as part of the Heretaunga Plains Settlement Pattern. Unison notes that these areas have not varied significantly since the HPUDS in 2010, with the exception of the Arataki extension being removed as a reserve area and changes to the areas identified as inappropriate for greenfield growth. In selecting the growth areas, the HPUDS Working Group used a number of criteria, including an assessment of servicing costs:

Servicing costs have therefore been one of the assessment criteria for the growth areas identified in the strategy. It is also an important issue for the consideration of intensification. Intensification has the potential for considerable upgrade requirements of the existing infrastructure and these are costs that cannot be fully recouped from developers. Councils will be unable to afford to upgrade the infrastructure for intensification to happen everywhere. Intensification will therefore need to be targeted so that the costs to Councils are affordable¹.

¹ HPUDS Working Group (July 2016). *Heretaunga Plains Urban Development Strategy: Draft Revised Strategy for Public Consultation*. Page 19.

Unison agrees with the discussion regarding infrastructure costs set out in the above paragraph. In addition to costs to councils, in the case of electricity, there may be significant cost borne by Unison. For most of the green growth areas identified, these costs will be incurred due to the need to strengthen the network to deliver a greater capacity of service. However, the infrastructure costs of providing a reliable supply of electricity are also dependent on location, not just on intensification. Unison notes that there are some locations identified in the HPUDS that are likely to incur a higher cost relative to the size of the planned growth. This is largely due to the nature of our network in these areas which will require additional reinforcement to deliver an increased capacity of service:

- **Haumoana / Te Awanga:** This is the most challenging and potentially the most expensive growth area for Unison. An additional feeder is likely to be needed in this area to service any significant future increased development.
- **Waimarama:** This location is on a spur and additional strengthening capacity is likely to be needed due to its remoteness.

The areas of **South Havelock North (Middle Road / Iona), Bayview** and the **Taradale Hills** are also likely to incur a higher infrastructure cost relative to the size of the planned growth, but the cost of this will be less significant than the areas identified above. The increased costs in these areas are largely due to increasing the capacity of the electricity network.

External Factors Impacting on Infrastructure Capacity

Unison also notes that there are other external factors that may have an effect on the capacity of our network, and indeed other infrastructure capacity. The following is a short case study illustration of the primary sector changes over the past ten years and how this has impacted on our network.

Unison's experience of demand for new connections or capacity upgrades indicates that the primary sector is cyclical. As prices for particular produce and markets develop over time, those sectors that identify strong market conditions tend to invest. Ten years ago investment was concentrated in intensifying output (irrigation) and preserving yield (frost protection) in the horticulture sector. Around the same time a few sites with either high rainfall or good access to water were converted to dairy production, for example in areas like Patoka and Sherenden. Post the Global Financial Crisis, the primary sectors in Hawke's Bay went through a period of belt tightening, and reduced risk appetite. There was some rationalisation and consolidation, particularly in viticulture and horticulture. Outside of Hawke's Bay, Unison saw continued investment in increasing dairy capacity across our network area between Taupo and Rotorua, as well as better dairy system cleaning and refrigeration in response to more stringent quality requirements – all of which required increased electricity supply. The smaller dairy sector in Hawke's Bay remained largely static.

The focus for the last two years in relation to the Hawke's Bay primary sector's need for power has been in fruit, in particular pip-fruit cool store capacity. There has been significant growth in demand with existing orchards adding or expanding cool store capacity, dry warehousing in commercial areas being converted to insulated cool storage facilities, and some large greenfield developments in the pipeline. To a lesser extent we have seen renewed growth in wine production capacity. This growth in horticulture and viticulture is positive for the region.

Electricity demand from primary production has put pressure on some of our rural feeders, such as in the Heretaunga plains area. We have worked with customers to find innovative

solutions that cost-effectively meet their requirements, without burdening other customers with significant upgrade costs. This has included looking at options for standby generation, which can be a lot cheaper than rebuilding a feeder to be able to back-feed the customer during an outage². We see this type of tailored, solution-focussed, approach as the way forward to cost-effectively meet the diverse needs of our commercial customers, finding the right approach to support the success of their particular business. In some cases commercial customers have operations that “must run” and require a high level of reliability and security, whereas other operations such as cool stores or wineries are able to go without power for longer periods, perhaps with the exception of a few weeks during peak season, where standby generation is a more cost effective back-up.

Unison therefore encourages the Council and developers to engage with us as early as possible to determine the exact cost implications of planned development (both residential, commercial and industrial), well before any resource consent process commences.

Overall, Unison is supportive of the five-year review approach the HPU DS Working Group has implemented. These periodic reviews are a good opportunity to revisit the HPU DS and for Unison and other infrastructure providers to signal any future network constraints and challenges to the Councils. The information provided by the Working Group in the reports is also useful to us in assisting with our network development planning.

For any questions on the points raised, please contact Roanna Vining, Regulatory Affairs Analyst, by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nathan Strong', enclosed in a rectangular box.

Nathan Strong
GENERAL MANAGER, BUSINESS ASSURANCE

² If the HPU DS Working Group is interested, Unison would be happy to approach one of the customers we have worked with on such a solution to see if they would be willing to discuss their experience.

49 Mary Ellen Warren

From: Mary Ellen Warren
Sent: Sunday, August 21, 2016 2:29 PM
To:
Cc:
Subject: Submission

Thank you for the opportunity to provide input.

The scope of the 2016 review was to “consider any updated natural hazard information”

80. There are two key reports due to be finalised in May 2016 which will provide around liquefaction and coastal hazards. Because the reports are not yet currently available for analysis in this literature review.

Until the consultation on the coastal hazards is complete (begun this past week) and the liquefaction report is available (estimated Dec) it is premature to make any decisions with respect to this plan.

Also there does not appear to be land set aside for large scale institutional commercial and tourist use. For example the Hastings Sports Park has impacted on the Urban development of the plains as well as past Bunnings may have. What is the possibility of another world class golf course being established? Is there land available for a university campus? Please clarify how potential future institutional. Commercial and tourist uses will be accommodated. Will they be confined to the urban development areas?

Please acknowledge receipt of these concerns.

Thanks

50 Mark Watkins

Name *	Mark Watkins
Email *	
Phone Number *	
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	
No	
Q4: Do you support any particular parts of the draft revised Strategy?	<p>request the Brookvale Road option be 'included and rezoned for development now.</p> <p>I support the deveopment of the Howard street development, however we need to ensure the quality of the housing in this area.</p> <p>it has been mentioned that some developers are ready to build some very low cost housing in this area, we need to learn from historic mistakes.</p>

51 Carl & Carl Wezel

Name *	Carl & Carl Wezel
Email *	[REDACTED]
Phone Number *	[REDACTED]
Address	[REDACTED] Brookvale Road, Havelock North
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes
Please upload any supporting documents here	Yes, refer below
Q1: Are these the big issues that the Reviewed Strategy needs to tackle?	Yes, it covers the majority of issues
Q2: Do you think our projections of development demand and capacity are correct?	No, the HPUDs does not include the new Regional Economic Development strategy of 5000 more people over 5 years. The current uptake on sections in Hastings & Havelock North has far surpassed the estimates used and now there is nil sections for sale. This was highlighted to working groups back in July 2015 that sections would run out by Feb 2016 – and they have. The economic climate has changed and there are now more people from Auckland and Wellington Regions locating to Hawkes Bay snapping up property – especially sections. Your forward projections are too low.
Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?	HPUD's is not identifying areas for development for the 'baby boomers' and aging population. It identifies 'Greenfield development for residential' but not gated communities for older age population. The planning does not identify areas for schooling, shopping centres, reserves, and other amenities. These should all go hand in hand with residential development. eg. where are the kids going to go to school in Kaiapoi road area? Why is development in Iona road being considered when schooling lacks on that side of town and traffic congestion will be major issues through the village centre etc. Areas marked out for schools, day care etc are key items to include in HPUD's.
Q4: Do you support any particular parts of the draft revised Strategy?	<p>We strongly support the Brookvale road inclusion in to HPUDs and request our District Plan change be resubmitted and considered for this area to be rezoned now – plan submission attached.</p> <p>Brookvale Road needs to be rezoned now to meet land shortage issues.</p> <p>Brookvale Road has:</p> <ul style="list-style-type: none"> – All willing landowner ready to subdivide/develop now – MOU to work with our neighbours to allow development of the land and look at a service corridor along back of our properties – All road front land that can be put in to sections and connected to existing infrastructure immediately.
Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?	

We wish to have our District Plan submission reviewed now that we meet all requirements of HPUDs and the District Plan, and want to be rezoned for residential now. This land can be brought to the market quicker than any other options currently considered.

Under the Opus Greenfield land options matrix Brookvale Road ranked the best option with:

- Flat land close to schools, amenities and public transport
- Low liquefaction and amplification due to Havelock 'pan'
- Lowest development cost
- Best utilisation of existing infrastructure and services (i.e.. can connect to services all along Brookvale)
- Natural buffers to separate from rural area
- Great transport flow and dispersion
- Large portion of the land was previously poultry farms and does not have chemical contamination from orcharding.

Any other comments that submitters wishes to make or suggested amendments:

The Brookvale Road property owners are being penalised and treated unfairly with being unable to develop their land by both council and HPUDS due to a third party not meeting its current consent conditions which require 'zero odour across the boundary'.

The Opus Greenfields report for the HPUDS committee contained inaccurate information about reverse sensitivity and mushroom farm odour and should be ignored by the committee and council due to Te Mata Mushrooms not meeting its current consent conditions which require 'zero odour across the boundary'. They are in breach of there conditions and imposing on our rights as landowners.

Development of this land will remove septic tank systems that will impact on the Te Mata aquifer

Uploaded file(s):

SUBMISSION ON THE PROPOSED HASTINGS DISTRICT PLAN

Clause 6 of the First Schedule, Resource Management Act 1991

Submissions close 5pm 14 February 2014

Full name of submitter:	Carl & Caron Wezel	Agent/ company/ organisation name:	
Full postal address (including postcode):	137 Brookvale Road Havelock North	Full postal address (including postcode):	
Phone:	Mobile: 0274 337 590	Phone:	Mobile:
Email: carl_wezel@clear.net.nz		Email:	

Do you wish to be heard in support of your submission?

Yes

If others make a similar submission, I will consider presenting a joint case with them at a hearing?

Yes

Trade Competition

Submissions cannot be made to gain an advantage through trade competition as per Clause 6 of the First Schedule of the Resource Management Act 1991.

Local Government Official Information and Meetings Act 1987

The information contained in your submission will become publicly available official information held by the Council under the above Act. By taking part in this public submission process, submitters will be deemed to have waived any privacy interests in respect of that information.

Declaration

I acknowledge that by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Signature of submitter	Date
------------------------	------

Postal address:	Hastings District Council, Private Bag 9002, HASTINGS 4156
Delivery address:	Hastings District Council, 207 Lyndon Road East, HASTINGS 4122
Email:	districtplanreview@hdc.govt.nz – please put "Proposed Hastings District Plan Submission" in the subject line.
"If you have emailed us your submission, please do not post us a hard copy of your email"	

For any enquiries about the Proposed Hastings District Plan or making a submission
 please call our Planning Policy team on (06)871 5000
 or email us at districtplanreview@hdc.govt.nz

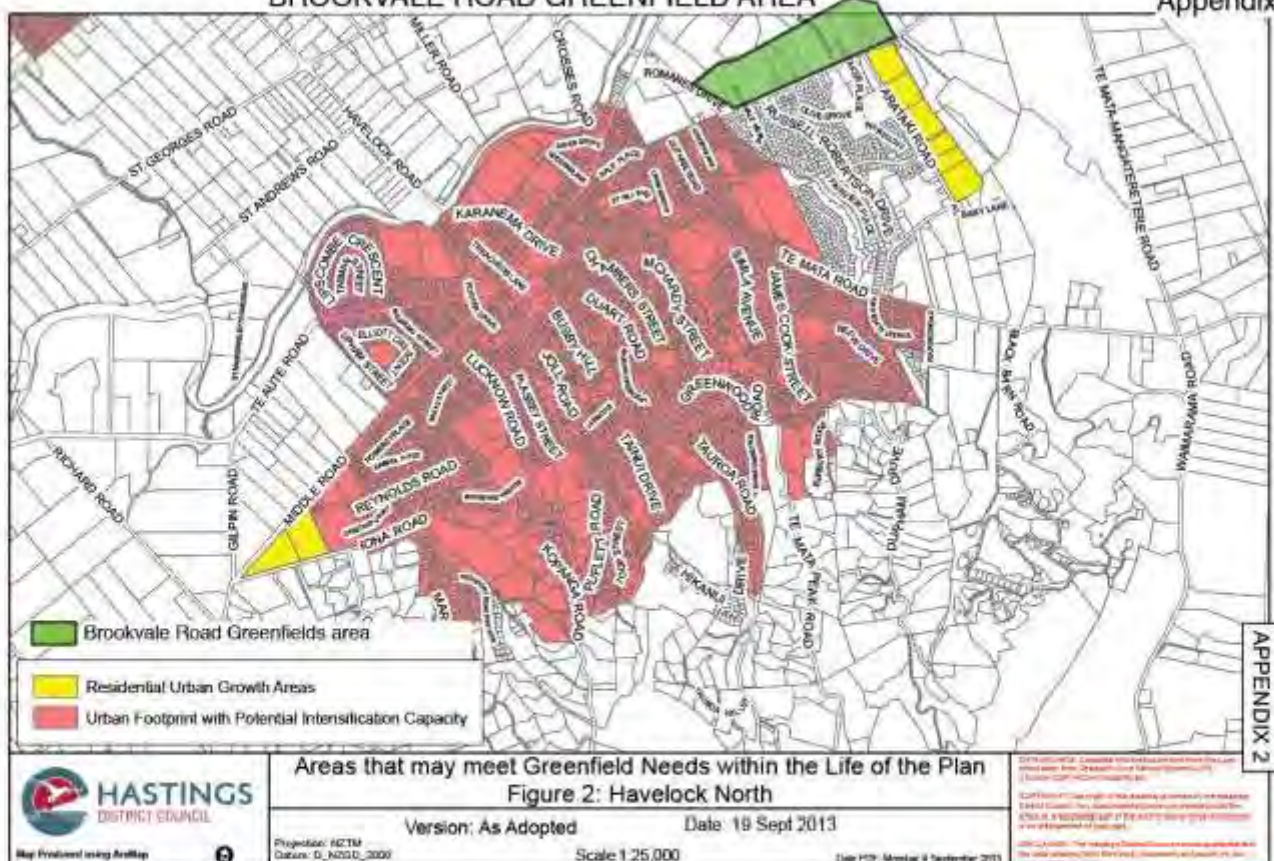
SUBMISSION DETAILS			
SECTION & PARAGRAPH	SUPPORT / OPPOSE / SUPPORT WITH AMENDMENT	SUBMISSION	DECISION SOUGHT FROM COUNCIL
Please refer to the section and paragraph number of the Plan that you are submitting on.	Please clearly indicate whether you support, oppose or support with an amendment the specific part of the plan.	Summarise the nature of your submission and the reasons for your views. You may use extra paper but please ensure your name is on each page and is securely attached to this form.	Clearly state the decision sought from Council with regard to your submission and / or any suggested changes you want Council to make to the section of the plan.
General across 2.4, 8.2, 8.3, and Appendix 2 – Figure 2	Support with amendment to include Brookvale Road area in submission in growth area from 2015	<p>Assessment of Growth Option Sites:</p> <p>We believe the council has overlooked some of the key objectives the evaluation committee earlier set out to achieve by not considering the Brookvale/Davidson Road area in its long term plan. See Appendix 1</p> <p>During the HPUOS process preliminary growth scenarios were identified largely from sites that had been previously identified in strategic studies undertaken by the Council and consultants. The Brookvale/Davidson side of the road was dismissed due to perception "that large portion in productive use and there is no pressing need to compromise this productive use within strategy timeline". We disagree with this short sightedness at the time and bring attention to the previous assessment factors.</p> <p>The scenarios were assessed having regard to a number of factors:</p> <ul style="list-style-type: none"> – The impact on versatile soils for productive purposes. <p>The Brookvale Road soils are identified as having some limitations with a large portion that was in productive use now unproductive (Large number of orchards in the area now pulled out since last review). Smaller acreage, fencing and gateway restrictions to machinery, buffer zones proximity to existing houses, all limit the effective use of this land. Most of the land is now only being used for grazing to keep the grass down, with a number of other orchards contemplating pulling remaining trees. See Appendix 2.</p> <ul style="list-style-type: none"> – The ability to establish a defined urban edge. <p>The Brookvale block has a natural ridgeline terrace that sits above the orchard and vineyards to the east. As such it would form a natural boundary for the eastern urban edge</p>	Rezone the Western side of Brookvale Road between Romanes Drive and ridge past Aratiki Road to Rural Residential or General Residential zone.
		<p>of Havelock North</p> <p>It already borders Brookvale Road on one side the full length to Romanes Drive that is already zoned residential.</p> <p>The other natural boundary is the Crombie Drain – a partial low river terrace that could be reinforced by a wide planted greenbelt and buffer in public ownership that could include a limestone pathway further enhancing Havelock North's walking tracks and bike paths. See Appendix 2.</p> <ul style="list-style-type: none"> – Engineering Infrastructural Issues including flooding. <p>Brookvale Road has storm water system to deviate water away from this side of the road. The land has a natural slope down to the Crombie Drain to prevent surface flooding or storm water restrictions. The Crombie drain has East to West gravity flow, however, this drain is fed from springs and the Eastern end capped off and could easily be modified to cater for flooding or water build up.</p> <p>Existing infrastructure exists along Brookvale road for sewer and water mains. Additional sewer services could be run along buffer zone by Crombie drain to come out on Romanes Drive by existing pumping station.</p> <p>See Appendix 3</p> <ul style="list-style-type: none"> – Land use compatibility. <p>Land use compatibility is restricted due to the narrowness of each parcel of land and side boundary limitations currently in the district plan. A number of land parcels are land locked from machinery access, while others encroach on residential dwellings not providing a suitable buffer zone for agricultural use including spraying. It is widely recognized that soil types on this side of Crombie drain are poor and inferior to others by Thompson Road. The soil dries out too quickly in summer and not ideal for grazing or cropping, and issues in the winter.</p> <ul style="list-style-type: none"> – Impacts on landscape quality. <p>No impact on landscape quality as existing land is behind trees, hedging or houses along Brookvale Road.</p> <p>Land can be further beautified by creating a green belt along the Crombie Drain with plantings, seats, and walking or bike tracks that can be linked from Romanes Drive, along Crombie Drain, along eastern ridge line by Mushroom</p>	

		<p>farm and up to Arataki Honey. This is lower lying ground and not elevated against the skyline of hills impacting on visual eyesore or distraction.</p> <p>— Impact on heritage sites. Nil heritage sites in this area.</p> <p>The ability to meet compact settlement objectives. Ability to cater for all needs whether it be rural residential, intensive population, retirement sector or combination. The land is flat, does not impact on the horizon to the naked eye, does not require special foundations for sloped hill country land, no flooding issues or low lying land, elevated with gradients to allow flow for services without need for costly pumping stations, and importantly utilizes services and amenities in the near vicinity. The land layout would be a great opportunity to offer a mixed lifestyle choice with mixture of Rural Residential sections or General Residential.</p> <p>— The impact on the road network and energy efficiency. Very little or no impact on existing road network already in place along Brookvale Road and Romanes Drive. Davidson Road can be better utilized to route traffic on to Thompson and then on to Napier road for those working in Hastings or Napier areas. No congestion build up on Romanes Drive or having to cross through Havelock North village to get to Hastings or Napier. See Appendix 4</p> <p>Reduced Fuel dependency from utilization of this land provides far better energy efficiency as all schooling is within walking distance for the children to 3 Primary Schools (Te Mata, Hereworth, Proposed Arataki), Intermediate, and High School. See Appendix 5 Parents are not required to cross from one side of town creating congestion in the City Centre to drop kids to and from schools during peak traffic times. See Appendix 7 Crosses Road or Napier Road can be better utilized to move traffic to destinations. See Appendix 4</p>	
		<p>Existing bus services run up Te Mata Road, around the Durham Drive roundabout and then back down Te Mata Road through town. To promote sustainable transport, the existing bus service can be run up Te Mata Road, down Arataki Road, then along Brookvale Road, down Romanes Drive (or on to St Hill Lane) and along Napier Road back to town. The Arataki Road/Te Mata Road corner can be utilized for Summeret Residents to go in to the village. See Appendix 3</p> <p>Buses can be further utilized to transport children from other side of town to run around this ring road and create drop off points for the schools.</p> <p>— The ability to provide for balanced growth across the Plains. One big area that council has overlooked is the utilization of existing parks and the Romanes proposed sports/outdoor park, as well as existing Bike track on Romanes Drive. Majority of homes in this area have children that can walk or bike to these facilities. Rezoning of the Brookvale Road area will allow future families with children to utilize the existing facilities above. Children can walk or bike to these while providing Reduced Fuel dependency from parents not having to transport them all over town.</p> <p>This whole Brookvale Road block with natural boundaries, can cater for growth in the area, utilize all the existing assets and infrastructure, optimize the amenities such as parks and schooling on this side of town, yet protect the productive larger blocks of land outside these boundaries.</p> <p>Mixed zoning could enable growth yet cater for Balanced housing choice:</p> <ul style="list-style-type: none"> — Families wanting flat land for a pony or a few farm animals can be catered for on 2500sqm lots and children can still walk and ride to school or the amenities. — Retirement village or smaller lots to cater for aging population wanting smaller sections to have a base to return to with their camper vans. — Families wanting new home on average 700sqm. 	

		<p>section can be close to schooling and parks as well</p> <p>Summary The final HPUOS report identified some areas under 4.3.2 - Growth Areas The areas identified were considered growth areas for the Herekating Plains beyond 2015. Sites were selected where:</p> <ul style="list-style-type: none"> - Soils are of lesser versatility, or Productive capacity is compromised by - Size and shape of land parcels that mitigates against productive use - Surrounding landuses and reverse sensitivity - Lack of water/poor drainage - Clear natural boundaries exist, or - Logical urban edge greenbelts could be created, or - Greenbelts could provide opportunities for walking and cycling connections, or - Sites support compact urban form, can be serviced at reasonable cost and integrated with existing development. <p>We believe the Brookvale/Davidson Road block meets and exceeds the above requirements yet was not clearly evaluated.</p> <p>We ask the that council includes this area in its beyond 2015 growth area and fully evaluates the potential as we believe a large part of the community would agree with this area being included</p>	

BROOKVALE ROAD GREENFIELD AREA

Appendix







Appendix 6



52 Michael Whittaker

Name *	Michael Whittaker
Email *	
Phone Number *	
Address	Brookvale Road, Havelock North
Please state here if you would like to briefly present your submission verbally at the Working Group's meeting (date to be confirmed in week commencing 12th September).	Yes
Please upload any supporting documents here	Yes, refer below
Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10–30 years?	Please refer to attached document.
Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?	Please refer to attached document.
Any other comments that submitters wishes to make or suggested amendments:	Please refer to attached document.

Uploaded file(s):

22 August 2016

HPUDS Review
Hawke's Bay Regional Council
Private Bag 6006
NAPIER 4142

SUBMISSION ON DRAFT HPUDS REVISED STRATEGY 2016

- 1 In this document the Te Mata Mushroom Company Limited (**TMMC**) provides the feedback on the draft Revised Heretaunga Plains Urban Development (**HPUDS**) Strategy 2016.
- 2 The contact details for TMMC are as follows:

Michael Whittaker
174 Brookvale Road
Havelock North 4157

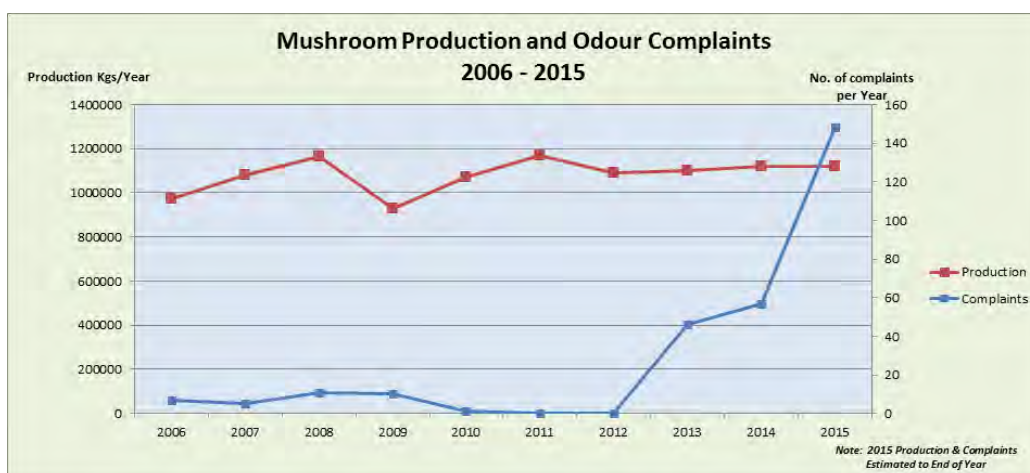
Michael can be contacted on 877 7266 or by email on office@tematamushrooms.co.nz

- 3 TMMC wishes to present its submission verbally at the Working Group's meeting in the week commencing 12 September.

Feedback on draft Revised Strategy document

- 4 The feedback form on the HPUDS website asks the following questions:
 - Q1: Are these the big issues that the Review Strategy needs to tackle?
 - Q2: Do you think our projections of development demand and capacity are correct?
 - Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10-30 years?
 - Q4: Do you support any particular aspects of the draft revised Strategy?
 - Q5: Are there any other amendments that you think should be made to the draft revised strategy? If so, why?
- 5 The feedback that follows addresses questions Q3 and Q5, and in particular the proposal that Brookvale be added as a growth area for the Heretaunga Plains sub-region with an associated reserve area in Romanes Drive. The proposed Brookvale growth area is less than 100 metres from TMMC's mushroom farm in Brookvale Road, Havelock North.

- 6 The mushroom farm has operated at 174-176 Brookvale Road since 1967 and employs 120 staff, many of whom are long-term company employees. It contributes in excess of \$3.5m to the local community in annual wages and salaries.
- 7 The Hastings District Council commissioned report by Economic Solutions Limited (*Te Mata Mushrooms Ltd Business Operation – Regional Economic Impact Assessment*, June 2016) found that TMMC's current annual business operation generated the following total economic impact gains for the Hawke's Bay region:
- 7.1 A Total Revenue impact of approximately \$18.61 million;
 - 7.2 A total Net Household Income impact of \$4.45 million (that is additional total income accruing to the regional household sector);
 - 7.3 A total Employment impact of approximately 200 persons/jobs comprising a direct impact of 120 persons/jobs and a flow-on/multiplied employment impact of 80 persons/jobs;
 - 7.4 A total regional Value Added or Gross Regional Product impact of approximately \$7.19 million.
- 8 When the farm was first established on its present site, it was surrounded entirely by rural horticulture and farm land. The farm land to the east remains today. However the land to the southwest has been developed over the years for residential housing and in the last 3 to 4 years a housing development known as 'Brookvale' has occurred in the Arataki area. Approximately 160 new sections and/or dwellings have been developed or built over that period, some of which are less than 200 metres from the farm's boundary.
- 9 As residential development has crept closer to the farm's boundary there has been a noticeable increase in the number of complaints received about odour from TMMC's operation (see the graph below). This has occurred despite the fact that production levels had been constant over that time and there had been no process changes which would increase the odour footprint of the operation.



- 10 As a result of complaints received, the Hawke's Bay Regional Council made the decision to prosecute TMMC for offences under the Resource Management Act 1991 relating to the discharge of odour from its premises.
- 11 TMMC was sentenced and fined \$15,000 and an enforcement order was made requiring TMMC to lodge with Hawke's Bay Regional Council a draft and then final resource consent application for an extended composting operation in October and December 2016 respectively. The draft resource consent application is currently being prepared by TMMC and will be lodged with the Hawke's Bay Regional Council by October.
- 12 Importantly, when setting that penalty, the sentencing Judge was influenced by the fact that residential development had been allowed to occur as close as 200 metres from the boundary of TMMC's property making it (in his words) 'a classic situation of reverse sensitivity'.

The revised strategy

- 13 HPUDS 2010 had identified the Arataki Extension as an appropriate residential Greenfield Growth Area and this was reflected in the Hawke's Bay Regional Council's Regional Policy Statement (Policy UD4.3).
- 14 In February 2016 Hastings District Council adopted Brookvale as a future urban development replacement for the Arataki Extension. That has been reflected in the 2016 HPUDS review which removes the Arataki Extension from the list of Greenfield Growth Areas 'due to odour issues relating to its proximity to Te Mata Mushroom'.¹ Brookvale, which is northwest of TMMC's site,² is expected to yield 320 dwellings.³
- 15 This has occurred notwithstanding:
- 15.1 Two reports which Hastings District Council had commissioned prior to adopting that resolution (May 2015 reports by Tonkin & Taylor, *Review of the Proposed Arataki Extension and Reverse Sensitivity* and by Jacobs Consultants, *Reverse Sensitivity Assessment for Arataki Re-zoning Proposal – Phase 1 Advice on Odour*);
- 15.2 A subsequent report from Tonkin & Taylor dated March 2016 (*Assessment of Separation Distances – Te Mata Mushrooms*); and
- 15.3 The June 2016 review completed by Opus (*Alternative Greenfield Sites and Review of HPUDS's Settlement Pattern*).
- 16 The key purpose of the March 2016 Tonkin & Taylor Report was to recommend appropriate separation distances between TMMC's farm and sensitive activities or zones providing for residential activity.⁴ The report considered published guidance on separation distances from mushroom farms, and recommended a separation distance of 600 metres

¹ Draft Revised HPUDS Strategy 2016, page 16

² Depicted in Map 25 of the draft Revised Strategy and included as Appendix 1 of this document

³ Page 18

⁴ Page 1 of the report

from the active composting area on TMMC's site and 500 metres from other operational areas.

- 17 In contrast, the May 2016 Jacobs report recommended a separation distance of at least 500 metres from the boundary of TMMC's property.
- 18 There is guidance from Australia⁵ that a separation distance of 1,000 metres may in certain circumstances be appropriate.
- 19 A separation distance of 1,000 metres would effectively exclude future residential development in the Brookvale and most of the Romanes area.
- 20 The June 2016 review completed by Opus (*Alternative Greenfield Sites and Review of HPUDS's Settlement Pattern*) refers to the Tonkin & Taylor and Jacobs Reports and states:⁶

The findings of these assessments confirmed overall that reverse sensitivity was an issue for parts of the Brookvale site. Issues of odour associated with TMM were the reason for the decision to not progress Arataki in favour of Brookvale, it follows that any parts of Brookvale that were similarly affected would also need to be considered as not able to proceed for the same reasons.

Studies done by Jacobs and Tonkin and Taylor consultants in 2015 and 2016 have resulted in the identification of a 500m buffer around the TMM operation. A small area within the Brookvale development area (around the intersection of Brookvale Road and Thompson Road) remains in the buffer area. Consideration should also be given to excluding this area, or possibly utilising it as part of any new development as open space or some other less odour sensitive activity that might assist in confirming the new urban edge to Havelock North.

While substitution of the Arataki Extension with the identified Brookvale urban development area should proceed, it would be prudent to exclude that part of the development area within a 500m buffer against odour from the TMM operation.

Proposed growth area inconsistent with RPS

- 21 Chapter 3.1B of the Regional Resource Management Plan addresses urban development and strategic integration of infrastructure. The intention of that part of the regional policy statement is to manage urban growth and development so that the adverse effects associated with unplanned urban development are avoided. Reverse sensitivity is one such effect.
- 22 One of the objectives of this Chapter is to establish compact and strongly connected urban form throughout the region that avoids, remedies or mitigates reverse sensitivity effects in accordance with the objectives and policies in Chapter 3.5 of the RRMP.⁷ Objective 16 in Chapter 3.5 applies to future activities (such as the urban expansion proposed here) and

⁵ Which was summarized in the Jacobs Report and some of which was reviewed in the March 2016 Tonkin & Taylor Report

⁶ Pages 21 and 22 of that review

⁷ OBJ UD1(b)

requires the avoidance or mitigation of off-site impacts or nuisance effects arising from the location of conflicting land uses.

23 Clause 3.5.4 states:

Of particular concern to industries and rural businesses are complaints about existing activities made by new neighbours. The viability of existing business activities may be threatened as a result of effects which were not perceived as a problem when the activities were first established. Commonly this occurs when rural lifestyle subdivisions are allowed in traditional farming areas. Odours, noise, agrichemical and fertiliser applications, and dust may be considered incompatible with the new adjacent activity. Similar situations arise when residential areas encroach onto industrial areas.

24 Further, clause 3.5.11 states:

To recognise that the future establishment of potentially conflicting land use activities adjacent to, or within the vicinity of each other is appropriate provided no existing land use (which adopts the best practicable option or is otherwise environmentally sound) is restricted or compromised. ...

25 Policy UD12 requires territorial authorities, when preparing or assessing any rezoning, structure plans or other provisions for the urban development of land within the region to have regard to:

Avoidance, remediation or mitigation of reverse sensitivity effects arising from the location of conflicting land use activities.

26 The identification of Brookvale as a future development area does not avoid, and will in fact exacerbate, reverse sensitivity effects by locating a conflicting land use activity (residential land use) so close to a long-established rural activity.

27 As the operator and consent holder TMMC must apply best practice for managing odour from its mushroom farm. However, regardless of whether best practice is applied, there will always be the risk of odour beyond the boundary. As the graph (above) shows, increased residential development close to TMMC's property has resulted in increased numbers of complaints about odour even though the process and production volumes have remained constant.

28 The best way of avoiding reverse sensitivity effects is to apply a buffer or separation distance between mushroom farms and new residential development. If residential development is allowed to occur within these 'buffer' areas and close to TMMC's farm, then the RPS requires that reverse sensitivity effects be remedied or mitigated. Because there are limits to what TMMC can do, the Councils (Hawke's Bay Regional Council and Hastings District Council) as proponents of the Revised Strategy will need to develop solutions to address reverse sensitivity effects if development of the Brookvale area is to occur.

Conclusion

29 The mushroom farm is a longstanding operation on its existing site and a significant employer in Hawke's Bay. The June 2016 report by Economic Solutions Limited confirms

TMMC's economic value to the region. Its importance to the district is reflected in the site's listing as a scheduled activity in the Proposed Hastings District Plan.⁸

- 30 It is accepted that the proposed Brookvale development area is located slightly further from TMMC's farm than the Arataki Extension it replaces. Even so, issues of reverse sensitivity will inevitably arise and potentially imperil the viability of a significant Hawke's Bay business.
- 31 If one applies a separation distance of 500 metres, a significant proportion of the area (to the east of Davidson Road) is potentially affected by odour from the farm. If a more appropriate separation distance based on Australian guidelines is adopted (of say up to 1,000 metres) much of the proposed Brookvale development area would be affected.
- 32 If further residential development is allowed to occur within 500 (or even 1,000) metres of TMMC's operation, it will compound the reverse sensitivity issues that TMMC currently faces as a result of decisions made in the past by Hastings District Council and to a lesser extent, Hawke's Bay Regional Council.
- 33 The Revised Strategy should not be the vehicle by which a further problem is created for TMMC.

Yours faithfully



Michael Whittaker
Managing Director
The Te Mata Mushroom Company Limited

⁸ Appendix 26, No S37

APPENDIX ONE – MAP 25 BROOKVALE

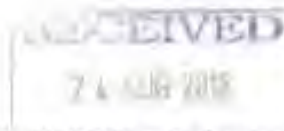
Heretaunga Plains Urban Development Strategy

DRAFT Revised Strategy for public consultation - July 2016

Map 25 – Brookvale (indicative only)



Added in Red:
Indicative boundary
of The Te Mata
Mushroom Farm
showing proximity to
proposed Brookvale
urban development.



Draft HPUDS Revised Strategy 2016 – Submission Information

Here's how to provide feedback on the Review to the joint Council working group.

- ▶ Provide feedback via the website www.hpuds.co.nz/review
- ▶ Email hpuds@hbrc.govt.nz (this form can be used as a base).
- ▶ Write to HPUDS Review, Hawke's Bay Regional Council, Private Bag 6006, Napier 4142

All feedback and submissions are due by 12 noon Monday 22nd August 2016.

The Working Group will be meeting in the week commencing 12 September 2016 to hear verbal submissions. The Working Group will then consider all of the verbal and written submissions, plus advice from the Technical Advisory Group, and decide whether or not to go ahead with the amendments to the HPUDS Settlement Pattern proposed by the Strategy Review.

If you would like to briefly present your submission verbally at the Working Group's meeting in September, then please tick box below.

☒ I would like to present my submission verbally

Submitter Information:

Name: Paul Harris.

Email address: forestgatem@hotmail.co.uk

Contact phone number: 027 243 1079 (06) 8397929

Postal address: P.O. Box 769 NAPIER.

Feedback starters

Some questions regarding the Draft Revised HPUDS Strategy 2016.

A Reviewed HPUDS Settlement Pattern Map is attached.

Q1: What are these the big issues that the Reviewed Strategy needs to tackle?

- Severe Shortage of residential sections in Napier.
- Inappropriate level of development contributions

Q2: Do you think our projections of development demand and capacity are correct?

No - Very clear in the housing mkt today!

Q3: Are there other assumptions and issues that we need to be aware of that will influence urban development over the next 10-30 years?

- Aging - Geographic desirability - changing Infrastructure
affecting location, demand - types of housing -

Q4: Do you support any particular parts of the draft revised Strategy?

- at least its being looked at & let
hope consultation gets heard,

Q5: Are there any other amendments that you think should be made to the draft revised Strategy? If so, why?

- Yes - NCC need to adopt a commonsense
approach that is not self promotion of
there own residential ~~industry~~
interests.

Any other comments that submitters wishes to make:

- We need change if the Napier
community is to develop!

Note: Written submissions, including submitter's name and contact details, will be published and be made publicly available. Information from the Ministry for the Environment in regards to this follows:

Publishing and releasing submissions

All or part of any written submission (including names of submitters), may be published online. Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Local Government Official Information & Meetings Act following requests to one of the Partner councils (including via email). Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this document under the Local Government Official Information & Meetings Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including local councils. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the councils in the course of making a submission will be used by the councils only in relation to the matters covered by this document. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the HPUDS Partner councils may publish.

54 Horticulture NZ

SUBMISSION ON THE HERETAUNGA PLAINS URBAN DEVELOPMENT STRATEGY

TO: HAWKES BAY REGIONAL COUNCIL, HASTINGS DISTRICT COUNCIL AND NAPIER CITY COUNCIL

SUBMITTER: HORTICULTURE NEW ZEALAND

INTRODUCTION AND OVERVIEW

1. Horticulture New Zealand ("Horticulture NZ") welcomes the opportunity to make a submission on the Heretaunga Plains Urban Development Strategy ("HPUDS").

HORTICULTURE NEW ZEALAND

2. Horticulture NZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.
3. On behalf of its 5,600 active grower members Horticulture NZ undertakes detailed involvement in resource management planning processes as part of its National Environmental Policy.
4. The HPUD strategy is not a statutory resource management plan but the implementation of the strategy will have a significant impact on growers in the Hawkes Bay Region and flow through into plan changes in the district.
5. Horticulture NZ has been actively involved in the Proposed Hastings District Plan process and the HPUD Strategy has been a key consideration in the provisions in the district plan, particularly around protection of productive value and where development is appropriate to occur.
6. Horticulture in NZ is a growth industry and is significant in Hawkes Bay. To enable continued production and contribution to the GDP of the region growers need to be able to continue productive activities. This requires that land is retained for economic production.
7. There is increasing pressure in NZ for land suitable for horticulture to be converted to urban land uses. The HPUD Strategy recognises the need to retain versatile land for productive purposes but the identification of additional areas for greenfield development will reduce production potential in the region.
8. A recent survey by Horticulture NZ of grower concerns identified the threat of urban expansion as a key issue.

9. The key constraints to growth in horticultural production remain access to the factors of production - in particular, land and water. Of the 5.5% of land available for production in New Zealand roughly 1/10th was subdivided for lifestyle blocks in the last 15 years. Access to water and land is becoming a key constraint to growth because of competition for versatile land for housing, the availability of water at high reliability, and water quality constraints.
10. Horticulture is a very efficient high value industry. For a comparison, ~50,000 people are employed in the >\$7Bn industry, operating off ~123,000ha. Dairy returns around \$18Bn, employs 30,000 people off a footprint of ~2.5million hectares. Increasingly, iwi based agribusiness is looking to expand into horticulture and Horticulture NZ has supported these groups to do so.
11. Horticulture NZ made a submission on the Resource Legislation Amendment Bill 2015 to ensure that versatile lands are protected in light of the urban development of rural land. That submission described what versatile soils are, the nature of the problem, the reasons why such lands needed to be protected, and concerns with the proposed elevation of development capacity over other uses. Horticulture New Zealand supports the protection of versatile land as part of a broader policy package related to national food chains and recognition of economic opportunities associated with highly productive land.
12. Horticulture NZ also made a submission on the Proposed NPS for urban development which focussed on
 - (a) Lack of spatial planning and specificity regarding the extent of the urban areas;
 - (b) Inefficient allocation of scarce land resulting in land-banking/property speculation;
 - (c) Uncertainties regarding the plan and policy change process;
 - (d) Failure to consider reverse sensitivity issues;
 - (e) Provision, timing and funding of adequate infrastructure;
 - (f) Relationship with other national policy statements ("**NPSs**");
 - (g) Lack of consideration of rural productive uses;
 - (h) Lack of consultation;
 - (i) Estimating sufficient development capacity; and
 - (j) Miscellaneous matters.
13. While not all these matters are relevant to the HPUDS process it identifies Horticulture NZ's concern about urban development in general.

Revised Strategy

14. The revised strategy refers to the HPUDS Review findings and generally confirms that the HPUDS assumptions and directions around urban growth remain sound and confirms that growth is able to be accommodated within the current settlement pattern.
15. The principles that support achievement of the strategy include recognising the opportunities to utilise the versatile soil resource of the Heretaunga Plains for production while minimising the loss of versatile soils for productive purposes and to recognise the significance of the land based economy and encourage its further development.
16. Horticulture NZ in general supports these principles and seeks to see them implemented through the strategy. However the focus should be on versatile land rather than versatile soils.
17. The HPUD Strategy has been incorporated into the Regional Policy Statement in Chapter 3.1B Managing the Built Environment. This chapter refers to versatile land and includes a definition of versatile land:

Versatile Land

In relation to the Heretaunga Plains sub-region, means contiguous, flat to undulating terrain within the Heretaunga Plains sub-region that acts collectively to support regionally (and nationally) significant primary production and associated secondary services on the Heretaunga Plains, based around^{4A}:

- a) an exceptionally high proportion of versatile Class 1-3 soils (comprising almost 90%);*
- b) Class 7 soils that are internationally recognised as having very high value for viticultural production (comprising almost 7%);*
- c) its proximity to a cluster of national and international processing industries and associated qualified labour force; and*
- d) its proximity to the Port of Napier and other strategic transport networks providing efficient transport of produce.*

4A While this definition is based around matters in (a) to (d), the Environment Court's decision in Canterbury Regional Council v Selwyn District Council [W142/96] provides a statement from Judge Treadwell about the wider range of factors he took into account regarding land versatility.

18. This definition and use of versatile land is also incorporated into the Hastings District Plan.
19. The concept of versatile land is broader than versatile soils as it recognises a range of factors that contribute to the land being versatile, not just the soil.

20. Therefore the Strategy should be amended to refer to versatile land and ensure that the matters for assessing the appropriateness of greenfields land are based on versatile land, not versatile soil.
21. The definition of versatile land from the RPS should be included in the Glossary of the HPUD Strategy.

Development targets

22. The HPUD Strategy set a target for development to reach the following allocation levels by 2045:
 - (a) 60% intensification
 - (b) 35% greenfields
 - (c) 5% in rural areas
23. For the 2015 – 2015 period it was anticipated that the development levels would be:
 - (a) 45% intensification
 - (b) 45% greenfields
 - (c) 10% in rural areas
24. The Strategy identifies that these figures were to be achieved over a slow transition for compact development, with how the density targets are reached being left to relevant territorial authorities.
25. However the revised strategy for consultation does not identify what the composition of development over the last 5 years has been. It is important that if the strategy establishes targets that the progress on achieving the targets is reported on.
26. In particular if there has been no progress toward achieving the targets then the approach should be re-assessed to ensure that there are incentives for the targets to be reached. For instance if the targets are not being achieved the Strategy should be more directive in the mechanisms that will be used to achieve the targets. Without clear direction from the Strategy Horticulture NZ is concerned that the concept of compact design will not eventuate.
27. A Report for the review on Residential uptake - distribution of actual growth (<http://www.hpuds.co.nz/assets/Document-Library/Reports/Stage-1-reports/Residential-Uptake-Distribution-of-Actual-Growth.pdf>) notes at 4.8 the following:

Notably infill consents rose even with ample supply of greenfields residential sections and rising land prices, suggesting the new housing market had expanded across income bands with the availability of relatively cheap credit. The 2005 peak is likely due to the Ahuriri apartment developments. The overall pattern of greenfields to infill development is however demonstrated in Figure 10 which shows the development

types as a percentage of the total and as a percentage of the urban consents only. Greenfields has clearly been trending upwards, particularly when the large retirement villages are included in the greenfields total. Of course HUPUDS intends that over the next 30 years there is a transition away from greenfields and rural housing development to infill and intensification, which will require a reversal of the current trend. (Emphasis added)

28. So while the intent of the Strategy is a downward trajectory for greenfields development the recent evidence is that the opposite has occurred.
29. The draft revised strategy includes more land for greenfields development which appears inconsistent with future development only being 35% of all development and settlement and certainly does not provide direction for a change away from greenfields development. In fact inclusion of more greenfields and reserve areas reinforces the acceptance of that form of development.
30. Increasing areas of greenfields development reduces the need to progress with intensification and the change of public attitude that is required.
31. It is recognised that there are public and market acceptance factors that influence the uptake of intensification. However direction needs to be provided through the Strategy to lead the change in acceptance that is required. Without a proactive stance on leading the required acceptance change the Strategy will fail to achieve its targets.

Greenfield areas

32. The Revised Strategy is recommending that the Arataki Extension be deleted as a growth area and be replaced by the Brookvale area as well as reserve areas being added, such as Romanes Drive. Inclusion of such areas has been made having regard to the growth area selection criteria in HPUDS. However both Brookvale and Romanes Dr have production values which will be lost if development occurs in those areas.
33. In addition the Brookvale area is larger than the Arataki Extension so the replacement is not just replacing 'lost lots' but is in effect adding greater scope for greenfields development than under the previous strategy. There were 220 dwellings anticipated in the Arataki Extension but the replacement with Brookvale would provide for 320 and Romanes Dr 100 dwellings.
34. In other words the 'substitution' of Arataki Extension with Brookvale increases the provision for greenfields development.

Retirement requirements

35. The Revised Strategy identifies the increasing need for retirement villages as a requiring greenfield development due to the size of area required. However such facilities also require access to services.
36. Horticulture NZ is concerned that while areas of greenfield development area are identified they may not necessarily be used for provision of retirement facilities. This

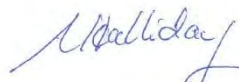
could lead to a future review seeking further greenfields land for retirement facilities. Unless land is specifically tagged for such a purpose then other development could be undertaken and preclude the need identified in the strategy.

37. There also appears to be an assumption that retirement facilities are standalone units. Consideration should be given to incentivising other retirement options, such as apartments, to better utilise available land. Such an approach is consistent with compact development.
38. The Revised Strategy identifies the issue but does not adequately address how the issue may be met within the context of HPUDS.

Conclusion

39. Horticulture NZ seeks the following:
- (a) That production land, particularly high value production land, is not removed from production through the Strategy
 - (b) That the greenfield areas are not extended beyond the number of lots in the original HPUDS.
 - (c) That specific provision be made for retirement facilities
 - (d) That a range of formats for retirement facilities be included in the HPUDS
 - (e) That clear direction is provided for mechanisms to be utilised by councils to ensure that the settlement pattern development targets are met, with a clear downward trend in greenfield development
 - (f) That future reviews clearly report on the development pattern targets
 - (g) The Strategy include a definition for versatile land and replace all uses of 'versatile soil' with 'versatile land'
 - (h) Amend the criteria for assessing areas for greenfield growth development to have a clear linkage to the definition of versatile land.
40. Horticulture NZ would appreciate the opportunity to present to the HPUDS working Group to support this submission.

DATE: 25 August 2016



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on behalf of **Horticulture New Zealand Limited**

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55 Hastings District Council



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Draft HPUDS Revised Strategy 2016 – Submission from Hastings District Council

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Verbal Presentation to Working Group Meeting

Yes we would like the option of presenting our submission to the HPUDS Working Group Meeting.

Feedback

As an HPUDS partner, the Hastings District Council is supportive of and endorses the revised HPUDS Strategy 2016 (except as provided for below) so has no need to comment on the submission form 'Feedback Starter' Questions 1 – 4.

Nature of Amendment sought to Draft Strategy

In regards to Question 5, the Hastings District Council seeks an amendment to the draft revised strategy to retain the 'Arataki Extension' as an area that has been suspended in the short to medium term, but which remains available for the longer term, rather than excluded altogether. This would allow for the development of the Arataki Extension if the odour issue is resolved sometime within the next 30 years and its development is supported by the demand /supply projection from the relevant HPUDS review at the time.

Reasons for Amendment

That the Arataki Extension, apart from the odour non-compliance / reverse sensitivity issue with the Te Mata Mushroom Company, is an excellent greenfield growth area in terms of achieving the HPUDS criteria. It is hoped that the odour issue can be resolved eventually, in which case it would be appropriate for the Arataki Extension area to be available for greenfield residential development. This was the approach taken in responding to submissions to the Proposed Hastings District Plan where submissions to advance the rezoning of the Arataki Extension were rejected on the basis of the odour reverse sensitivity issues with Te Mata Mushrooms, but the area was kept in Appendix 2 of the Proposed Plan '*Areas that may meet Greenfield Needs within the Life of the Plan*', on the basis that the area would be appropriate for residential development if the odour issues were to be resolved.

The characteristics for the selected greenfield growth areas are listed in section 2.2.1 of the Draft Revised Strategy as follows:

- *Soils are of lesser versatility, or*
- *Productive capacity is compromised by:*
 - *Size and shape of land parcels that mitigates against productive use*
 - *Surrounding landuses and reverse sensitivity*
 - *Lack of water/poor drainage*
- *Clear natural boundaries exist, or*
- *Logical urban edge greenbelts could be created, or*
- *Greenbelts could provide opportunities for walking and cycling connections, or*
- *Sites support compact urban form, can be serviced at reasonable cost and integrated with existing development. (Draft Revised Strategy for Consultation July 2016 pp20)*

The Arataki Extension area has already been considered appropriate in meeting these characteristics in regards to its original inclusion in the 2010 HPUDS strategy which states:

“The Arataki extension is located on the eastern side of Arataki Road running from the Arataki Honey property to Brookvale Road. It covers an area of 16 hectares. The site is a terrace that sits above the orchard and vineyards to the east. As such it would form a natural boundary for the eastern urban edge of Havelock North. The infrastructure for future development is immediately adjacent and this includes the intention to build a new school on the former Arataki Camp Ground immediately opposite. Constraints include the value of the soils and the potential conflict with the Mushroom Farm that is sited immediately below the terrace. The market for land in Havelock North particularly for the retirement sector and the ability to form a definitive urban edge lead to a recommendation for this land to be form part of the greenfield growth requirements in the period 2015-2045.” (Heretaunga Plains Urban Development Strategy 2010, page 173)

Although the above extract from HPUDS 2010 demonstrates how the Arataki Extension generally meets the above listed characteristics desired for greenfield growth areas, a brief evaluation against each of these characteristics is provided as follows:

Soils are of lesser versatility: Hawke’s Bay Regional Council Intra Map information identifies this land as ‘Land Use Capability Class 3’. Much of the Heretaunga Plains has a Land Use Capability Class of 1 or 2, with 1 being the most versatile land and 8 being the least versatile. As with that part of Arataki that has already been developed, the versatility of this land is known to be constrained by a ‘clay pan’ below the topsoil.

Productive capacity is compromised:



The Arataki Extension is shown at left within the red dashed outline. This aerial photograph was flown in the period January – March 2015 and illustrates the dry nature of the pasture in comparison to the land to the east. All of the Arataki Extension land is currently in pasture rather than horticultural production. The cadastral boundaries are in black and show that the land is fragmented into six titles ranging in size from 1.55ha – 3.91ha. In addition to this there are 2x 0.36ha, 10m wide buffer reserve strips in District Council ownership along the top of the terrace adjacent the two northern most titles, in anticipation of a residential zoning.

Clear natural boundaries exist: The boundaries of the Arataki Extension are clearly defined by Arataki and Brookvale Roads to the north and west respectively, Albany Lane to the south and the slope of a terrace landform to the east.

Logical urban edge greenbelts could be created: A 10m wide buffer strip reserve has already been purchased by the Hastings District Council for the northern most 360m of the eastern boundary. If the odour issue were to be resolved in the future this buffer reserve could be extended for the full length of the eastern boundary and if necessary the southern boundary at the same or wider width as may be required to mitigate reverse sensitivity effects with Arataki Honey and adjoining vineyards. As well as creating a buffer to the adjoining Plains and Te Mata Special Character Zones, this buffer would also provide the opportunity to form a greenbelt.

Greenbelts could provide opportunities for walking and cycling connections: The buffer reserve that has already been purchased was intended to be multifunctional in providing a walking and cycling path as well as a green belt, linking from Brookvale Road to Arataki Road in the vicinity of Albany Lane.

Sites support compact urban form, can be serviced at reasonable cost and integrated with existing development: The Arataki Extension is a logical extension of the existing urban area of Havelock North given the proximity of recently constructed infrastructure services (water / sewer / stormwater) and community services – playgrounds, reserves and schools.

Given the above, it is considered that provision should be provided within HPUDS for the Arataki Extension to be able to be utilised as a greenfield residential growth area in the future if the odour issues relating to the adjoining Te Mata Mushrooms operation are resolved. The Council would like to make it clear that it would not be appropriate to include the Arataki Extension as a Reserve Area as it has already been demonstrated as a priority area for development ahead of all of the other reserve areas.

Specific Changes Sought to the HPUDS Draft Strategy

Changes to the Draft Strategy are shown as follows. Extracts are shown in *italic font* with requested deletions shown in ~~red strike through font~~ and requested additions shown in red underlined font. The section and page reference to each extract from the Draft Strategy are provided as a header. A brief explanation of the changes sought is provided in regular font under each extract.

HPUDS Draft Strategy – Executive Summary – 2016 Review Findings (page 5)

In responding to immediate greenfields supply availability issues to 2025, the 2016 HPUDS Review confirms the ~~replacement~~ inclusion of Brookvale to substitute for the ~~of~~ Arataki Extension in the short to medium term with Brookvale, and inclusion of additional ‘reserve’ growth areas, as follows:

- South Pirimai
- Romanes Drive (pt) – providing at least part of Brookvale proceeds
- Middle Road (pt)
- Murdoch Road
- Wall Road (pt)

Explanation: This amendment is sought to identify that the Arataki Extension is ‘put on hold’ rather than removed from the strategy entirely.

HPUDS Draft Strategy – Section 2.1.5 Amendments to the Settlement Pattern (page 16)

As a result of the 2016 HPUDS Review the Heretaunga Plains Settlement Pattern was amended and a new concept of ‘reserve areas’ was introduced to ensure that if an identified greenfield growth area could not be progressed following further detailed assessment, it could be easily and quickly replaced by similarly suitable ‘back-ups’.

Specifically, Brookvale Road was introduced as a short to medium term replacement for the Arataki Extension¹ ~~was removed from the list of 2010 HPUDS greenfield growth areas,~~ and a number of ‘reserve’ growth areas were introduced to enable a ready supply response if other greenfield growth areas prove unviable or unable to meet their assumed capacity (e.g. if servicing cost issues affect the viability of Kaiapo Road in Hastings, and the completion of Te Awa in Napier). An independent evaluation was undertaken to assess the comparative suitability of the sites put forward as reserve areas. This was commissioned as part of the 2016 HPUDS Review, and supports the inclusion of the ‘reserve’ growth areas listed in Section 2.1.7.

Explanation: Again, this amendment is sought to identify that the Arataki Extension is ‘put on hold’ in the short to medium term rather than removed from the strategy entirely.

HPUDS Draft Strategy – Section 2.1.6 Replacement Greenfield Growth Areas (Page 17)

In response to issues associated with progressing Arataki Extension, Hastings District Council assessed alternative greenfield growth areas resulting in a recommendation to promote Brookvale as a short to medium term replacement. The independent evaluation as part of the 2016 HPUDS review process, confirmed the replacement of Arataki Extension with Brookvale as appropriate, having regard to the growth area selection criteria in HPUDS (refer Section 3.2.1). As a result, Brookvale has been added to the Heretaunga Plains Settlement Pattern as a Greenfield Growth Area, ~~and~~ The Arataki Extension has been ~~removed~~ retained, but only on the proviso that the odour issue preventing its delivery in the short to medium term is resolved and is supported by the demand and supply projections from the most recent review of HPUDS at that time. This recognises that apart from the odour issue, the Arataki Extension represents an attractive development option both in terms of the market, but also in terms of the HPUDS principles and greenfield selection criteria and is therefore otherwise appropriate for development as

¹ ~~Removed~~ Delayed due to odour issues relating to its proximity to Te Mata Mushrooms.

signalled in HPUDS 2010. It also demonstrates an ability to readily meet the structure planning criteria in the RPS.

~~This reflects that Arataki Extension is unable to be progressed until such time as issues associated with the proximity of Te Mata Mushrooms can be overcome. For Arataki Extension to be progressed as a greenfield growth area in the future, it will need to replace another HPUDS greenfield growth area, unless growth projections exceed current projections.~~

Explanation: These amendments clarify that Brookvale is included in the revised HPUDS strategy as a replacement for the Arataki Extension, but that the Arataki Extension can be retained on the proviso that it can only be utilised for greenfields residential development, when and if, the odour issues are resolved. The amendment also stipulates that any rezoning of the Arataki Extension would need to be appropriate in terms of HPUDS taking into account the demand and supply projections at that time.

HPUDS Draft Strategy – 2.2.2 Greenfield Growth Areas (Page 20)

Areas where future residential greenfield growth has been identified as appropriate sometime during the Strategy's 2015-2045 study period, are as follows:

Napier:

- Bay View (16ha)
- Taradale Hills (35ha)
- Parklands (42ha)
- Park Island (16ha)
- Te Awa (100ha)
- Riverbend / The Loop (60ha)

Reserve Areas:

- South Piriwai (64ha)

Total land area: 333ha

Hastings:

- Lyndhurst (28ha)
- Lyndhurst Road Extension (34ha)
- Northwood (3ha)
- Kaiapo Road (73ha)
- Flaxmere (9ha)
- Irongate / York (27ha)
- Murdoch / Copeland (24ha)
- Howard Street (18ha)
- Brookvale / Arataki (34ha)
- Middle Road / Iona (7ha)
- Havelock North Hills (Lower) (60ha)
- Haumoana (south of East Road) / Te Awanga (15ha)
- Waimarama (11ha)
- Maraekakaho Settlement (17ha)

Reserve Areas:

- Romanes Drive (pt) – provided at least part of Brookvale proceeds (7ha)
- Middle Road (pt) (27ha)
- Murdoch Road (11ha)
- Wall Road (pt) (11ha)

Total land area: 416ha

Explanation: Adding the land areas in provides some context in comparing the different locations in terms of potential yield. It is requested that rather than having separately listed greenfield areas for Brookvale and Arataki, that there be a listing in HPUDS for one 'Brookvale / Arataki' area with the combined yield shown. It is noted that the contribution of the Arataki Extension to the combined 34ha total is 16ha.

Through the recent Proposed Hastings District Plan submission process the southernmost land owner in the Arataki Extension requested that their land not be identified in Appendix 2 of the Proposed Plan '*Areas that may meet Greenfield Needs within the Life of the Plan*'. Appendix 2 of the Proposed Plan as amended by decisions on submission shows this 3.91ha property removed from the Arataki Extension. If rezoning were to be progressed on this basis, the Arataki Extension would only have an area of 12ha being approximately 2.9% of the total greenfields land area (including reserve areas) identified in the HPUDS Draft Strategy for Hastings District. For the purposes of HPUDS, being a long term strategy, it is more appropriate to identify the full 16ha however, in case the owners of the 3.91ha property wish to have their land included in the future.

The HPUDS review has identified a short term greenfields residential land supply issue for Havelock North with little land currently available for residential development, which is an additional reason why the Brookvale area has been included in the Draft Strategy.

In summary then the incorporation of Brookvale / Arataki as one greenfield land supply area in HPUDS allows the short term greenfields land supply issue to be addressed. It also ensures that a logical and appropriate area for greenfields residential development, in the Arataki Extension, can be available for development in the future if the reverse sensitivity issues are resolved and it can be justified in terms of the greenfields residential land supply and demand balance in meeting the principles of HPUDS.

Other Specific Amendments

Any other consequential changes to the Draft Strategy are requested to ensure consistency with the above requested amendments.

Thank you for the opportunity to provide feedback to the HPUDS Draft Strategy 2016.

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